Appendix A

Notice of Preparation, Initial Study, and Scoping Comments

City of Beverly Hills
Notice of Preparation of an Environmental Impact Report (EIR) and Notice of Public Scoping Meeting

DATE: Monday, September 21, 2020 **TIME:** 6:30 p.m. to 8:00 p.m.

LOCATION: **VIRTUAL MEETING ON-LINE LOCATION**: https://www.gotomeet.me/CBHCD/events
Alternatively, phone access is available at 1-866-899-4679
Phone Access Code: 954-861-509

PROJECT: One Beverly Hills Overlay Specific Plan Project

The City of Beverly Hills is preparing a Draft Supplemental EIR for the proposed One Beverly Hills Overlay Specific Plan (herein referred to as "Overlay Specific Plan Project" or "Project"). The public is invited to attend a preliminary "scoping meeting" on **Monday, September 21, 2020 at 6:30 p.m.** to comment on environmental issues that should be addressed in the Draft Supplemental EIR. Due to the on-going public health issues associated with holding in-person gatherings during the Covid-19 pandemic, the scoping meeting will be held virtually. Access to the meeting is available through: (i) the video conferencing link, and (ii) the phone access information identified at the top of this notice.

Project Location: The Project Site is located in the City of Beverly Hills and is bounded on the north by Wilshire Boulevard, on the south by North Santa Monica Boulevard, on the east by the intersection of Wilshire and Santa Monica Boulevards, and on the west by the City's western boundary, which is contiguous with the Los Angeles Country Club. The site is 17.4 acres (758,064 square feet [SF]) in size and includes Assessor Parcel Numbers 4327-028-002 through -016. The Project Site is regionally accessible from Interstate 405 (the San Diego Freeway) and Santa Monica Boulevard, and locally accessible from Wilshire Boulevard. The Project Site is currently developed with the Waldorf Astoria Hotel (9850 Wilshire Boulevard), Beverly Hilton Hotel (9876 Wilshire Boulevard), a 76 service station (9988 Wilshire Boulevard), and includes the vacant former location of the Robinsons-May Department Store (9900 Wilshire Boulevard).



Project Background: The 9900 Wilshire Boulevard portion of the site has an approved entitlement for future development (9900 Wilshire Specific Plan) that allows for the construction of up to 193 condominium units and a 134-room luxury hotel. The Beverly Hilton/Waldorf Astoria site has an

approved entitlement (Beverly Hilton Specific Plan) that allows for additional phases of development, including the future construction of 110 condominium units, a net reduction of 47 hotel rooms in comparison to conditions existing at the time the specific plan was adopted and like-for-like demolition and reconstruction of approximately 51,600 SF of retail, restaurant, meeting and office space.

The proposed Overlay Specific Plan Project is a unified development plan that encompasses the sites with the currently approved entitlements (9900 Wilshire Specific Plan and Beverly Hilton Specific Plan) as well as the parcel addressed 9988 Wilshire Boulevard, the current location of a 76 gas station (Gas Station Site). The proposed Overlay Specific Plan Project consists of two new residential buildings, a new hotel/residential building, alterations to the existing Beverly Hilton hotel, a below grade parking structure, and structures supporting project amenities and features. An elevated platform over Merv Griffin Way from the Beverly Hilton to the southwesterly property line would be the location of an 8-acre botanical garden that would include water features, seating areas, pathways, and other amenities. Approximately 4.5 acres of the botanical gardens are proposed to be publicly accessible.

Project Description: The Overlay Specific Plan Project would allow for alternative site development of the 17.4-acre Project Site than the site development authorized by the development approvals and regulations that are currently applicable to the overall project area (the approved 9900 Wilshire Specific Plan, the approved Beverly Hilton Specific Plan, and the C-3 zoning designation applicable to the Gas Station Site). The proposed Project includes the following:

- New 162 residential unit, 499,806 SF, 32-story, 410' tall residential building (Santa Monica Residences)
- New 141 residential unit, 424,266 SF, 28-story, 369' tall residential building (Garden Residences)
- New 37 residential unit and 42 hotel room, 213,966 SF, 11-story, 124' tall hotel/residential building (Wilshire Building)
- New 127,324 SF amenities and support areas structure, including 30 residential accessory spaces that could be used for staff housing (Promenade)
- Replacement 37,562 SF, 31' tall conference center for Beverly Hilton Hotel
- Replacement 72,697 SF, 20' tall hotel restaurant, retail, 36 hotel room, and support area structure (Beverly Hilton Enhancement)
- 10-acres of open space, including 8-acre botanical garden

Summary Comparison of Approved Entitlements and Proposed Overlay Specific Plan

	Currently Approved Entitlements[1]	Proposed Overlay Specific Plan	Net Change: Proposed Overlay Specific Plan – Currently Approved
Residential Uses (units [sf])	303 [1,068,676]	340 [1,024,553]	+37 [-44,123]
Hotel Uses (rooms [sf])	656 [806,403]	600 [746,323]	-56 [-60,080]
Shared hotel/residential amenities[2] (sf)	0	117,232	+117,232
Accessory Spaces (units [sf])	0 [0]	30 [10,092]	+30 [+10,092]

	Currently Approved Entitlements[1]	Proposed Overlay Specific Plan	Net Change: Proposed Overlay Specific Plan – Currently Approved
Retail Floor Area (sf)	58,357	35,236	-23,121
Total Floor Area Ratio	2.55[3]	2.55	0
Maximum Building Height	9900 Wilshire Boulevard Site: 185'-0"[4] Gas Station Site: 45'-0"[8] Beverly Hilton Site: 200'-0[5]	9900 Wilshire Boulevard Site: 410'-0"[6] Gas Station Site: 124'-0"[6] Beverly Hilton Site: 124'-0"[6]	9900 Wilshire Boulevard Site: +236'-0"[7] Gas Station Site: +79'-0" Beverly Hilton Site: -60'-0"[7]
Parking Spaces	3,323	2,179	-1,144

[1] Approved 9900 Wilshire Specific Plan and Beverly Hilton Specific Plan

[2] Shared amenity space includes the Promenade and a park pavilion building

[3] The FAR used for the gas station site (9988 Wilshire Boulevard) is the 2.0 FAR allowable under C-3 zoning

[4] Measured from +290 datum

[5] Measured from +285 datum

[6] Measured from +301 datum

[7] Height difference measures physical difference (adjusted for datum difference)

[8] Gas Station Site maximum height is the maximum height allowed under C-3 zoning

Construction is anticipated to commence in late 2021 and take approximately 50 months to complete.

Initial Study: Based on the conclusions of the Initial Study prepared for the Overlay Specific Plan Project, the following areas of potentially significant environmental impact are anticipated to require analysis in the Draft Supplemental EIR:

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

Potential cumulative impacts and potential for growth inducement will also be addressed; alternatives, including the No Project Alternative, will be evaluated.

Purpose of the Scoping Meeting: The purpose of the scoping meeting is to present the Overlay Specific Plan Project in a public setting and provide an opportunity for a full airing of the environmental issues that are important to the community. The meeting will include a presentation of the proposal and the environmental issues to be analyzed in the Draft Supplemental EIR will be described. Following the presentation, interested agencies, organizations, and members of the public will be encouraged to present views concerning what environmental issues should be included in the Draft Supplemental EIR. The oral and written comments regarding potential environmental effects of the Overlay Specific Plan Project made during the scoping meeting will be addressed by the Draft Supplemental EIR.

30-Day Comment Period: The City invites all interested members of the public to attend the public scoping meeting. The City also invites written comments on issues related to potential environmental impacts during a 30-day comment period, which starts on ***Friday, September 4, 2020*** and will conclude on ***Monday, October 5, 2020***. Written comments should be addressed to:

Masa Alkire, AICP, Principal Planner
City of Beverly Hills Community Development Department
455 North Rexford Drive
Beverly Hills, California 90210
Fax: (310) 858-5966
Email: malkire@beverlyhills.org

After the Draft Supplemental EIR has been prepared, it will be released for public review and comment. The Planning Commission will then hold a public hearing on the Draft Supplemental EIR and on the Overlay Specific Plan Project. Separate notices of the availability of the Draft Supplemental EIR and of the hearings on the Project will be released at later dates.

The case file on this Project, which includes the plans and applications, is on file at the Planning Division, 455 North Rexford Drive, Beverly Hills, California 90210. Copies of the Initial Study are also available in the Planning Division at City Hall and online at www.beverlyhills.org/environmental. If there are any questions regarding this notice, or if you would like to review the case file (plans and applications) or receive copies of available documents, please contact **Masa Alkire, AICP, Principal Planner at (310) 285-1135 or via email at malkire@beverlyhills.org**.

Signature	September 2, 2020 Date
Masa Alkire, AICP Printed Name	Principal Planner Title

The meeting is accessible at https://www.gotomeet.me/CBHCD/events and oral comment may be provided during the meeting. Members of the public may attend this meeting telephonically at 1-866-899-4679 (access code 954-861-509) to listen to and to provide oral public comment. Written public comment can be offered electronically prior to and during the meeting by emailing malkire@beverlyhills.org. If you are an individual with a disability and need a reasonable modification or accommodation pursuant to the Americans with Disabilities Act (ADA), please contact (310) 285-1126 prior to the meeting for assistance.



One Beverly Hills Overlay Specific Plan

Initial Study

prepared by

City of Beverly Hills
Planning Division, Department of Community Development
455 North Rexford Drive
Beverly Hills, California 90210
Contact: Masa Alkire, AICP, Principal Planner

prepared with the assistance of

Rincon Consultants, Inc.
250 East 1st Street, Suite 1400
Los Angeles, California 90012

December 2020

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
rinconconsultants.com

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Appendix

Appendix A – One Beverly Hills Shadow Studies

Initial Study

1. Project Title

One Beverly Hills Overlay Specific Plan

2. Lead Agency Name and Address

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

3. Contact Person

Masa Alkire, AICP, Principal Planner
malkire@beverlyhills.org
310-285-1135

4. Project Location

9850, 9876, 9900, and 9988 Wilshire Boulevard
Beverly Hills, California 90210

Assessor's Parcel Numbers (APNs): 4327-028-002 through -016

The 17.4-acre project site is located west of the intersection of Wilshire Boulevard and Santa Monica Boulevard at the western edge of the City of Beverly Hills. The project site is approximately seven miles west of the City of Los Angeles Civic Center and six miles northeast of the City of Santa Monica. Traveling along Santa Monica Boulevard, the project site is approximately 2.25 miles northeast of Interstate 405 (I-405). Figure 1 shows the project location on a regional scale.

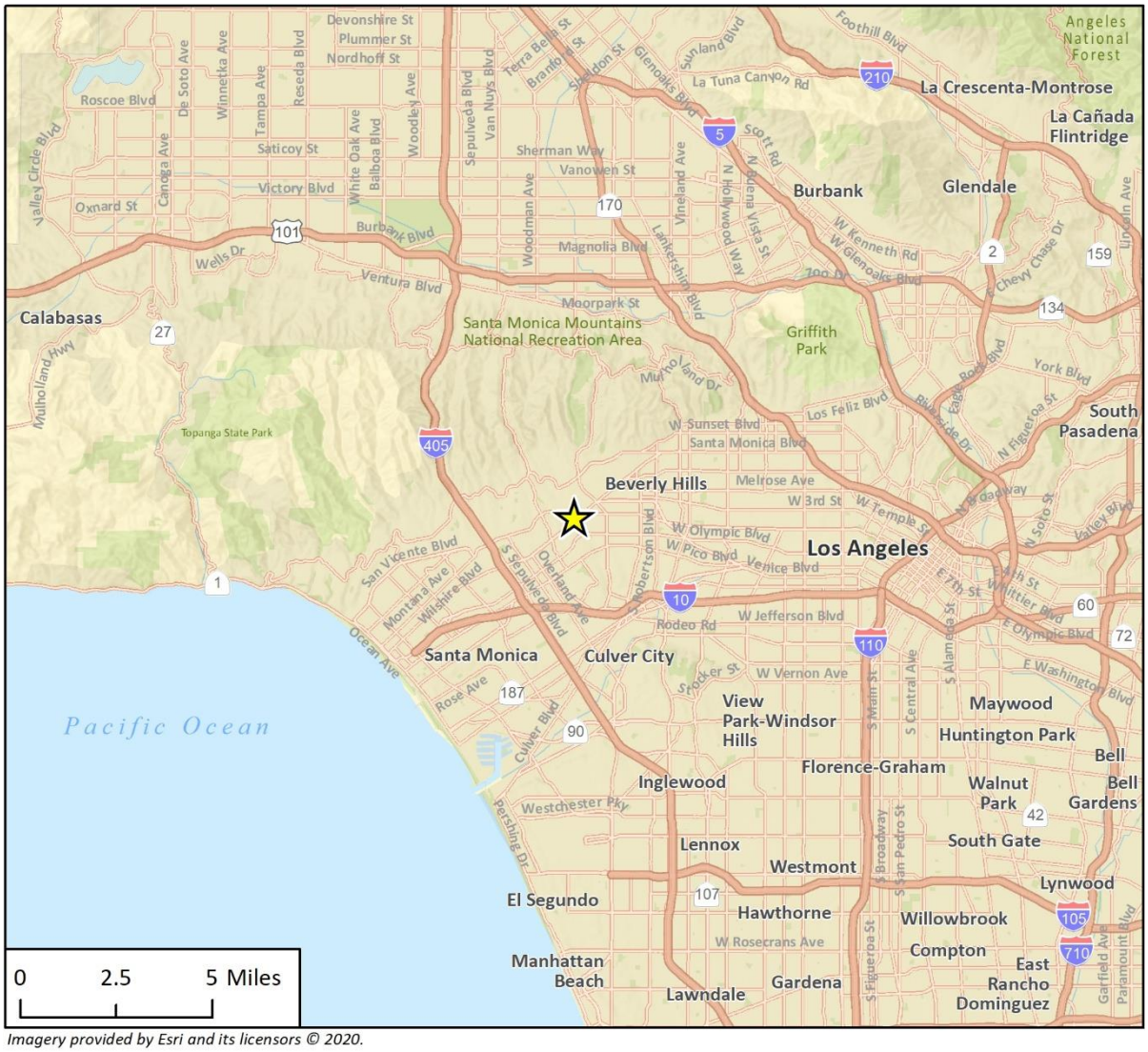
Approximately 54 percent of the project site is developed with existing structures and impervious surfaces, while 46 percent of the project site is graded and undeveloped. The project site currently contains existing hotels with related facilities (Beverly Hilton and Waldorf Astoria Beverly Hills) at 9850-9876 Wilshire Boulevard, a gas station with convenience store at 9988 Wilshire Boulevard, and a vacant, partially excavated property at 9900 Wilshire Boulevard. Merv Griffin Way, a four-lane, north-south, private access road that is, and historically has been, open to public use, traverses the project site. Figure 2 shows the project site on a local scale.

5. Project Sponsor's Name and Address

BH Luxury Residences, LLC
1800 Century Park East, Suite 500
Los Angeles, California 90067

Oasis West Realty, LLC
1800 Century Park East, Suite 500
Los Angeles, California 90067

Figure 1 Regional Location



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Project Location

N

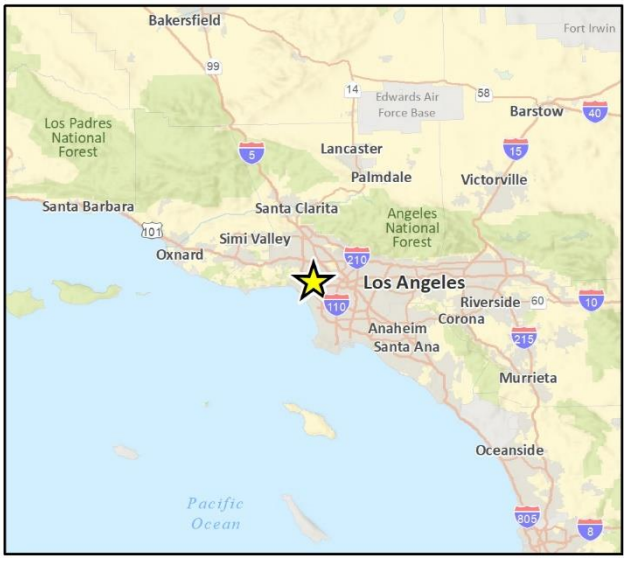


Figure 2 Project Location



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6. General Plan Designation

Current Designation

9850-9876 Wilshire Boulevard: Beverly Hilton Specific Plan
9900 Wilshire Boulevard: 9900 Wilshire Specific Plan
9988 Wilshire Boulevard: General Commercial, Low Density

Proposed Designation

A new general plan overlay designation, the "One Beverly Hills Specific Plan Overlay", is proposed to be applied to the project site while retaining the existing underlying designations.

7. Zoning

Current Zoning

9850-9876 Wilshire Boulevard: Beverly Hilton Specific Plan
9900 Wilshire Boulevard: 9900 Wilshire Specific Plan
9988 Wilshire Boulevard: C-3 Commercial

Proposed Zoning

A new overlay zoning, the "One Beverly Hills Specific Plan Overlay" zoning designation, is proposed to be applied to the project site while retaining the existing underlying zoning designations.

8. Description of Project

The One Beverly Hills Overlay Specific Plan (herein referred to as "proposed project" or "project") proposes to establish a new Overlay Specific Plan that would allow for the comprehensive and coordinated redevelopment of the project site. The Overlay Specific Plan would be a standalone planning document and would not affect or replace the two existing, previously approved Specific Plans that regulate a portion of the project site, or the current C-3 zoning on the gas station site. The Beverly Hilton Specific Plan was approved in 2008 and covers 9850-9876 Wilshire Boulevard, and the 9900 Wilshire Specific Plan was approved in 2008 and amended in 2016 and covers 9900 Wilshire Boulevard (collectively referred to as the "Existing Specific Plans"). Additionally, the project site includes the existing, currently closed gas station at 9988 Wilshire Boulevard, which is zoned C-3 commercial and is not included in the Existing Specific Plans. The currently proposed Overlay Specific Plan would overlay the three existing sites and, if enacted, regulate development of the project site upon collective approval of all property owners and lenders.

The proposed Overlay Specific Plan would regulate the future development of the project site. The applicant has proposed that the Floor Area Ratio (FAR)[1] and land uses within the Overlay Specific Plan area approximate the overall approved FAR and land uses authorized by the Existing Specific Plans, with the addition of allowable floor area assumed for the 9988 Wilshire site (identified in the project application as a 'calculated entitlement' of approximately 58,350 square feet [sf]). The

[1] Floor area ratio (FAR) is the measurement of a building's floor area in relation to the size of the parcel on which the building is located. FAR is expressed as a decimal number and is derived by dividing the total area of the building by the total area of the parcel (building area ÷ parcel area).

proposed Overlay Specific Plan would redistribute the previously approved Existing Specific Plans floor areas and the 'calculated entitlement' floor area throughout the project site in a unified development plan and allow for increased building heights to provide approximately 10 acres of open space on the project site, including a publicly accessible botanical garden and a sculpture garden along Wilshire Boulevard.

Project Background – Existing Specific Plans

9900 Wilshire Specific Plan

The 9900 Wilshire Specific Plan applies to the portion of the project site located at 9900 Wilshire Boulevard, which is currently vacant and graded (see Figure 2). The City approved the 9900 Wilshire Specific Plan and certified its accompanying Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) in 2008. In 2016, the City amended the 9900 Wilshire Specific Plan and certified a Supplemental EIR (SEIR) ("9900 Wilshire Specific Plan 2016 SEIR"). The 9900 Wilshire Specific Plan allows for the development of up to 193 condominium units and a 134-room luxury hotel in two buildings, along with an ancillary building for publicly accessible amenities including approximately 16,057 sf of hotel restaurant, 7,940 sf of meeting space, 14,435 sf of spa and fitness, and other guest amenities (City of Beverly Hills 2016).

Beverly Hilton Specific Plan

The City also adopted the Beverly Hilton Specific Plan and certified its accompanying EIR in 2008 ("Beverly Hilton Specific Plan 2008 EIR"), which apply to the portion of the project site located at 9850-9876 Wilshire Boulevard (Beverly Hilton Site) (see Figure 2). The Beverly Hilton Site currently contains the Beverly Hilton and the Waldorf Astoria Beverly Hills. The Beverly Hilton is a 569-room luxury hotel with approximately 14,600 sf of retail and restaurant space and 64,900 sf of banquet and meeting space. The Waldorf Astoria is a 170-room luxury hotel located on the east corner of the triangular Beverly Hilton Site, adjacent to the intersection of Santa Monica Boulevard North and Wilshire Boulevard. The Beverly Hilton site is being developed in phases under the Beverly Hilton Specific Plan. The Waldorf Astoria, which opened in 2017, was developed as the first phase of the Beverly Hilton Specific Plan. The Beverly Hilton Specific Plan also allows the development of 110 condominium units and includes a net reduction of 47 hotel rooms in comparison to conditions existing at the time the specific plan was adopted and the like-for-like demolition and reconstruction of approximately 51,600 sf of retail, restaurant, meeting, and office space.

Description of the Proposed Project

Implementation of the proposed Overlay Specific Plan would result in the development of two residential buildings, a hotel/residential building, some alterations to existing Beverly Hilton structures, a parking structure, and structures for supporting amenities and features. Approximately 10 acres of the project site would be open space. An elevated platform over Merv Griffin Way from the Beverly Hilton to the southwesterly property line would consist of an 8-acre botanical garden that would include native and cultured[2] California plant species, sculptures, water features, shaded seating areas, two miles of walking/running pathways, a restaurant, and other amenities. One mile of pathways within approximately 4.5 acres of the botanical gardens would be accessible to the public, and one mile of pathways within approximately 3.5 acres of the botanical gardens would be

[2] Cultured California plant species refers to drought-tolerant, non-invasive plants.

reserved for residents, the Amenities Access Program (AAP)[3], and hotel guests. A conservancy would be established to manage, maintain, and coordinate educational programming for the gardens and board members would include residents of the proposed project, school and community representatives, and representatives of the hotels. The public portions of the botanical garden would be open from sunrise to sunset and security services would be provided through the conservancy or the homeowners association.

Primary access to the project site would be provided by a reconstructed Merv Griffin Way, which will include access points for the Beverly Hilton lobby entrance and the new below-ground parking structure. Merv Griffin Way would continue to function as a publicly accessible private road between Wilshire Boulevard and Santa Monica Boulevard. A new private road along the southwestern property line would provide access to the residential buildings, the new luxury hotel and residences building, and the below-ground parking structure. Figure 3 shows an illustrative version of the proposed site plan. Additional details of the proposed project are presented below.

Table 1 summarizes the characteristics of the proposed project. Table 2 presents the approved entitlements under the Existing Specific Plans and provides a comparison of the approved entitlements to those of the proposed Overlay Specific Plan. Table 3 summarizes the existing conditions of the project site and compares the existing conditions to those of the proposed entitlements.

[3] The AAP would allow 250 non-residents/non-hotel guests to access the residential and hotel amenity spaces subject to guidelines, bylaws, and rules established for the AAP.

Table 1 Characteristics of the Proposed Project

	Proposed Project Characteristics	
	On the Beverly Hilton Site	**On the 9900 Wilshire Boulevard Site and Gas Station Site**
Lot Area (sf)	389,597	368,467
Total Building Floor Area (sf)	Beverly Hilton Hotel (E): 350,789 Waldorf Astoria Hotel (E): 207,026 Conference Center (N): 37,562 Beverly Hilton Enhancement (N): 72,697	Santa Monica Residences (N): 499,806 Garden Residences (N): 424,266 Wilshire Building (N): 213,966 Promenade and Park Pavilion (N): 127,324[2]
Building Heights	Beverly Hilton Hotel (E): 79'-1" Waldorf Astoria Hotel (E): 124'-0" Conference Center (N): 31'-0" Beverly Hilton Enhancement (N): 19'-6"	Santa Monica Residences (N): 410'-0" Garden Residences (N): 369'-0" Wilshire Building (N): 124'-0" Park Pavilion (N): 20'- 1" Promenade[3] (N): 5'-0"
Residential Use (units [sf])	0 [0]	340 [1,024,553]
Hotel Uses (rooms [sf])	558 [632,838]	42 [113,485]
Shared hotel/residential amenities[3] (sf)	0	117,232
Accessory Spaces (units [sf])	0 [0]	30 [10,092]
Retail (sf)	35,236	0
Parking Spaces	2,179[4,5]	
Private Open Space (sf)[1]	174,240[4]	
Public Open Space (sf)	261,360[4]	
Total Open Space area (sf)	435,600[4]	

sf= square feet; (E)= existing; (N)= new

[1] Private open space would be reserved for hotel guests and residents.

[2] Accessory spaces located within the Promenade are accounted for in the square-footage reported below for "Accessory Spaces"

[3] The Promenade is a shared hotel/residential amenity space that interconnects between the buildings and contains the Park Pavilion Building

[4] Spans the three parcels of the project site

[5] The project proposes 1,865 new parking spaces. In addition, there are a total of 314 existing parking spaces that would remain at the Waldorf Astoria Hotel.

Table 2 Comparison of Approved and Proposed Entitlements on the Project Site

	Currently Approved Entitlements[1]	Proposed Entitlements	Net Change (Proposed Entitlements – Currently Approved)
Residential Uses (units [sf])	303 [1,068,676]	340 [1,024,553]	+37 [-44,123]
Hotel Uses (units [sf])	656 [806,403]	600 [746,323]	-56 [-60,080]
Shared hotel/residential amenities[2] (sf)	0	117,232	+117,232
Accessory Spaces (units [sf])	0 (0)	30 [10,092]	+30 [+10,092]
Retail Floor Area (sf)	58,357	35,236	-23,121
Total Floor Area Ratio	2.55[3]	2.55	0
Maximum Building Height	9900 Wilshire Boulevard Site: 185'-0"[4] Gas Station Site: 45'-0"[8] Beverly Hilton Site: 200'-0"[5]	9900 Wilshire Boulevard Site: 410'-0"[6] Gas Station Site: 124'-0"[6] Beverly Hilton Site: 124'-0"[6]	9900 Wilshire Boulevard Site: +236'-0"[7] Gas Station Site: +79'-0" Beverly Hilton Site: -60'-0"[7]
Parking Spaces	3,323	2,179	-1,144

[1] Sources: City of Beverly Hills 2008a and 2016

[2] Shared amenity space includes the Promenade and a park pavilion building

[3] The FAR used for the gas station site (9988 Wilshire Boulevard) is the 2.0 FAR allowable under C-3 zoning

[4] Measured from +290 datum

[5] Measured from +285 datum

[6] Measured from +301 datum

[7] Height difference measures physical difference (adjusted for datum difference)

[8] Gas Station Site maximum height is the maximum height allowed under C-3 zoning

Table 3 Comparison of Existing Conditions and Proposed Entitlements on the Project Site

	Existing Conditions	Proposed Entitlements	Net Change (Proposed Entitlements – Currently Existing)
Residential Uses (units [sf])	0	340 [1,024,553]	+1,024,553
Hotel Uses (units [sf])	724,649	600 [746,323]	+21,674
Shared hotel/residential amenities[1] (sf)	0	117,232	+117,232
Accessory Spaces (units [sf])	0 [0]	30 [10,092]	+30 [+10,092]
Retail Floor Area (sf)	0	35,236	+35,236
Gas Station Floor Area (sf)	3,521	0	-3,521
Total Floor Area Ratio	0.96	2.55	+1.59
Maximum Building Height	9900 Wilshire Boulevard Site: 0'-0" Gas Station Site: 21'-10" Beverly Hilton Site: 124'-0"	9900 Wilshire Boulevard Site: 410'-0"[2] Beverly Hilton Site: 124'-0"[2]	9900+ 9988 Wilshire Boulevard Site: +410'-0" Beverly Hilton Site: +0'-0"
Parking Spaces	1,239	2,179	+940

[1] Shared amenity space includes the Promenade and Park Pavilion Building.

[2] Measured from +301 datum

9900 Wilshire Boulevard Site and Gas Station Site (9988 Wilshire Boulevard)

The 9900 Wilshire Boulevard Site is a vacant, partially excavated property that is subject to the 9900 Wilshire Specific Plan (see above). The gas station site at 9988 Wilshire Boulevard currently contains a gas station with a convenience store and is subject to C-3 zoning and a low density commercial General Plan Designation; the gas station does not lie within the Existing Specific Plans. The gas station is currently closed and would be demolished as part of the construction phase of the proposed project. See Figure 2 for the locations of these sites on the project site and see Figure 4 for the proposed demolition plan associated with the proposed project.

A majority of the proposed project would occur on the 9900 and 9988 Wilshire Boulevard portion of the project site. On this portion of the project site, the proposed project would develop three new buildings, including two residential buildings and one mixed-use hotel and residential building. One proposed residential building (Garden Residences) would contain 141 residential units and the other proposed residential building (Santa Monica Residences) would contain 162 residential units. Garden Residences and Santa Monica Residences would be approximately 369 feet and 410 feet in height, respectively, and be located near the southwesterly project site boundary as shown in Figure 3. The taller of the two residential structures, Santa Monica Residences, would be located nearest to Century City in the project site's southwestern-most corner. Both residential buildings would have an oval footprint and be generally oriented in northeast-southwest direction so that the narrow elevation of the buildings face the existing single-family residential area north of the project

site. The proposed Wilshire Building would include a luxury 42-room hotel and 37 residential units and be located along Wilshire Boulevard near the project site's northwesterly corner. The Wilshire Building would be approximately 124 feet in height.

In addition to the proposed new buildings, a multi-level Promenade (including a below ground portion) would be constructed to provide connections between the Garden Residences, Santa Monica Residences, and Wilshire Building. The Promenade would also include various amenities for the project residents, 30 accessory spaces that could be used for various purposes (e.g., staff living quarters, rooms for offices, wine storage, or other ancillary storage), a spa, and support spaces. A three-level, below-grade parking structure would be added to the project site to provide parking for future residents, hotel guests and visitors, employees, and botanical garden visitors. The parking structure would be accessible from Santa Monica Boulevard and would accommodate approximately 1,865 parking spaces (Walker Consultants 2020). The parking structure would include designated areas for ride-sharing, electric vehicle charging, amenity areas, and support space including a centralized loading dock. Portions of the botanical gardens and walking paths would also be developed on the 9900 and 9988 Wilshire Boulevard Site.

Beverly Hilton Site (9850-9876 Wilshire Boulevard)

The Beverly Hilton Site is currently developed with two hotels (Beverly Hilton and Waldorf Astoria Beverly Hills), as described above.

The proposed project would include the following alterations to the existing Beverly Hilton structures:

- The existing Beverly Hilton conference center would be demolished and replaced with a proposed approximately 37,562-sf Beverly Hilton Conference Center that would include restaurants, retail, meeting space, and related support space.
- The existing 181-room Beverly Hilton's Oasis Building would be demolished.
- The existing Beverly Hilton parking structure adjacent to Santa Monica Boulevard would be demolished and replaced with approximately 35,236 sf of proposed commercial use, including a boutique food market, retail and dining uses (Beverly Hilton Enhancement), and 36 poolside hotel rooms adjacent to the Beverly Hilton pool and related support space.

The Beverly Hilton's Wilshire Tower would not be demolished or altered as part of the proposed project. Likewise, the existing Waldorf Astoria Beverly Hills, which provides 314 parking spots, would not be demolished or altered as part of the proposed project. Portions of the botanical garden and walking paths would also be added to the Beverly Hilton Site. Figure 4 illustrates the proposed demolition plan for the entire project site.

Sustainable Features

The proposed project would be designed to achieve a Leadership in Energy and Environmental Design[4] (LEED) Gold rating and WELL[5] Certification through environmentally-sensitive architecture and building systems. Specific sustainability features would include:

4 LEED is a widely used building sustainability rating system in which Gold is the second highest rating a building can received for the green building features incorporated into the design (United States Green Business Council 2020).
5 WELL is a building certification focused on enhancing the health and wellbeing of building occupants through building design features and operational policies (WELL 2020).

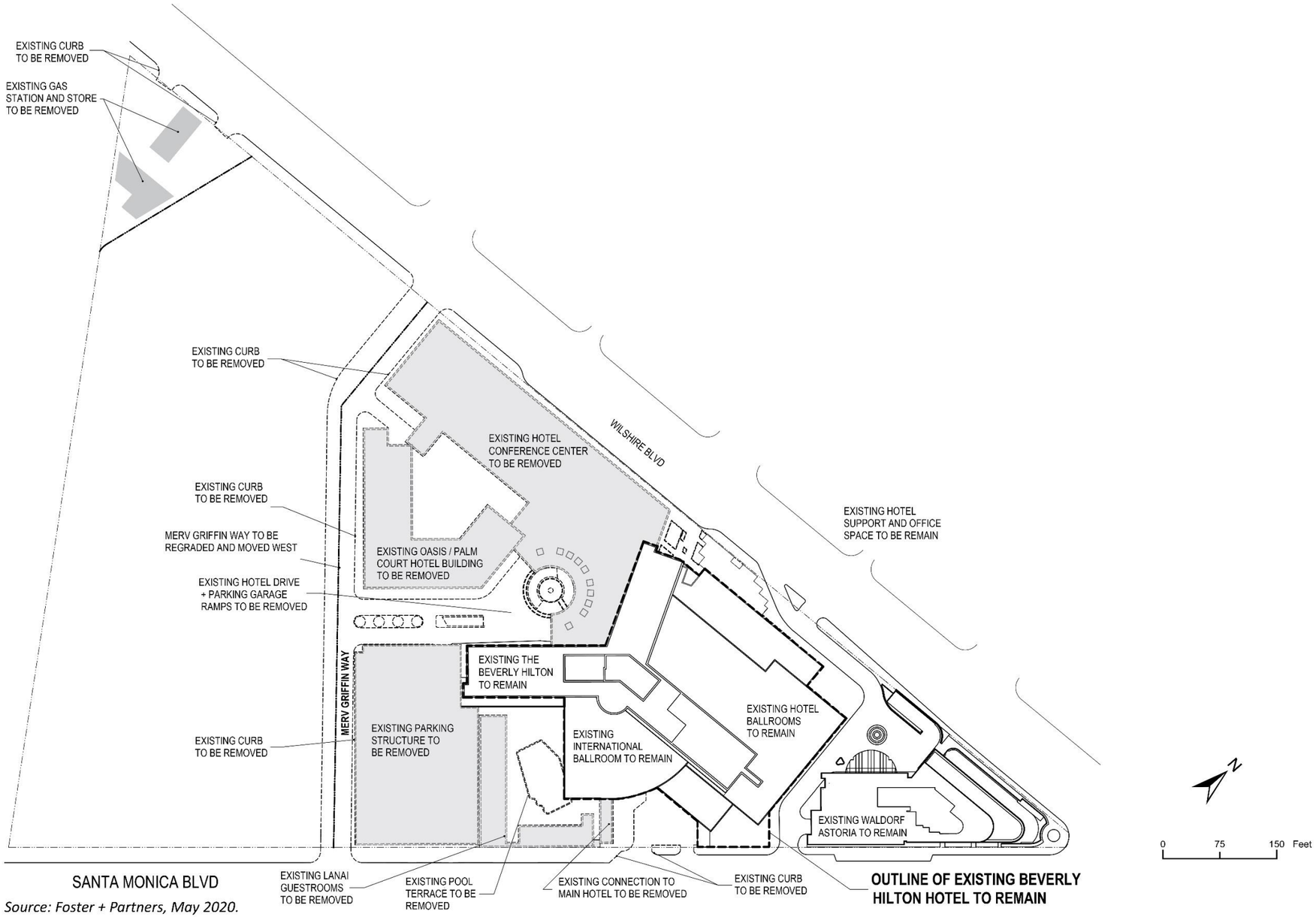
- Centralized mechanical, electrical, and plumbing (MEP) system, resulting in greater efficiency and minimal duplicity
- Low embodied carbon materials
- Rainwater management including collection, storage, filtration, distribution, and reuse to irrigate botanical gardens and landscaping
- Greywater collection, storage, treatment, and reuse to irrigate botanical gardens and landscaping
- Climate control irrigation
- Native and cultivated California landscape
- Minimize evaporation loss from water features and soil via landscape and structure shading
- Shading, natural ventilation, and thermal massing in façade design
- Energy-efficient heating, ventilation, and air conditioning (HVAC) systems
- Lighting and energy recovery
- Smart metering
- Green roofs on new buildings
- Electric vehicle (EV) parking
- Bicycle parking and storage
- Low toxicity materials

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Figure 3 Illustrative Site Plan



Figure 4 Proposed Demolition Plan



Source: Foster + Partners, May 2020.

Project Construction Schedule

Construction of the proposed project is anticipated to commence in late 2021 and take approximately 50 months to complete. Occupancy/operation of the proposed project is expected to occur between 2026 and 2030.

9. Surrounding Land Uses and Setting

The project site is located near the western City limit and is bounded on the north by Wilshire Boulevard, on the south by Santa Monica Boulevard, on the east by the intersection of Wilshire and Santa Monica Boulevards, and on the west by the Los Angeles Country Club's golf course. Surrounding land uses include the following:

- **North.** Located to the north of the project site, immediately across Wilshire Boulevard, is Beverly Gardens Park, a single-family residential neighborhood, and El Rodeo School, a Beverly Hills Unified School District school for kindergarten through eighth grade.
- **East.** The intersection of Wilshire and Santa Monica Boulevards borders the project site to the east. The City's "Business Triangle" with low-rise retail buildings and mid-rise office buildings and medical facilities, bounded by Wilshire Boulevard, Santa Monica Boulevard, and North Crescent Drive, lies east of this intersection. The Business Triangle contains retail, restaurants, offices, a post office, and medical facilities.
- **South.** Located to the south of the project site, immediately across Santa Monica Boulevard, are commercial uses and South Santa Monica Boulevard (State Route 2 [SR 2]). The commercial uses include surface parking lots, 1- and 2-story retail shops, restaurants, high-rise office buildings and The Peninsula Hotel.
- **West.** Directly west of the project site is the Los Angeles Country Club (a golf course), and the community of Century City in the City of Los Angeles farther to the west. Century City is characterized by a concentration of high-rise residential towers along the Santa Monica Boulevard corridor and office towers farther west and south.

10. Other Public Agencies Whose Approval is Required

None

11. Tribal Consultation

The City has initiated the tribal consultation process, as required under Public Resources Code (PRC) Section 21080.3.1 and consistent with Assembly Bill (AB) 52 and Senate Bill (SB) 18.

Senate Bill 18 of 2004

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "The intent of SB 18 is to provide California

Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

As required by SB 18, the Native American Heritage Commission (NAHC) was contacted to request a Sacred Lands File (SLF) search of the project site and a 0.25-mile radius surrounding it. The purpose of the SLF search is to identify lands or resources important to Native Americans and to assess the potential for project-related development to impact Native American resources. A request for a list of California Native American Tribes traditionally affiliated with the project area was submitted to the NAHC on July 24, 2020. On July 27, 2020, the NAHC provided the contact information for six tribes culturally affiliated with the project area: Soboba Band of Luiseño Indians, Gabrielino-Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, and Gabrieleño Band of Mission Indians – Kizh Nation. On August 21, 2020 the City mailed a notification letter to the six tribes requesting consultation.

Assembly Bill 52 of 2014

California Assembly Bill 52 of 2014 (AB 52) went into effect in July 2015, expanding CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" that are either:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments, and respecting the interests and roles of project proponents, it is the intent of AB 52 to accomplish the following:

1. Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities.
2. Establish a category of resources in CEQA called "tribal cultural resources" that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation.
3. Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible.
4. Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated. Because CEQA calls for a sufficient degree of analysis, tribal

knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources.

5. In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, at the earliest possible point in CEQA environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision making body of the lead agency.
6. Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to CEQA.
7. Ensure that local and tribal governments, public agencies, and project proponents have information available, early in the CEQA environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources and to reduce the potential for delay and conflicts in the environmental review process.
8. Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources.
9. Establish that a substantial adverse change to a tribal cultural resource has a significant effect on the environment.

AB 52 also establishes a formal consultation process for California tribes regarding tribal cultural resources. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

On August 21, 2020, the City initiated the Native American consultation process under AB 52 by sending letters to the NAHC identified Native American groups and individuals (Soboba Band of Luiseño Indians, Gabrielino-Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, and Gabrieleño Band of Mission Indians – Kizh Nation) in an effort to identify any tribal cultural resources within the project site and/or its vicinity and to address any potential impacts to tribal cultural resources resulting from project-related development.

A summary of the SB 18 and AB 52 consultation will be included in the SEIR.

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Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is due to a " Substantial Change in Project That May Require Major EIR Revisions," "Substantial Change in Circumstances That May Require Major EIR Revisions," or "New Information Showing Potentially New or Greater Significant Effects than Previous EIR" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	■	Air Quality
■	Biological Resources	■	Cultural Resources	☐	Energy
■	Geology/Soils	■	Greenhouse Gas Emissions	■	Hazards and Hazardous Materials
☐	Hydrology/Water Quality	■	Land Use/Planning	☐	Mineral Resources
■	Noise	☐	Population/Housing	■	Public Services
☐	Recreation	■	Transportation	■	Tribal Cultural Resources
■	Utilities/Service Systems	☐	Wildfire	■	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

■ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. A SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

9/2/2020

Date

Masa Alkire, AICP

Printed Name

Principal Planner

Title

Environmental Checklist

The environmental analysis contained in this checklist assesses potential environmental impacts of the proposed project and compares the impacts of the currently proposed project to those previously analyzed in the environmental documentation for the Existing Specific Plans.

1 Aesthetics

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Except as provided in Public Resources Code Section 21099, would the project:					
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☐	■
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	■	☐

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☐	■	☐

Existing Setting

The project site is located in an urban area immediately surrounded by one- and two-story commercial uses to the east and south across Santa Monica Boulevard, as well as one- and two-story single-family residences and a school (El Rodeo School) to the north across Wilshire Boulevard. Immediately to the west of the project site is the Los Angeles County Club golf course, and to the south of the project site's southern corner across Santa Monica Boulevard is a five-story commercial building and a 40-story residential building. The Beverly Hilton Site is developed with the Beverly Hilton, which currently includes the eight-story Wilshire Tower, the four-story Palm/Oasis Court Hotel, the 12-story Waldorf-Astoria, and ancillary hotel facilities. The 9900 Wilshire Boulevard Site is vacant, and the 9988 Wilshire Boulevard Site includes a gas station and convenience store.

Public Resources Code 21099(d)(1)

On January 1, 2014, Senate Bill (SB) 743 became effective, adding Section 21099 to the CEQA Statute in PRC Division 13 to streamline CEQA review for development projects located on urban infill sites within transit priority areas. PRC Division 13, Section 21099(d)(1) states, "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099(d)(2)(A) states that this "does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies." In addition, PRC Section 21099(d)(2)(B) states that, "aesthetic impacts do not include impacts on historical or cultural resources" (e.g., impacts to historic viewsheds, which will be discussed in the SEIR under "Cultural Resources").

At the time of approval of the Beverly Hilton Specific Plan and certification of its EIR, SB 743 had not been enacted and was not in effect. As such, the Beverly Hilton Specific Plan 2008 EIR did not utilize this streamlining process. In addition, the 9900 Wilshire Specific Plan 2016 SEIR did not utilize this streamlining process. However, the proposed project would qualify for the streamlining process provided in PRC Section 21099(d)(1) based on the following criteria:

- The proposed project is located on an infill site, defined as a lot located within an urban area (i.e., the City of Beverly Hills) that has been previously developed (PRC Section 21099[a][4]). According to PRC Section 21071, although the City has a population of less than 100,000, the City of Beverly Hills qualifies as an urban area because the population of the City and two

contiguous incorporated cities (i.e., the City of Los Angeles and the City of West Hollywood) is at least 100,000 (California Department of Finance [CDOF] 2020).[6]

- The project site is located in a transit priority area, defined as an area within 0.5 mile of a major transit stop that is existing or planned (PRC Section 21099[a][7]). The definition of a major transit stop includes sites containing the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (PRC Section 21064.3).[7] The project site is immediately adjacent to the Wilshire Boulevard/Santa Monica Boulevard and Wilshire Boulevard/Whittier Drive bus stops that service several bus routes, including but not limited to LA Metro Lines 20 and 720, which run along Wilshire Boulevard, and Lines 4 and 704, which run along Santa Monica Boulevard. These bus routes have service intervals of 15 minutes or less during peak hours.

Therefore, the proposed project's aesthetic impacts are not considered significant due to the provisions of PRC Section 21099(d). Accordingly, the analysis of the proposed project's aesthetic impacts is provided for informational purposes only.

a. Would the project have a substantial adverse effect on a scenic vista?

The Beverly Hilton Specific Plan 2008 EIR (City of Beverly Hills 2008a) determined that the Beverly Hilton Specific Plan would have a significant and unavoidable impact due to the loss of one of three historically significant viewsheds of the Wilshire Tower from the intersection of Wilshire Boulevard and Santa Monica Boulevard. This historic viewshed of the Wilshire Tower was eliminated with the construction of the Waldorf-Astoria under the Beverly Hilton Specific Plan. The Beverly Hilton Specific Plan 2008 EIR also states that the Residences A building under the Beverly Hilton Specific Plan would obstruct existing uninterrupted panoramic west-facing views from the Wilshire Tower. This view obstruction would only affect on-site uses, specifically hotel guests. The Beverly Hilton Specific Plan 2008 EIR concludes that this impact would be significant with no feasible mitigation measures to reduce its significance. The original 9900 Wilshire Specific Plan 2008 EIR also found that the 2008 9900 Wilshire Specific Plan would adversely affect panoramic west-facing views from guestrooms in the Beverly Hilton Hotel's Wilshire Tower. Project impacts to historic viewsheds are not exempt pursuant to 21099(d) and, therefore, will be studied further in the SEIR, under "Cultural Resources."

With respect to non-historic scenic vistas, the Beverly Hilton Specific Plan 2008 EIR determined that no other valued views would be significantly obstructed or interrupted (City of Beverly Hills 2008a). The 9900 Wilshire Specific Plan 2016 SEIR (City of Beverly Hills 2016) states that the 9900 Wilshire Specific Plan would result in no new impacts to scenic views and vistas beyond those identified in the original 9900 Wilshire Specific Plan 2008 EIR, which concluded that significant and unavoidable impacts to scenic views and vistas would occur due to the increased development density and building heights on the project site.

Although the proposed project's aesthetic impacts are not considered significant due to the provisions of PRC Section 21099(d), the following discussion considers the project's impact to four public viewsheds of the project site and is provided for informational purposes only. Figure 5 shows the location of these viewsheds, and existing views plus conceptual simulations of the proposed

[6] The population of the City of Beverly Hills is approximately 33,775. The combined population of the cities of Beverly Hills, West Hollywood, and Los Angeles is approximately 4,080,662 (CDOF 2020).
[7] The morning peak commute period is generally from 7:00 a.m. to 9:00 a.m., and the afternoon peak commute period is generally from 4:00 p.m. to 6:00 p.m.

project from the four public viewsheds are shown in Figure 6 through Figure 9. Each public vantage point is discussed below.

Viewshed A (9900 Wilshire Boulevard)

As shown in Figure 6, the vantage point associated with Viewshed A is north of Wilshire Boulevard near the Beverly Hills-Los Angeles city boundary and adjacent to the northwest corner of the project site. The Wilshire Tower is visible in the distance and grows more prominent as motorists travel east on Wilshire Boulevard towards the project site. The Union 76 service station is visible in front of the Beverly Hilton, and the Waldorf-Astoria, constructed as part of the Beverly Hilton Specific Plan, is visible behind the Wilshire Tower.

The proposed project would replace the existing gas station with the 124-feet tall Wilshire Building as the prominent feature in this viewshed. The proposed Garden Residences and Santa Monica Residences would also be visible from this vantage point. The Wilshire Building would be similar in height to development allowed under the Existing Specific Plans, but would shift building massing closer to Wilshire Boulevard in the northeast corner of the project site, in comparison to buildings approved under the Existing Specific Plans. Although building heights under the proposed project would be greater than those allowed under the Existing Specific Plans and building massing would be more prominent in foreground views, no valued focal or panoramic views would be obstructed from this vantage point by the proposed project. Therefore, the proposed project would not result in new or more severe impacts to Viewshed A beyond those identified in the Beverly Hilton Specific Plan 2008 EIR and 9900 Wilshire Specific Plan 2016 SEIR (hereafter referred to collectively as "previous environmental documentation").

Viewshed B (Wilshire Boulevard and Santa Monica Boulevard)

As shown in Figure 7, Viewshed B encompasses the view from a vantage point near the intersection of Wilshire Boulevard and Santa Monica Boulevard, near the northeast corner of the project site. This viewshed is currently dominated by the Waldorf-Astoria in the foreground. The proposed Garden Residences, Santa Monica Residences, and Wilshire Building would be visible from this vantage point in the background of the Waldorf-Astoria and Wilshire Tower. Although building heights under the proposed project would be greater than those allowed under the Existing Specific Plans, no valued focal or panoramic views would be obstructed from this vantage point by the proposed project. Therefore, the proposed project would not result in new or more severe impacts to Viewshed B beyond those identified in the previous environmental documentation.

Viewshed C (Santa Monica Boulevard Split)

Figure 8 shows the view from Viewshed C, which is located at the Santa Monica Boulevard split near the southwest corner of the project site. The foreground is currently dominated by street trees along Santa Monica Boulevard with distant views of the Waldorf-Astoria. Under the proposed project, the Santa Monica Residences and Garden Residences would be the predominant features in this viewshed and would be greater in height than development allowed under the Existing Specific Plans. Although building heights under the proposed project would be greater than those allowed under the Existing Specific Plans, no valued focal or panoramic views would be obstructed from this vantage point by the proposed project. Therefore, the proposed project would not result in new or more severe impacts to Viewshed C beyond those identified in the previous environmental documentation.

Viewshed D (Charleville Boulevard and Durant Drive)

Figure 9 shows the existing view from Viewshed D, which is located at the intersection of Charleville Boulevard and Durant Drive. The foreground is currently dominated by existing low-rise residential development. The Ten Thousand, a 40-story residential building located at 10000 Santa Monica Boulevard, is visible in the distance. Under the proposed project, the Santa Monica Residences and Garden Residences would be visible in the background and would appear similar in scale to Ten Thousand. Although building heights under the proposed project would be greater than those allowed under the Existing Specific Plans, no valued focal or panoramic views would be obstructed from this vantage point by the proposed project. Therefore, the proposed project would not result in new or more severe impacts to Viewshed D beyond those identified in the previous environmental documentation.

Summary

With respect to non-historic scenic vistas, although the proposed project would result in an increase in overall building height on the project site and would shift residential building massing to the west as compared to the Existing Specific Plans, the project would not result in new or more severe impacts to valued focal or panoramic views beyond those identified in the previous environmental documentation. The proposed Garden Residence and Santa Monica Residences would obstruct more views of the sky from the surrounding areas as compared to the shorter development allowed under the Existing Specific Plans. However, the increased obstruction of a portion of the sky would be incremental, compared to the overall viewshed, and the sky is not considered a scenic resource.

The proposed project would have less than significant impacts to scenic vistas, and in any event, PRC Section 21099(d) precludes the City from finding that the proposed project would have a significant impact to scenic vistas. Therefore, the proposed project would not result in new or more severe impacts to scenic vistas beyond those identified in the previous environmental documentation. Further analysis of this issue is not warranted. Project impacts to historic viewsheds are not exempt pursuant to 21099(d) and, therefore, will be studied further in the SEIR, under “Cultural Resources.”

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

Figure 5 Viewshed Location Map



Figure 6 Viewshed A: 9900 Wilshire Boulevard



Existing View



Proposed Project View

Source: Gensler August 2020. Note looking south into project site.

Figure 7 Viewshed B: Wilshire Boulevard and Santa Monica Boulevard



Existing View



Proposed Project View

Source: Gensler, August 2020. Note looking west towards project site.

Figure 8 Viewshed C: Santa Monica Boulevard Split



Existing View



Proposed Project View

Source: Gensler, August 2020. Note looking northeast towards project site.

Figure 9 Viewshed D: View from Charleville Boulevard and Durant Drive



Existing View



Proposed View

Source: Gensler, August 2020. Note looking northwest towards project site.

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

The project site is developed and located within an urban setting. As discussed in the previous environmental documentation, there would be no impact to scenic resources, noting the absence of state-designated scenic highways within or adjacent to the project site (California Department of Transportation n.d.; City of Beverly Hills 2008a, 2010, and 2016). The project site is only briefly visible from the scenic segment of Wilshire Boulevard[8] because of its angle relative to the project site and intervening development. Although the proposed project would involve a site plan with building heights up to 410 feet, compared to the Existing Specific Plans (with heights up to 200 feet, measured from a datum of 285 feet), the project would not damage trees, rock outcroppings, or historic buildings within view of a state scenic highway as there are no state designated scenic highways in the vicinity of the project site. Because the project site is not located along a state scenic highway and would not damage scenic resources within view of a state scenic highway, no impact would occur. Further analysis of this issue is not warranted.

NO IMPACT

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

Under the Existing Specific Plans, allowed development ranges in height from 17 to 200 feet. The Beverly Hilton Specific Plan 2008 EIR concludes that, although allowed development would alter the visual character of the project site and surroundings primarily by increasing the intensity of development on the project site with residential buildings along Santa Monica Boulevard North and Wilshire Boulevard, impacts to visual character and quality would be less than significant because the Residences A building was shorter in height than the Wilshire Tower and allowed development included building setbacks and open space along Wilshire Boulevard and Merv Griffin Way that provided a better visual transition between surrounding land uses (City of Beverly Hills 2008a). The 9900 Wilshire Specific Plan 2016 SEIR states that significant and unavoidable impacts to visual character would occur due to the proposed change in character of the 9900 Wilshire Boulevard site to residential and commercial land uses as well as increasing development density and building heights on this portion of the site.

The proposed project would increase the allowed height on the project site to 410 feet. Increased development intensity and building heights under the proposed project would not conflict with Objective 3, Areas of Transitional Conflict, and Objective 4, Scale of the City, of the Land Use Element of the City's 1977 General Plan because the project would be consistent with and implement the provisions of Section 2.2 of the Land Use Element, as amended in conjunction with the 2008 Wilshire Specific Plan (City of Beverly Hills 2008a). Section 2.2 of the amended 1977 General Plan designates anchor locations that serve as gateway locations to be appropriate for higher-intensity development and greater building heights. In 2010, the City updated the General Plan, including the Land Use Element. The current (2010) General Plan continues to designate the project site as the "Beverly Hilton Specific Plan," "9900 Wilshire Specific Plan," and low-density general commercial. The Land Use Element sets goals for maintaining the existing scale, character,

[8] This segment of Wilshire Boulevard is considered scenic due to the landscaped parkways and street trees.

built form, and aesthetic qualities of the city (Policies LU 1.1 and 2.1); requiring high-quality architecture that complements existing development (Policy LU 2.4); allowing renovations of historic sites and buildings provided that new construction contextually fits and complements the site or building (Policy LU 2.6); assuring functional and visual transitions between areas of differing uses (Policy LU 2.10); and allowing for higher-intensity development and greater building heights at anchor locations near city gateways (Policy LU 9.3).

The scale and massing of the proposed project would be generally compatible with other urban development on Santa Monica Boulevard in Century City located approximately 0.1 mile southwest of the project site, where buildings of similar scale are located. The 124-foot tall Wilshire Building would be similar in height to the exiting 150-foot tall Waldorf-Astoria building. However, the 369-foot tall Garden Residences and 410-foot tall Santa Monica Residences contemplated by the proposed project would exceed the height of the existing Beverly Hilton (95 feet) and Waldorf-Astoria and the maximum building heights outlined in the Existing Specific Plans (97 and 200 feet for Residences A and Residences B, respectively, in the Beverly Hilton Specific Plan and 161 and 185 feet for North Building and South Building, respectively, in the 9900 Wilshire Specific Plan). The Garden Residences and Santa Monica Residences would be substantially taller than existing surrounding development in the city and would be visible from the surrounding streets and nearby open space and residential uses, as shown in Figure 6 through Figure 9. Nonetheless, as shown in Figure 7 and Figure 9, the proposed project would contribute to a gradual increase in building heights along Santa Monica Boulevard beginning with the 12-story Waldorf-Astoria on the eastern portion of the project site and moving west to the high-rise development within Century City, including Ten Thousand, a 40-story residential building located at 10000 Santa Monica Boulevard. In addition, the project would be consistent with Policy LU 9.3, which allows higher-intensity development at anchor locations, including the project site.

The proposed project would have less of a visual character impact related to transitional areas, when compared to the Existing Specific Plans. The proposed project would set back the high-density residential development on the western portion of the project site and place the 31-foot tall new conference center and 124-foot Wilshire Building along Wilshire Boulevard with landscaped gardens in between, which would act as a visual buffer between the proposed high-density residential development on-site and nearby low-density residential and school areas to the north of the project site. In addition, the proposed project's gardens would enhance visual quality of the project site and would be designed to enhance the garden quality of the City, as required by the Beverly Hilton Specific Plan. Therefore, the proposed project would be more consistent with the visual character goals set forth by the City's General Plan Land Use Element Policies LU 2.6 and LU 2.10, when compared with the Existing Specific Plans. Nonetheless, the proposed project would still introduce an abrupt change in development intensity by constructing high-density residential development near low-density residential land uses.

The proposed buildings would reflect modern architecture design principles. Similar to the Existing Specific Plans, the architectural design of the proposed buildings would also honor the original Welton Becket architecture of the Wilshire Tower. Therefore, the proposed project would be consistent in visual character and quality with existing on-site development.

The proposed project would alter the visual character of the project site and surroundings primarily by increasing maximum building height on the western portion of the project site. Nonetheless, the proposed project would not result in a new significant impact nor increase the severity of the previously identified less than significant impact for the Beverly Hilton Specific Plan or the significant and unavoidable impact for the 9900 Wilshire Specific Plan. In any event, PRC Section 21099(d)

precludes the City from finding that the proposed project would have a significant impact to visual character and quality. Therefore, the proposed project would not result in new or more severe significant impacts to visual character and quality above those identified in the certified EIRs, and further analysis of this issue is not warranted.

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Light

The previous environmental documentation concluded that the allowed development would increase ambient nighttime light levels on the project site and illuminated buildings and outdoor areas would be visible from some off-site vantages (City of Beverly Hills 2008a and 2016). Per the previous environmental documentation, the potential for unshielded or misdirected light sources to adversely affect nighttime views is identified as a significant, but mitigable, impact. The Beverly Hilton Specific Plan 2008 EIR and the 9900 Wilshire Specific Plan 2016 SEIR incorporated Mitigation Measure MM-LG-1, which would also apply to the proposed project, requiring lights to be shielded and directed downwards to reduce light spillover to reduce light impacts to nighttime views to less-than-significant levels.

BHMC Section 5-6-1101 prohibits the installation, use, or maintenance of any lighting that creates an intensity of light on residential property that is greater than one foot-candle above ambient light level. On-site lighting plans would be reviewed by the Community Development Department as part of the plan check prior to the issuance of building permits to enforce this requirement. Furthermore, pursuant to PRC Section 21099(d), the proposed project's light impacts would not be considered significant impacts , although the proposed project would still be required to implement Mitigation Measure MM-LG-1 as required by the previous environmental documentation.

Glare

The intensity of daytime or nighttime glare[9] and reflectivity is dependent on the types of building materials used. The potential for thermal glare is dependent on the presence of concave surfaces as well as the types of building materials used. The previous environmental documentation concluded that operational glare impacts would be less than significant based on the building siting and use of low-reflectivity building materials (City of Beverly Hills 2008a and 2016). The proposed buildings would not include concave surfaces; therefore, the potential for thermal glare is low. In addition, the development standards under Section 10-3-1955, *Commercial-Residential Transition; General Development Requirements*, of the BHMC would apply to the proposed project. These standards prohibit mirrored or reflective glass or material used on the façades of buildings, structures, and improvements that face any residential use.

The proposed project would shift residential building massing to the west, in comparison to buildings approved under the Existing Specific Plans and would introduce a building on a portion of the site (9988 Wilshire Boulevard) not previously considered. In addition, the 369-foot tall Garden Residences and 410-foot tall Santa Monica Residences would be taller than the allowed development under the Existing Specific Plans, which allows for heights up to 200 feet (measured

[9] Daytime glare is typically caused by the reflection of sunlight from highly reflective surfaces such as buildings clad with broad expanses of highly polished surfaces or with broad, light-colored areas of paving. Nighttime glare refers to direct, intense, focused light, as well as reflected light, and hampers visibility. Nighttime glare generally originates from mobile, and therefore transitory, sources, such as automobiles, and from particularly intense, stationary sources, such as floodlights.

from a datum of 285 feet). The additional floors could incrementally increase reflected sunlight from windows and light-colored exterior surfaces during certain times of the day and could potentially increase the glare associated with the project site as compared to the Existing Specific Plans. Specifically, during the afternoons, when the sun is to the west of the project site, the increased height of the buildings could incrementally increase the amount of reflectivity of the sun on the western side of the proposed buildings, which could result in an incremental increase in glare to viewers along Santa Monica Boulevard located west of the project site who are looking eastward. Overall, the increased height of the buildings under the proposed project would only incrementally increase glare from the project site because building materials facing residential uses would be required to be low in reflectivity under BHMC Section 10-3-1955, *Commercial-Residential Transition; General Development Requirements*. In addition, the proposed buildings include landscaped terraces and balconies, reducing the glazed exterior that would be directly exposed to sunlight in comparison to buildings approved under the 9900 Wilshire Specific Plan. Both proposed buildings would have an oval footprint and are generally oriented in a northeast-southwest direction so that the narrow elevation of the buildings face the existing Beverly Hills residential areas north of the project site, reducing glare impacts to potentially sensitive uses. Impacts related to glare would be less than significant, and in any event, PRC Section 21099(d) precludes the City from finding that the proposed project would have a significant impact related to glare.

Shade and Shadow

The City of Beverly Hills has not adopted specific thresholds to assess project-related shade and shadow nor light and glare impacts, but as a matter of standard practice, has utilized the applicable thresholds from the City of Los Angeles' CEQA Thresholds Guide. For shade and shadow, a project may have a significant impact if shadow-sensitive uses would be shaded by project-related structures for more than:

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

The previous environmental documentation (City of Beverly Hills 2008a and 2016) states that the allowed development would cast shadows from its buildings to the north, east, and west, but that shadow impacts would be less than significant. A shadow analysis was performed by Foster and Partners (2020; see Appendix A) to determine how the proposed project would affect nearby outdoor uses (Figure 10 through Figure 19; see Appendix A for all shadow studies). The shadow models show shadows cast by on-site buildings and buildings in the immediate vicinity. However, the models do not account for shadows cast by trees. The north and south sides of Wilshire Boulevard along the project site are lined with tall palm trees with relatively small trunk diameters. In addition, the Wilshire Gardens Park on the north side of Wilshire Boulevard is heavily lined with dense-canopied trees. These existing trees would also cast shadows on nearby sensitive receptors.

Prolonged periods of shade and shadow can negatively affect the character of certain land uses. Shadow-sensitive uses near enough to the project site to potentially be impacted include the schoolyard of El Rodeo School to the northwest, the Los Angeles Country Club to the west and north, Beverly Gardens Park along Wilshire Boulevard to the north, single-family residential uses north of Beverly Gardens Park, and residences south of the project site along Durant Drive and Charleville Boulevard. El Rodeo School is currently undergoing construction, which would include

removal of the mobile classrooms adjacent to Wilshire Boulevard and Whittier Drive, and expansion of the school yard in their place to include an artificial turf field and more basketball courts (Beverly Hills Unified School District 2018). Construction at El Rodeo School is expected to be completed by the 2021-2022 school year, prior to completion of proposed project construction. For the purposes of this analysis, impacts to the expanded school yard at El Rodeo School are considered as it would be operational at the time the project is constructed.

Summer Solstice Analysis

The estimated summer solstice (June 21) shadows generated by the proposed project are illustrated in Figure 10 through Figure 13. As detailed above, a project may have a significant impact if shadow-sensitive uses would be shaded by project-related structures for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time between early April and late October. The approved buildings under the Existing Specific Plans would shade the Los Angeles Country Club's South Golf Course in the morning hours (from at least 7:30 a.m. to noon). The proposed buildings would cast longer and larger shadows than the Existing Specific Plan buildings, and would also shade the Los Angeles Country Club's South Golf Course from at least 7:30 a.m. to noon. Therefore, while the proposed project would shade a larger area than the Existing Specific Plan, it would not increase the amount of time that Los Angeles Country Club's South Golf Course, a shadow-sensitive use, is in shade, in comparison to the Existing Specific Plan, and would not shade the property for more than four hours between 9:00 a.m. and 5:00 p.m. from early April to late October.

In the evening, the approved buildings under the Existing Specific Plans would shade residences south of the project site along Durant Drive from after 6:00 p.m. to 8:00 p.m., when shadows become indistinguishable from general darkness because of the setting sun. The proposed buildings would cast shade on these residences south of the project site sooner than the approved buildings under the Existing Specific Plans, starting at approximately 5:00 p.m. and ending by 8:00 p.m. (when shadows become indistinguishable), and would cast longer shadows than the approved buildings under the Existing Specific Plans. However, the proposed project would not shade shadow-sensitive uses south of the project site for any time between 9:00 a.m. and 5:00 p.m. from early April to late October. Shadows would not be cast onto any other shadow-sensitive uses. Therefore, shadow impacts from the proposed project would be less than significant during that part of the year.

Winter Solstice Analysis

The estimated winter solstice (December 21) shadows generated by the proposed project are illustrated in Figure 14 through Figure 19. As detailed above, a project may have a significant impact if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time between late October and early April. The approved buildings under the Existing Specific Plans would shade the Los Angeles Country Club's South and North Golf Courses in the morning hours (from at least 7:30 a.m. to 8:30 a.m.). The proposed buildings would cast longer shadows than the Existing Specific Plan buildings, but would only shade the Los Angeles Country Club's South and North Golf Courses in the morning hours (from at least 7:30 a.m. to 10:00 a.m.), or for one hour between the hours of 9:00 a.m. and 3:00 p.m. This is less than the applicable three hour threshold for this time period. Therefore, shadow impacts of the proposed project to the Los Angeles Country Club's South and North Golf Courses would be less than significant during that part of the year.

The approved buildings under the Existing Specific Plans would shade the expanded schoolyard of El Rodeo School to the northwest from at least 7:30 a.m. to 3:00 p.m., Beverly Gardens Park to the

north from 2:30 p.m. to 4:00 p.m. (when shadows become indistinguishable from general darkness because of the setting sun), and residences north of Beverly Gardens Park from 3:00 p.m. to 4:00 p.m. The proposed buildings would cast longer shadows than the Existing Specific Plan buildings and would shade the expanded schoolyard of El Rodeo School from 7:30 a.m. to 4:00 p.m., and Beverly Gardens Park to the north and residences north of Beverly Gardens Park from 11:30 a.m. to 4:00 p.m. The proposed buildings would cast shadows on shadow-sensitive uses for longer than the approved buildings under the Existing Specific Plans, and would cast longer shadows. In addition, the proposed buildings would shade shadow-sensitive uses north of the project site for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time between late October and early April. Accordingly, shade/shadow impacts associated with the proposed project would be potentially significant during that part of the year.

In conclusion, shade/shadow impacts under the proposed project would be greater than shade/shadow impacts identified in the previous environmental documentation. The proposed project would result in greater shading of the expanded El Rodeo schoolyard, Los Angeles Country Club's South and North Golf Courses, Beverly Gardens Park, and residences north of Beverly Gardens Park from late October through early April. Moreover, the proposed project would exceed the City's typically used significance thresholds for shade/shadow impacts between late October and early April at El Rodeo School, Beverly Gardens Park, and residences north of Beverly Gardens Park. However, PRC Section 21099(d) precludes the City from finding that the proposed project would have a significant impact related to shade and shadow. Therefore, impacts would not be significant.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

Figure 10 Shadow Analysis – Summer Solstice (June 21) at 7:30 AM



Source: Foster and Partners 2020

Figure 11 Shadow Analysis – Summer Solstice (June 21) at 9:00 AM



Source: Foster and Partners 2020

Figure 12 Shadow Analysis – Summer Solstice (June 21) at 12:00 PM



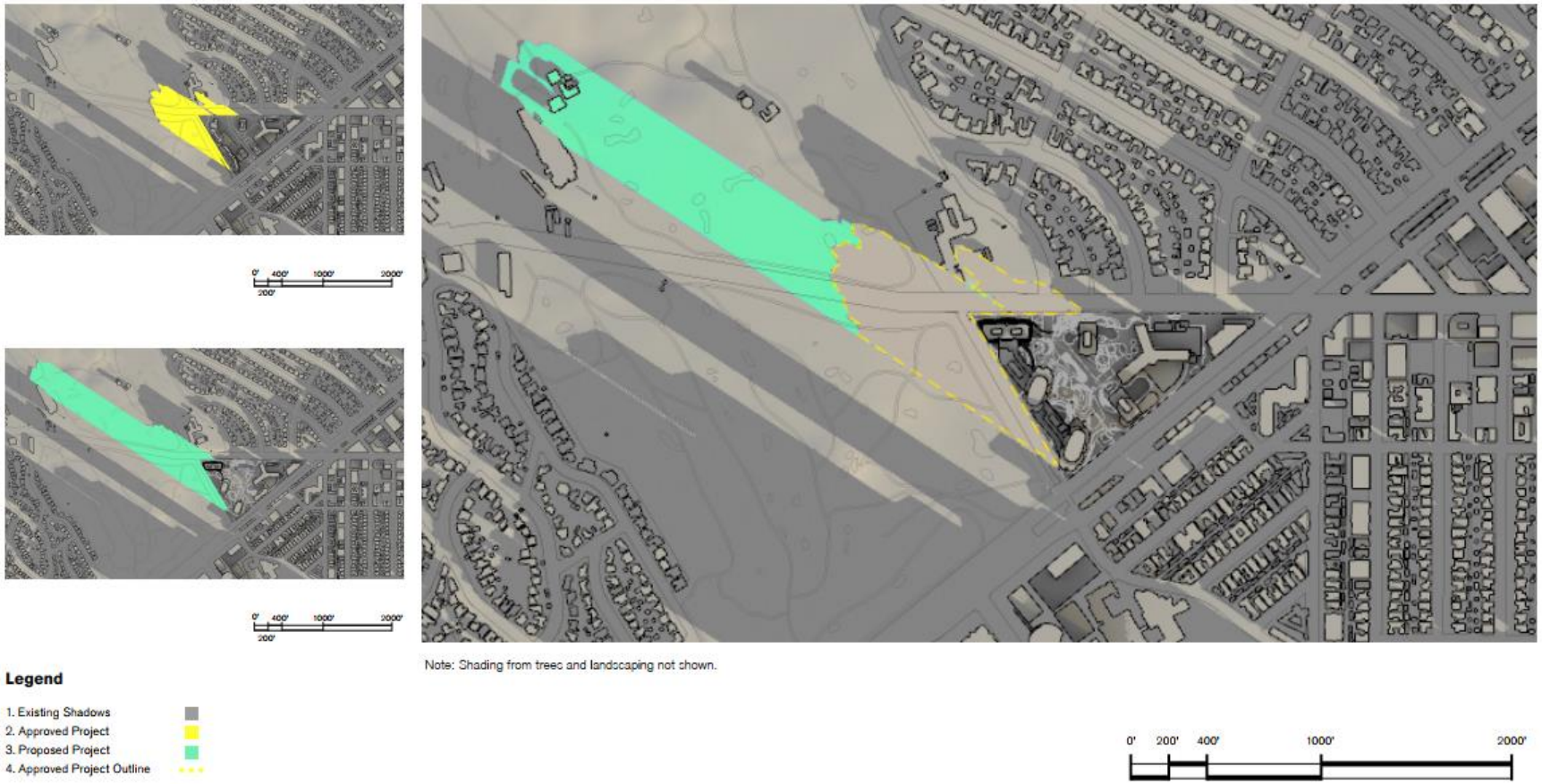
Source: Foster and Partners 2020

Figure 13 Shadow Analysis – Summer Solstice (June 21) at 5:00 PM



Source: Foster and Partners 2020

Figure 14 Shadow Analysis – Winter Solstice (December 21) at 7:30 AM



Source: Foster and Partners 2020

Figure 15 Shadow Analysis – Winter Solstice (December 21) at 9:00 AM



Source: Foster and Partners 2020

Figure 16 Shadow Analysis – Winter Solstice (December 21) at 9:30 AM



Figure 17 Shadow Analysis – Winter Solstice (December 21) at 11:30 AM



Figure 18 Shadow Analysis - Winter Solstice (December 21) at 12:00 PM



Source: Foster and Partners 2020

Figure 19 Shadow Analysis – Winter Solstice (December 21) at 3:00 PM



Source: Foster and Partners 2020

2 Agriculture and Forestry Resources

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐	■
b. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland					

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
(as defined by Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☐	■

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

The project site is developed and located within an urban setting. As discussed in the previous environmental documentation, no Farmland, agricultural use, areas zoned for agricultural use, or land subject to a Williamson Act contract exists on the project site, including 9988 Wilshire Boulevard, or its vicinity (City of Beverly Hills 2008a and 2016). Therefore, the proposed project

would not result in impacts to agricultural resources and further analysis of this issue is not warranted.

NO IMPACT

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The project site is developed and located within an urban setting. As discussed in the previous environmental documentation, no forest land or timberland exists on or is zoned for the project site or its vicinity (City of Beverly Hills 2008a and 2016). The gas station site also is not located on or near forest land or timberland (City of Beverly Hills 2008b). Therefore, the proposed project would not result in impacts to forest or timberland resources and further analysis of this issue is not warranted.

NO IMPACT

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

The project site is developed and located within an urban setting. As discussed in the previous environmental documentation, no agricultural land uses exist on the project site or its vicinity (City of Beverly Hills 2008a and 2016). The gas station site also is not located on or near agricultural land uses (City of Beverly Hills 2008b). Furthermore, there is no land within the City zoned for forest land or timber production (City of Beverly Hills 2008b). Accordingly, the proposed project would not result in changes in the existing environment that would convert Farmland to non-agricultural use or forest land to non-forest use. Further analysis of this issue is not warranted.

NO IMPACT

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3 Air Quality

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?	■	□	□	□	□
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	■	□	□	□	□
c. Expose sensitive receptors to substantial pollutant concentrations?	■	□	□	□	□
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	□	□	□	□	■

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Previous environmental documentation concluded during the construction under the Existing Specific Plans, oxides of nitrogen (NO_X) emissions would exceed established thresholds of significance, even with compliance with South Coast Air Quality Management District (SCAQMD) Rule 403 – Fugitive Dust, and that such an impact would be potentially significant (City of Beverly

Hills 2008a and 2016). The Beverly Hilton Specific Plan 2008 EIR and 9900 Wilshire Specific Plan 2016 SEIR included Mitigation Measures MM-AQ-1 through MM-AQ-14 and MM-AQ-1 through MM-AQ-13, respectively, to reduce air quality impacts associated with construction of the Existing Specific Plans (City of Beverly Hills 2008a and 2016). However, the previous environmental documents concluded potential impacts associated with the short-term pollutant emissions during construction of the Existing Specific Plans would remain significant and unavoidable after implementation of mitigation measures. The previous environmental documentation concluded operation of the Existing Specific Plans would not result in criteria air pollutant emissions that would exceed SCAQMD thresholds (City of Beverly Hills 2008a and 2016).

The proposed project would involve alterations to the grading and development plans for the project site as well as changes to the layout of the site. As such, the proposed project may alter temporary construction-related and long-term operational emissions that could expose sensitive receptors to pollutants and/or conflict with the applicable air quality plan. Therefore, these issues will be studied further in the SEIR. In addition, the SEIR will consider the mitigation measures included in the previous environmental documentation and incorporate and/or revise them as applicable based on new information and project features.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

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

A project-related significant adverse effect could occur if construction or operation of the proposed project would result in generation of odors that would be perceptible in adjacent sensitive areas. According to the SCAQMD *CEQA Air Quality Handbook*, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The construction and operation of the proposed hotel/commercial and residential components would not introduce any land uses or industrial operations that are associated with odor complaints on the project site. The proposed project would also comply with SCAQMD Rule 402, which prohibits the discharge of air contaminants that would cause injury, detriment, nuisance, or annoyance to the public.

The proposed project would not alter the types of uses permitted under the Existing Specific Plans. Previous environmental documentation concluded odors from construction would occur primarily from the use of construction equipment on the project site and would be temporary and less than significant (City of Beverly Hills 2008a and 2016). Odors from hotel/commercial and residential uses during project operation would occur primarily from food preparation activities and disposal of refuse. Odors from food preparation on the project site would be similar to odors from existing commercial and residential uses surrounding the project site. In addition, the SCAQMD controls emissions from restaurant operations under Rule 1138, thus preventing objectionable odors from affecting surrounding land uses. With regard to refuse disposal, the residential and commercial components of the proposed project would dispose of waste in appropriate trash containers, which would be covered and closed as required by the Beverly Hills Municipal Code.

Therefore, no impact associated with odors would result and further analysis of this issue is not warranted.

NO IMPACT

4 Biological Resources

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	■	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	■	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh,					

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	■	☐	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	■	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	■	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	■	☐	☐

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project site and vicinity are developed, located within an urban setting, and void of any endangered, threatened, or special-status species or their habitats; locally designated species (including protected oak trees); riparian habitat or other sensitive natural community; state or federally protected wetlands; or wildlife corridors or nursery sites. The site and its vicinity are also not within the area of any adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan (City of Beverly Hills 2008a and 2016).

Previous environmental documentation concluded the Existing Specific Plans would not have any significant impacts on biological resources (City of Beverly Hills 2008a and 2016). The proposed project would include approximately 10 acres of open space, eight of which is landscaped space, not contemplated in the Existing Specific Plans. In response to comments provided during the Notice of Preparation scoping period, the project's impacts to biological resources will be studies in the SEIR.

NEW INFORMATION SHOWING POTENTIALLY NEW OR GREATER SIGNIFICANT EFFECTS THAN PREVIOUS EIR

5 Cultural Resources

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	■	□	□	□	□
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	□	□	■	□	□
c. Disturb any human remains, including those interred outside of formal cemeteries?	□	□	■	□	□

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Previous environmental documentation concluded the project site includes resources potentially eligible for listing on the National Register of Historic Places and California Register of Historic Resources, including the Wilshire Edge building, Wilshire Boulevard pedestrian entrance, pool, former Trader Vic's restaurant, the Robinsons-May Building, and 16 streetlights and three street signs (City of Beverly Hills 2008a, 2008c, and 2016). Some of these potentially historic resources would be demolished as part of the Existing Specific Plans (City of Beverly Hills 2008a, 2008c, and 2016). Demolition is considered a substantial adverse change of the significance of a historical resource under Section 15064.5(b)(1) of the CEQA Guidelines, which would be a significant impact.

The Beverly Hilton Specific Plan 2008 EIR included Mitigation Measures MM-CR-1 through MM-CR-3 to reduce potential impacts to historic resources. The Beverly Hilton Specific Plan 2008 EIR concluded demolition of portions of the Beverly Hilton, including the Wilshire Edge building, Wilshire Boulevard pedestrian entrance, pool, and now demolished Trader Vic's restaurant, would result in a significant and unavoidable impact to historic resources, even with the inclusion of mitigation (City of Beverly Hills 2008a). Between 2016 and 2017, the eastern wing of the Wilshire Edge and former Trader Vic's buildings was demolished consistent with the Beverly Hilton Specific Plan. The Beverly Hilton Specific Plan 2008 EIR concluded that impacts to potentially historic

streetlights and street signs would be reduced to a less than significant level with implementation of Mitigation Measures MM-CR-2 and MM-CR-3, which provided for the preservation of these features (City of Beverly Hills 2008a).

The 9900 Wilshire Specific Plan 2016 SEIR concluded four streetlights located on or adjacent to the project site may be eligible for listing as historic resources (City of Beverly Hill 2016). In addition, the Robinsons-May building, which was demolished in 2014, was identified as a historic resource in the original 9900 Wilshire Specific Plan 2008 EIR, the demolition of which was considered a significant and unavoidable impact (City of Beverly Hills 2008c).The original 9900 Wilshire Specific Plan 2008 EIR included Mitigation Measures MM-CR-1 and MM-CR-2 for Historic American Buildings Survey and video documentation of the Robinsons-May building and MM-CR-3 for the preservation of potentially historic streetlights (City of Beverly Hills 2008c). As the Robinsons-May building was demolished in accordance with the original 9900 Wilshire Specific Plan 2008 EIR and Mitigation Measure MM-CR-3 would reduce impacts to historic streetlights to a less than significant level, the 9900 Wilshire Specific Plan 2016 SEIR concluded that impacts related to historic resources would be less than significant (City of Beverly Hills 2016).

Conditions on-site and in the site vicinity have changed (e.g., increased development of nearby properties such as the Ten Thousand, an apartment complex located at 10000 Santa Monica Boulevard, west of the project site) and the proposed increased heights of residential towers on the project site could potentially alter the historic setting for previously identified historic resources on and in the vicinity of the project site. In addition, subsequent to certification of the Beverly Hilton Specific Plan 2008 EIR, the City adopted a new General Plan that includes new policies related to the preservation of historic resources. Therefore, this issue will be studied further in the SEIR. In addition, the SEIR will consider the mitigation measures included in the previous environmental documentation and incorporate and/or revise them as applicable based on new information and project features.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Previous environmental documentation concluded that no known archaeological resources or human remains exist on the project site or its vicinity but excavation of the project site could potentially disturb unknown archaeological resources and/or human remains, resulting in a potentially significant impact to such resources (City of Beverly Hills 2008a and 2016). The Beverly Hilton Specific Plan 2008 EIR incorporated Mitigation Measure MM-CR-4 to reduce potential impacts to archaeological resources to a less than significant level (City of Beverly Hills 2008a). The SEIR will consider the mitigation measures included in the previous environmental documentation and incorporate and/or revise them as applicable based on new information and project features. Therefore, this issue will be studied further in the SEIR.

NEW INFORMATION SHOWING POTENTIALLY NEW OR GREATER SIGNIFICANT EFFECTS THAN PREVIOUS EIR

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6 Energy

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	■	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☐	■

California is one of the lowest per capita energy users in the United States, ranked 48th in the nation, due to its energy efficiency programs and mild climate. In 2018, California consumed 681 million barrels of petroleum, 2,137 billion cubic feet of natural gas, and one million short tons of coal in 2018 (United States Energy Information Administration [EIA] 2020). The single largest end-use sector for energy consumption in California is transportation (39.8 percent), followed by industry (23.7 percent), commercial (18.9 percent), and residential (17.7 percent) (EIA 2020).

Most of California's electricity is generated in-state with approximately 30 percent imported from the Northwest and Southwest in 2018. In addition, approximately 30 percent of California's electricity supply comes from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass (California Energy Commission 2019). Adopted on September 10, 2018, Senate Bill (SB) 100 accelerates the State's Renewables Portfolio Standards Program by requiring electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

To reduce statewide vehicle emissions, California requires all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-state refineries. Gasoline is the most used transportation fuel in California with 15.6 billion gallons sold in 2018 and is used by light-duty cars, pickup trucks, and sport utility vehicles (California Department of Tax and Fee Administration 2019). Diesel is the second most used fuel in California with 4.2 billion gallons sold in 2015 and is used

primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles (California Energy Commission 2016).

In December 2017, the City of Beverly Hills joined the Clean Power Alliance (CPA), a Los Angeles and Ventura County community choice aggregation program. One of the goals of the CPA is to purchase cleaner and more renewable electricity for the same or lesser price than the existing utility, Southern California Edison (SCE). SCE has continued to manage the transmission and distribution of power purchased through the CPA through the existing power grid and power lines. Customers are able to choose between three tiers of CPA participation: 36 percent, 50 percent, or 100 percent. To make the selection easier for all Beverly Hills customers, the City Council selected the 50 percent tier as the community's default tier (City of Beverly Hills 2020b).

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

Previous environmental documentation determined buildout under the Existing Specific Plans would make a minimal contribution to statewide energy consumption and would not be expected to adversely affect energy supplies (City of Beverly Hills 2008a and 2016). Similar to buildout under the Existing Specific Plans, the proposed project would involve the use of energy during construction and operational phases.

Construction

Energy use during the construction phase would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. In addition, temporary grid power may also be provided to any temporary construction trailers or electric construction equipment.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, the project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Electrical power would be consumed to construct the project, and the demand, to the extent required, would be supplied from existing electrical infrastructure in the area. Overall, demolition and construction activities would require minimal electricity consumption and would not be expected to have any adverse impact on available electricity supplies or infrastructure. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, per applicable regulatory requirements, the project would comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of energy necessary to construct the project. Furthermore, in the interest of both environmental awareness and cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. Therefore, project construction would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

Operation

Long-term operation of the proposed project would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. Gas service would be provided by Southern California Gas Company (SoCal Gas). Electricity service for the proposed project would be provided by SCE and the CPA. As previously described, the City of Beverly Hills chose 50 percent CPA renewable energy product as the community's default CPA tier. Therefore, 50 percent of the proposed project's energy consumption would be provided by renewable sources.

The proposed project would include construction of a total of 340 residential units and up to 30 accessory spaces that could be used for various purposes (e.g., staff living quarters, rooms for offices, wine storage, or other ancillary storage). In addition, the proposed project would result in a net reduction of hotel rooms and retail/commercial square footage on the project site compared to the Existing Specific Plans; hotel rooms would be reduced by 56 rooms (9 percent) and commercial/retail uses would be reduced by 23,121 sf (40 percent) (City of Beverly Hills 2008a and 2016). Therefore, the proposed project would demand less energy than the Existing Specific Plans.

The proposed project would also be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. The Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. The Code provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels.

The proposed project would be required to comply with the most current version of the Title 24 standards, which have been updated since certification of previous environmental documentation. As discussed under *Project Description*, the proposed project would be designed to achieve a LEED Gold rating through environmentally-sensitive architecture and building systems.

In addition, the proposed project would be located in close proximity to existing commercial/retail, recreational, and institutional land uses, which would reduce trip distances and encourage the use of alternative modes of transportation such as bicycling and walking. These factors would minimize the potential of the project to result in the wasteful or unnecessary consumption of vehicle fuels.

Meeting Title 24 energy conservation requirements in combination with the project components described above would ensure that energy is not used in an inefficient, wasteful, or unnecessary manner.

In addition to complying with the abovementioned standards and requirements, and being designed to achieve a LEED Gold rating and WELL Certification, implementation of Mitigation Measures

MM-ENG-1 and MM-ENG-2 from the Beverly Hilton Specific Plan 2008 EIR, with minor modifications as shown below, would further reduce energy-related impacts (City of Beverly Hills 2008a).

MM-ENG-1 Prior to *issuance of building permits* ~~submittal of final plans~~, the applicant shall make necessary alterations to the generation or distribution system as required by SCE. The applicant shall then provide to the Beverly Hills Community Development Department a letter from SCE that states that electricity will be provided to the proposed project and that all applicable energy conservation features have been incorporated into the project design.

MM-ENG-2 Prior to *issuance of building permits* ~~submittal of final plans~~, the applicant shall complete a load survey in accordance with the Gas Company procedures and make any necessary alterations to the distribution system as required by the Gas Company. The applicant shall then provide to the Beverly Hills Community Development Department a letter from the Gas Company, which states that natural gas will be provided to the proposed project and that all applicable energy conservation features have been incorporated into the project design.

As a result, operation of the proposed project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant and further analysis of these issues is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

In February 2009, the City adopted the Beverly Hills Sustainable City Plan (2009), which includes the following goal related to energy consumption:

Goal: Encourage the use of energy in a clean and efficient manner and the use of renewable energy sources.

As discussed above, the proposed project would be required to comply with the most current version of the Title 24 standards, which have been updated since certification of previous environmental documentation. As discussed under *Project Description*, the proposed project would be designed to achieve a LEED Gold rating through environmentally-sensitive architecture and building systems, and would incorporate energy-efficient design features such as efficient HVAC and MEP systems, smart metering, and water-efficient landscaping. Therefore, the project would be consistent with the applicable Sustainable City Plan goal related to renewable energy and energy efficiency and would not conflict with or obstruct state or local plans for renewable energy and energy efficiency, so no impact would occur and further analysis of these issues is not warranted.

NO IMPACT

7 Geology and Soils

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	■	☐	☐
2. Strong seismic ground shaking?	☐	☐	■	☐	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	☐	■	☐
4. Landslides?	☐	☐	☐	☐	■
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	■	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of					

		Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
	the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	■	☐
d.	Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	■	☐
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☐	■
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	■	☐

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The Alquist-Priolo Earthquake Fault Zoning Map for the Beverly Hills Quadrangle was revised in January 2018 to include an extension of the Santa Monica Fault Zone (SMFZ) northeast into portions of the City. The project site is located approximately 60 feet north at its closest point to the

delineated Alquist-Priolo Special Study Zone for the SMFZ (City of Beverly Hills 2018; California Geological Survey [CGS] 2018). Other active faults in the project site vicinity include the Hollywood Fault (approximately 1.4 miles northeast), the Newport-Inglewood Fault Zone (approximately 3.1 miles southeast), the Raymond Fault (approximately 10.3 miles northeast), and the Verdugo Fault (approximately 10 .5 miles northeast). The San Andreas Fault Zone is located approximately 36 miles northeast of the project site (Geocon West, Inc. [Geocon] 2016). The closest potentially active faults to the project site are the Overland Fault (approximately 2.5 miles south), the Charnock Fault (approximately 3.9 miles south), the MacArthur Park Fault (approximately 6 miles east), and the Coyote Hills Fault (approximately 12 miles east) (Geocon 2016). Therefore, the proposed project would not construct habitable structures within 50 feet of a designated fault zone.

The project site is located adjacent to the delineated earthquake fault zone boundary, but lies northwest of the zone of required investigation (California Geological Survey 2018). Nonetheless, in response to comments provided during the Notice of Preparation scoping period and due to the recent discovery of the extension of the Santa Monica fault along the southern boundary of the project site, the project may result in exposure of people or structures to potential substantial adverse effects associated with strong seismic ground shaking. Therefore, this issue will be studied further in an SEIR.

NEW INFORMATION SHOWING POTENTIALLY NEW OR GREATER SIGNIFICANT EFFECTS THAN PREVIOUS EIR

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The project site is located approximately 60 feet north at its closest point to the delineated Alquist-Priolo Special Study Zone for the SMFZ (City of Beverly Hills 2018; California Geological Survey [CGS] 2018). As a result, the site is expected to experience moderate to severe ground shaking from both near and distant earthquake sources during the life of the proposed structures. Moderate to severe ground shaking would be experienced on the project site if a large magnitude earthquake occurs on one of the nearby faults and may cause structural damage to the on-site development. Based on the observable effects from several more recent seismic events, including the Northridge (1994), San Fernando Earthquake (1971), Loma Prieta Earthquake (1989), and Alaska Earthquake (1964), under-designed building foundations may fail, potentially resulting in excessive building settlement or collapse; underground tanks or buried utilities may be prone to uplift or failure; and access roadways may become blocked or impassable, preventing emergency vehicles from accessing the sites. In addition, broken utility lines could result in fires, inhibit or contaminate water supplies, and cut off services to the residences and structures.

The Beverly Hilton Specific Plan 2008 EIR concluded site-specific geologic and soils conditions may be encountered during project construction that are not addressed by the California Building Code or City building standards and that would expose people to potentially significant impacts related to ground shaking (City of Beverly Hills 2008b). The Beverly Hilton Specific Plan 2008 EIR included Mitigation Measure MM-GEO-1 to reduce impacts related to seismic ground shaking to a less than significant level. The proposed project is located on the same site as the Existing Specific Plans, but also includes the gas station site. Due to the recent discovery of the extension of the Santa Monica fault along the southern boundary of the project site, the proposed project may result in exposure of people or structures to potential substantial adverse effects associated with strong seismic ground shaking. Therefore, this issue will be studied further in an SEIR.

NEW INFORMATION SHOWING POTENTIALLY NEW OR GREATER SIGNIFICANT EFFECTS THAN PREVIOUS EIR

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Previous environmental documentation concluded that the project site is not within a designated Liquefaction Hazard Zone and the updated CGS earthquake hazard map confirms that the project site is not subject to liquefaction (City of Beverly Hills 2008a and 2016; CGS 2018). In addition, density and laboratory testing of the subsurface materials at the site indicates the liquefaction potential on the project site is low. Therefore, previous environmental documentation determined the potential for seismic-related ground failure would be less than significant under the Existing Specific Plans (City of Beverly Hills 2008a and 2016). The project does not include any proposed changes or new information that would result in new or substantially more severe significant impacts identified in previous environmental documentation. Accordingly, impacts associated with liquefaction under the proposed project would be less than significant. Further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Previous environmental documentation concluded the Existing Specific Plans would not result in impacts involving landslides (City of Beverly Hills 2008a and 2016). The topography of the project site and its immediate vicinity are relatively flat and devoid of any distinctive landforms. According to CGS, the project site is not susceptible to seismically induced landslides (CGS 2018). Given the relatively flat nature of the project site and its vicinity, no potential for landslides exists, and the proposed project would not result in impacts related to landslides. Further analysis of this issue is not warranted.

NO IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

Previous environmental documentation concluded implementation of a Storm Water Pollution Prevention Plan (SWPPP) and the use of best management practices during project demolition and construction would result in less than significant impacts involving loss of topsoil (City of Beverly Hills 2008a and 2016). Demolition and construction activities for the proposed project would be similar to those analyzed for the Existing Specific Plans, and the proposed project would be subject to current regulations regarding control of stormwater runoff and erosion control. The project does not include any proposed changes or new information that would result in any new significant impacts beyond those identified in the previous environmental documentation. Further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Previous environmental documentation determined that while the project site is not located within a designated Liquefaction Hazard Zone, due to the shallow depth of groundwater and required excavation activities, there is the potential for the project site to be underlain by a geologic unit or soil that is unstable or could become unstable as a result of construction-related activities (City of Beverly Hills 2008a and 2016). Previous environmental documentation determined this impact to be potentially significant but was reduced to a less than significant level with the implementation of Mitigation Measure MM-GEO-1 (see above) (City of Beverly Hills 2008a and 2016). Therefore, potential project impacts from unstable geologic units or soil would also be reduced to a less than significant level by implementation of Mitigation Measure MM-GEO-1 under the proposed project. Given that Mitigation Measure MM-GEO-1 would apply and the project does not include any proposed changes or new information that would result in any new impacts related to unstable geologic units or soil or increase the severity of impacts identified in previous environmental documentation, impacts would continue to be less than significant with mitigation. Further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

d. Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

According to previous environmental documentation, upper soils on the project site have medium expansive potential (City of Beverly Hills 2008a and 2016). Excavation under the Existing Specific Plans reached a depth of approximately 42 feet below grade; the proposed project would include similar excavation that would reach up to 48 feet below grade. Additionally, based on the fluctuation of the depth of groundwater to up to 28 feet below grade, the likelihood of expansive soils impacting structures on the project site in the future was found to be probable. Previous environmental documentation found impacts related to expansive soils would be reduced to less than significant levels with the implementation of Mitigation Measure MM-GEO-1 (see above), which requires the implementation of all recommendations contained in the Geotechnical Investigation for the project and compliance with applicable local, state, and federal regulations (City of Beverly Hills 2008a and 2016). Likewise, previous environmental documentation determined that impacts would be less than significant with conformance with recommendations made in the geotechnical reports for the project, as well as all applicable local, state, and federal regulations, such as the Uniform Building Code. Therefore, potential impacts related to expansive soils for the proposed project would also be reduced to a less than significant level with implementation of Mitigation Measure MM-GEO-1. Given that Mitigation Measure MM-GEO-1 would apply and the project does not include any proposed changes or new information that would result in any new impacts related to expansive soils or increase the severity of impacts identified in previous environmental documentation impacts would continue to be less than significant with mitigation. Further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

As stated in previous environmental documentation, the Existing Specific Plans would connect to the City's existing sewer lines that serve the project site and would not use septic tanks or alternative wastewater disposal systems (City of Beverly Hills 2008a and 2016). Likewise, the proposed project would connect to the existing sewer system and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact related to the use of septic tanks or alternative wastewater disposal systems would occur and further analysis of this issue is not warranted.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Previous environmental documentation determined no known paleontological resources have been discovered on the project site or its vicinity, including the property at 9988 Wilshire Boulevard, but excavation would have the potential to disturb unknown paleontological resources, resulting in a potentially significant but mitigable impact to such resources (City of Beverly Hills 2008a and 2016). The proposed project would include excavation up to 48 feet below ground surface. In comparison, the maximum depth of excavation under the Existing Specific Plans would be up to 42 feet below ground surface. Nonetheless, the increase in maximum excavation depth associated with the Existing Specific Plans (42 feet) to the proposed project (48 feet) would not increase the potential severity of the significance of impacts to unknown paleontological resources. Previous environmental documentation incorporated mitigation measure MM-CR-6, which would also apply to the proposed project, to reduce impacts to paleontological resources to a less than significant level (City of Beverly Hills 2008a and 2016).

Therefore, impacts to paleontological resources under the proposed project would be less than significant and further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

8 Greenhouse Gas Emissions

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	■	□	□	□	□
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	■	□	□	□	□

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Beverly Hilton Specific Plan 2008 EIR does not analyze greenhouse gas (GHG) emission impacts related to the Beverly Hilton Specific Plan because that was not an environmental issue under CEQA at that time. More recently, the 9900 Wilshire Specific Plan 2016 SEIR found the 9900 Wilshire Specific Plan would not exceed the SCAQMD-recommended GHG emissions threshold of 3,000 metric tons of carbon dioxide equivalent (MT CO_2e) or conflict with any adopted plans and policies for the purpose of reducing GHG emissions (City of Beverly Hills 2016). In addition, as described in Section 6, *Energy*, the City of Beverly Hills joined the Clean Power Alliance (CPA) in 2017 and selected 50 percent renewable energy product as the community's default CPA tier. Therefore, 50 percent of the proposed project's energy consumption would be provided by renewable sources. The CPA also intends to develop renewable energy programs that would decrease GHG emissions to reduce the effects of climate change, such as incentives and rebates for rooftop solar and battery storage systems, energy efficiency projects, and reduced charging rates for electrical vehicles (City of Beverly Hills 2020b).

However, the proposed project has the potential to generate GHG emissions that may have a significant impact on the environment. In addition, the GHG emissions threshold utilized in the 9900 Wilshire Specific Plan 2016 SEIR was only intended for projects that would be built out by the year 2020 (SCAQMD 2008). The proposed project would be subject to and may potentially conflict with

various plans and policies adopted for the purpose of reducing GHG emissions, including the City's Sustainable City Plan (City of Beverly Hills 2009) and the Southern California Association of Governments' (SCAG) Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]) (SCAG 2020a). These issues will be studied in the SEIR.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

9 Hazards and Hazardous Materials

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	■	☐	☐	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	■	☐	☐	☐	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	■	☐

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☐	■
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	■	☐

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

Previous environmental documentation determined construction and operation of residential, hotel, and other commercial uses would not require extensive or ongoing use of materials expected to constitute a significant hazard to the public (City of Beverly Hills 2008a and 2016). The occasional use or disposal of hazardous materials generally associated with these types of uses include unused paint, aerosol cans, cleaning agents (solvents), automotive supplies (by-products), landscaping-related chemicals, and other common cleaning products and household substances. These materials are generally disposed of at non-hazardous Class II and III landfills (along with traditional solid waste). With compliance with the required procedures and guidelines during construction and throughout operation, impacts associated with the land uses planned under the proposed project on the environment related to the routine transport, use, or disposal of hazardous materials would

be less than significant (City of Beverly Hills 2008a and 2016). The project does not include any proposed changes or new information that would result in new or substantially more severe significant impacts identified in previous environmental documentation. Accordingly, impacts would be less than significant under the proposed project and further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Previous environmental documentation determined the Beverly Hilton Specific Plan would potentially result in the exposure of the public to hazardous materials as a result of the demolition of the existing on-site structures (City of Beverly Hills 2008a). Some Beverly Hilton structures were demolished in July 2014. As part of that demolition, asbestos and lead-based paints were removed from the site in accordance with the Beverly Hills Municipal Code Section 10-3-4201. Likewise, the Robinsons-May Building formerly located on 9900 Wilshire Boulevard was demolished in 2014 in accordance with Beverly Hills Municipal Code Section 10-3-4201 and this portion of the project site is now entirely vacant and graded. As the 9900 Wilshire portion of the project site has remained undeveloped since the demolition of the Robinsons-May building in 2014, the 9900 Wilshire Specific Plan 2016 SEIR did not include mitigation related to hazardous materials and this impact area was found to be less than significant (City of Beverly Hills 2016).

The proposed project would involve demolition of the existing Beverly Hilton Conference Center, Beverly Hilton Oasis Building, and aboveground parking structure. Due to the ages of these structures, they could potentially contain asbestos, mold, polychlorinated biphenyls (PCBs), and/or lead-based paints. The proposed project would comply with the Mitigation Measures MM-HAZ-1 through MM-HAZ-3 from the Beverly Hilton Specific Plan 2008 EIR to minimize risks of hazardous materials release associated with project demolition/construction (City of Beverly Hills 2008a).

In addition, mitigation measures discussed under Response (c) below would also apply to demolition and construction activities associated with the proposed project.

According to previous environmental documentation, operation of the proposed project would not involve uses that generate large quantities of hazards and/or toxic materials, and thus, would not result in accidents from hazardous materials or substances (City of Beverly Hills 2008a and 2016). Operational impacts would be less than significant. However, there are three underground storage tanks (USTs) underneath the gas station at 9988 Wilshire Boulevard, all of which held gasoline but have been empty since the closure of the gas station in 2019. However, the gas station site has a pending application for a Conditional Use Permit and could potentially enter into operation in the future. The gas station would be demolished as part of the proposed project. As such, the proposed project may create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, these issues will be studied further in the SEIR. In addition, the SEIR will consider the mitigation measures included in the previous environmental documentation and incorporate and/or revise them as applicable based on new information and project features.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

As stated in previous environmental documentation, El Rodeo School is located north of the project site, across Wilshire Boulevard, within 0.25 mile of the project site (City of Beverly Hills 2008a and 2016). As of August 2020, El Rodeo School is closed for construction, and is not expected to re-open until the 2021-2022 school year, at the earliest. Previous environmental documentation concluded operation of land uses planned under the proposed project would not release hazardous materials or substances into the environment and impacts during operation would be less than significant (City of Beverly Hills 2008a and 2016). Construction activities associated with the proposed project could potentially result in temporary upset and/or accident conditions involving the accidental release of hazardous materials into the environment within 0.25 mile of El Rodeo School. The Beverly Hilton Specific Plan 2008 EIR included the Mitigation Measures MM-HAZ-4 through MM-HAZ-7, which would also apply to the proposed project, to reduce construction impacts associated with hazardous materials, substances, or waste near schools to less than significant levels (City of Beverly Hills 2008a).

There are three underground storage tanks (USTs) underneath the gas station at 9988 Wilshire Boulevard, all of which held gasoline but have been empty since the closure of the gas station in 2019. However, the gas station site has a pending application for a Conditional Use Permit and could potentially enter into operation in the future. The gas station would be demolished as part of the proposed project; therefore, the proposed project has the potential to emit hazardous emissions within 0.25 mile of an existing school. Therefore, these issues will be studied further in the SEIR. In addition, the SEIR will consider the mitigation measures included in the previous environmental documentation and incorporate and/or revise them as applicable based on new information and project features.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Previous environmental documentation concluded the portions of the project site covered by the Existing Specific Plans are not listed on any federal or state databases of hazardous material sites (City of Beverly Hills 2008a and 2016). The gas station site located at 9988 Wilshire Boulevard is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, there are three USTs underneath the gas station at 9988 Wilshire Boulevard, all of which held gasoline but are currently empty. According to the California Department of Toxic Substances Control (DTSC) EnviroStor database and State Water Resources Control Board (SWRCB) GeoTracker database, there is no history of leaks or contamination associated with the existing USTs (DTSC 2020; SWRCB 2020).

Previous environmental documentation also indicated other listed hazardous material sites occur more than 800 feet from the project site or down-gradient of the site, and therefore, pose a low potential for environmental impacts to the project site (City of Beverly Hills 2008a and 2016). Accordingly, previous environmental documentation concluded that the Existing Specific Plans would not create a significant hazard to the public or environment (City of Beverly Hills 2008a and 2016). The project does not include any proposed changes or new information that would result in new or substantially more severe significant impacts identified in previous environmental

documentation. Accordingly, the development of the proposed project would result in less than significant impacts and risks to the public and the environment (City of Beverly Hills 2008a and 2016). Further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

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

As determined in previous environmental documentation, the project site is not located within an airport land use plan or within two miles of a public airport and would not result in safety hazards for area residents (City of Beverly Hills 2008a and 2016). Therefore, no impact would occur under the proposed project, and further analysis of this issue is not warranted.

NO IMPACT

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Previous environmental documentation determined redevelopment of the project site would not encroach into roadways or evacuation pathways, subsequently interfering with any adopted emergency response plan or emergency evacuation plan (City of Beverly Hills 2008a and 2016). The westernmost portion of the project site would be accessed from Santa Monica Boulevard and Wilshire Boulevard via a private drive along the western edge of the site. The proposed project would also add an exit-only driveway for the proposed hotel building to Wilshire Boulevard. Beverly Hilton access would continue to be from Merv Griffin Way, and the entire project site would have loading access on Santa Monica Boulevard North where it is currently provided for the Beverly Hilton.

The proposed project, similar to the Existing Specific Plans, would be required to comply with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments, as well as fire protection and security. As further discussed in Section 15, *Public Services*, previous environmental documentation included mitigation measure MM-FIRE-1, which would apply to the proposed project and would reduce potential impacts to the movements of fire and police vehicles caused by traffic at the intersection of Merv Griffin Way and Santa Monica Boulevard (City of Beverly Hills 2008a and 2016). Likewise, the proposed project would include Mitigation Measure MM-FIRE-1 to reduce potential impacts to emergency vehicle movements. Furthermore, the Beverly Hills Fire Marshal confirmed the project, while incrementally increasing the demands on BHFD, such an increase would not require new fire protection facilities or additional personnel (Hand, pers. comm. 2020). Therefore, it is anticipated that BHFD would be able to provide adequate fire protection and rescue services to serve the proposed project. As a result, the proposed project would not conflict with applicable emergency response and evacuation plans, and impacts would be less than significant. Further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

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

The project site is located in an urbanized area that includes commercial, office, residential, and recreational uses and roadways. According to the California Department of Forestry and Fire Protection (CalFIRE), the project site is not located within a very high fire hazard severity zone (VHFHSZ) (CalFIRE 2011). As described in previous environmental documentation, no dense, flammable brush, grass, or trees exist on the project site (City of Beverly Hills 2008a and 2016).

The proposed project would include an eight-acre botanical garden, which could potentially present a fire risk on the project site. However, the botanical garden would be designed to reduce risks of fire by minimizing the planting of highly flammable tree species such as pine and juniper, maintaining the recommended minimum distance of 30 feet between trees and structures, and implementing a Fuel Management Plan for the removal of fuels to reduce the likelihood of fire (City of Beverly Hills 2019 and 2020). Furthermore, prior to final plan approvals, the proposed project, similar to the Existing Specific Plans, would be required by the City to comply with applicable codes, regulations, and standard measures for fire protection. For example, prior to approval of the proposed project, plot plans that show the site access points shall be submitted to BHFD for review and approval. The developer would be required to provide proof of compliance with applicable building and fire code requirements. These requirements include, but are not limited to, items such as types of roofing materials, building construction, fire hydrant flows, hydrant spacing, access and design, fire sprinkler systems, and other hazard reduction programs, as set forth by BHFD and the Uniform Fire Code. Therefore, the project would not result in any additional significant impacts or increase the severity of any impacts identified in previous environmental documentation and potential impacts to people and structures as a result of wildland fires would be less than significant, and further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

10 Hydrology and Water Quality

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	■	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	■	☐
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☐	■	☐

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☐	■	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	■	☐
(iv) Impede or redirect flood flows?	☐	☐	☐	■	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☐	■
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	■	☐

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Previous environmental documentation concluded redevelopment of the project site would require compliance with a National Pollutant Discharge Elimination System (NPDES) Permit for demolition- and construction-related water quality impacts. Construction and operation of the underground parking garage would also necessitate dewatering activities that would discharge treated water to the City storm drain system. Previous environmental documentation include Mitigation Measure MM-HYDRO-1, which would also apply to the proposed project, to reduce this impact (City of Beverly Hills 2008a and 2016).

Previous environmental documentation also concluded water quality may be impacted by parking lot/garage-generated pollutants, as well as runoff from landscaped areas. Mitigation Measure MM-HYDRO-2 included in previous environmental documentation would reduce water quality impacts from the parking areas/garage and landscaped areas and would also apply to the proposed project (City of Beverly Hills 2008a and 2016).

The project does not include any proposed changes and there is no new information that would result in any new significant water quality impacts or increase the severity of significant impacts related to water quality beyond those identified in previous environmental documentation. Given the mitigation measures included in previous environmental documentation would also apply to the proposed project, water quality impacts would be less than significant, and further analysis of these issues is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

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

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The proposed project would include excavation up to 48 feet below ground surface, with the average excavation depth of 31 feet below ground surface. In comparison, the maximum depth of excavation under the Existing Specific Plans would be up to 42 feet below ground surface. Previous environmental documentation concluded redevelopment of the project site would result in a less than significant impact on groundwater supplies based on required dewatering and location of the project site to the nearest City well. Groundwater at the project site was encountered at depths of 30 to 45 feet below ground surface. There are certain techniques, including temporary dewatering wells, storage tanks, and filters, that may be used to dewater the site. Dewatering would not deplete groundwater supplies because the distance between the project site and the nearest City well is down-gradient and because potential site dewatering would be conducted only when shallow groundwater conditions are encountered (City of Beverly Hills 2008a and 2016). The proposed project would also be required to comply with all aspects of the City's dewatering ordinance and to obtain an NPDES Permit for Groundwater Discharge from the Los Angeles Regional Water Quality Control Board (LARWQCB). Accordingly, potential impacts to groundwater associated with the proposed project would be consistent with those previously analyzed and would be less than significant.

Previous environmental documentation also concluded redevelopment of the project site would result in less than significant impacts on groundwater supplies based on the project location, available groundwater supplies, and proposed new pervious surface area (City of Beverly Hills 2008a and 2016). The project site is underlain by the Santa Monica Sub-basin, and approximately 10 percent of the City's water supply comes from the nearby Hollywood Sub-basin groundwater sources (City of Beverly Hills 2017). Groundwater consumed by the proposed land uses would be utilized according to current plans and projections from the Hollywood Sub-basin; therefore, the proposed project's impacts to groundwater supplies consistent with those previously analyzed and would be less than significant.

Furthermore, as discussed under Response (a) of this section, compliance with existing regulations would ensure the proposed project would not degrade surface or groundwater quality. Consequently, the project would not conflict with or obstruct implementation of a water quality control plan. Refer to Section 19, *Utilities and Service Systems*, of this Initial Study regarding the proposed project's potential impacts related to increased demand for water under the current drought conditions. Further analysis of groundwater is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Previous environmental documentation determined redevelopment facilitated by the Existing Specific Plans would not alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion, siltation, or flooding on-site or off-site (City of Beverly Hills 2008a and 2016). The project site also does not contain a stream or a river, nor is the site located in proximity to a stream or a river. Approximately 54 percent of the project site is developed with existing structures and impervious surfaces, while 46 percent of the project site is graded and undeveloped. The entire project site is served by an existing stormwater collection and conveyance system. Previous environmental documentation stated redevelopment of the project site would increase the amount of pervious surfaces compared to existing conditions and potential drainage impacts would be less than significant (City of Beverly Hills 2008a and 2016).

The proposed project would not be located near any streams or rivers. The proposed project would allow for increased building heights to reduce impervious surfaces on the project site and allow for the creation of 10 acres of open space, including an eight-acre botanical garden. In comparison, the Existing Specific Plans would only provide for approximately 6.3 acres of landscaped area (City of Beverly Hills 2008a and 2016). Additionally, stringent municipal separate storm sewer system (MS4) requirements would apply to the proposed project, including Order No. R4-2012-0175 from the LARWQCB, which ensures discharges from the MS4 comply with water quality standards, including protecting the beneficial uses of receiving waters. The Order requires permittees, including the City of Beverly Hills, to implement specific Best Management Practices. The MS4 requirements, as well as the other permitting requirements, would ensure the proposed project would not result in any

new significant impacts related to drainage patterns or increase the severity of significant impacts related to drainage patterns beyond those identified in previous environmental documentation. Therefore, further analysis of these issues is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The project site is not located in the vicinity of any streams or rivers, and therefore, the proposed project would not alter the course of any streams or rivers. The project site is served by the existing Beverly Hills stormwater collection and conveyance system. The proposed project would include 10 acres of open space, which would facilitate stormwater collection and delivery to the existing stormwater system and would not increase flows on the project site above the Existing Specific Plans. Furthermore, to discharge the subdrain water proposed as part of the underground parking structure, the project applicant would be required to comply with the City's dewatering ordinance and the NPDES Permit for Groundwater Discharge from the LARWQCB. Therefore, redevelopment under the proposed project would result in a less than significant impact. Further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

As discussed under Responses (c.[i]), (c.[ii]), and (c[iii]) above, the project site is not located in the vicinity of any streams or rivers, and therefore, the proposed project would not alter the course of any streams or rivers. The project site is served by the existing Beverly Hills stormwater collection and conveyance system. Redevelopment of the project site under the proposed project would increase the area of pervious surfaces on the project site beyond that planned under the Existing Specific Plans and would not impede or redirect stormwater flows (City of Beverly Hills 2008a and 2016). The proposed project would increase pervious surfaces on the project site compared to the Existing Specific Plans by creating additional open space and would therefore not increase stormwater flows or impede or redirect flood flows. Redevelopment under the proposed project would result in a less than significant impact. Further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

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

The Flood Insurance Rate Map for the project site and its vicinity was last updated in September 2008. According to the 2008 Flood Insurance Rate Map, the project site is located in Zone X, indicating that the project site is in an area of minimal flood hazard (Federal Emergency Management Agency [FEMA] 2008). Previous environmental documentation determined no impacts due to flooding would occur due to redevelopment of the project site, as the site is not located within a 100- or 500-year flood zone as mapped by FEMA or near enough to the Pacific Ocean or a large body of water capable of producing a seiche (City of Beverly Hills 2008a and 2016). Therefore, the proposed project would not result in impacts associated with flood hazards, tsunamis, or seiches. Further analysis of this issue is not warranted.

NO IMPACT

11 Land Use and Planning

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Physically divide an established community?	☐	☐	☐	■	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	■	☐	☐	☐	☐

a. Would the project physically divide an established community?

The project site is developed and located within an urban setting. Land uses in the vicinity of the project site include Wilshire Boulevard, Beverly Gardens Park, a single-family residential neighborhood, and El Rodeo School to the north; Santa Monica Boulevard, South Santa Monica Boulevard, and retail and office uses to the south and east; and the Los Angeles County Club's golf course to the west. The City's "Business Triangle," its main business district, lies northeast of the intersection of Wilshire Boulevard and Santa Monica Boulevard. The project site is presently zoned C-3 Commercial, 9900 Wilshire Specific Plan, and Beverly Hilton Specific Plan; the Existing Specific Plans allow for a mix of residential and commercial uses on the project site.

The project site is located near the western City limit, beyond which the Los Angeles Country Club's golf course and the community of Century City in the City of Los Angeles are located. Century City, just southwest of the project site, is characterized by a concentration of high-rise residential towers along the Santa Monica Boulevard corridor and residential and office towers farther west and south. Low-rise retail buildings and mid-rise office buildings and medical facilities characterize the Business Triangle northeast of the project site. The scale, mass, and height of the proposed project, similar to the Existing Specific Plans, are generally consistent with existing developments in Century City to the west.

The existing Merv Griffin Way, a private roadway that runs through the project site, provides a connection between Wilshire Boulevard and Santa Monica Boulevard. This roadway would be regraded and moved west as well as covered with a portion of the new landscaped area. The Merv Griffin roadway would remain open and accessible following implementation of the proposed

project and continue to provide access between these two major thoroughfares. In addition, the proposed project would include publicly accessible pedestrian walking paths throughout the project site.

According to previous environmental documentation, the Existing Specific Plans would involve changes to the layout of uses on the project site but would not include any components that would divide or disrupt the arrangement of the established community (City of Beverly Hills 2008a and 2016). Likewise, the proposed project would not include any components that would divide or disrupt the arrangement of the established community. Therefore, related land use impacts would be less than significant and further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

With the adoption of the Existing Specific Plans, the project site's zoning and land use designations were changed to "9900 Wilshire Specific Plan" and "Beverly Hilton Specific Plan." The Existing Specific Plans were determined to be generally consistent with most of the goals, objectives, and policies of the City's General Plan and the Beverly Hills Municipal Code (City of Beverly Hills 2008a and 2016). However, the existing Beverly Hilton Specific Plan introduced residential land uses where none had existed, substantially increased development density, and substantially increased building heights on the project site. For these reasons, the existing Beverly Hilton Specific Plan was found to be inconsistent with General Plan Land Use Element Objective 3, *Areas of Transitional Conflict*, and Objective 4, *Scale of the City*, and with Land Use Element development criteria for Commercial Areas recommending compatibility between commercial and residential areas. Accordingly, previous environmental documentation concluded a potentially significant impact could occur and feasible mitigation measures to reduce impacts to a less than significant level are not available (City of Beverly Hills 2008a).

Previous environmental documentation also found the existing 9900 Wilshire Specific Plan would add a hotel use to the site where none had existed, but that with adherence to existing regulations and implementation of mitigation measures identified in other sections of the 9900 Wilshire Specific Plan 2016 SEIR (Mitigation Measures NOISE-1 through NOISE-3 and TRAF-1 through TRAF-8), the existing 9900 Wilshire Specific Plan would not conflict with any land use plan, policy, or regulation and impacts would be less than significant (City of Beverly Hills 2016).

The proposed project would include land uses described in the Existing Specific Plans but would allow for increased building heights and would add a new parcel to the project site located at 9988 Wilshire Boulevard to accommodate 10 acres of open space on the project site, including a publicly accessible botanical garden and sculpture garden. The proposed project would include changes to the Existing Specific Plans by altering the heights of the proposed new buildings and could potentially conflict with City plans and policies. In addition, subsequent to certification of the Beverly Hilton Specific Plan 2008 EIR, the City adopted a new General Plan with new policies and programs to which the proposed project would be subject. Therefore, land use and planning impacts under the proposed project could be potentially significant, and this issue will be studied further in the SEIR.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

12 Mineral Resources

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☐	■

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

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The project site is developed and located within an urban setting. As concluded in previous environmental documentation, no mineral resources of value to the region or the residents of the state are known to be within the project area other than petroleum, and the redevelopment of the project site would not conflict with any policies that would affect the petroleum resources located in the vicinity (City of Beverly Hills 2008a and 2016). Therefore, the proposed project would not result in impacts to mineral resources and further analysis of this issue is not warranted.

NO IMPACT

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13 Noise

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project result in:					
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	■	□	□	□	□
b. Generation of excessive groundborne vibration or groundborne noise levels?	■	□	□	□	□
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	□	□	□	□	■

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Previous environmental documentation determined that construction noise impacts associated with redevelopment of the project site would be significant and unavoidable (City of Beverly Hills 2008a and 2016). Construction activities performed Monday through Friday between the hours of 8:00 a.m. and 6:00 p.m. would result in less than significant noise impacts; however, exterior construction activities performed outside of the hours specified in the City's noise ordinance, including before 8:00 a.m., after 6:00 p.m., and during weekends and holidays, would result in significant impacts at off-site sensitive receptors. The Beverly Hilton Specific Plan 2008 EIR and 9900 Wilshire Specific Plan 2016 SEIR included Mitigation Measures MM-NOISE-1 and MM-NOISE-1 and MM-NOISE-4, respectively, to reduce construction-related noise impacts (City of Beverly Hills 2008a and 2016).

The Beverly Hilton Specific Plan 2008 EIR determined that while implementation of Mitigation Measure MM-NOISE-1 would reduce construction-related noise impacts, such impacts would remain significant and unavoidable (City of Beverly Hills 2008a). Conversely, the 9900 Wilshire Specific Plan 2016 SEIR found that with implementation of Mitigation Measure MM-NOISE-1, construction noise impacts of the 9900 Wilshire Specific Plan would be reduced to a less than significant level (City of Beverly Hills 2016).

Previous environmental documentation also found that operational noise impacts associated with mechanical systems and traffic generated by redevelopment of the project site would be less than significant (City of Beverly Hills 2008a and 2016). However, previous environmental documentation concluded traffic noise on Santa Monica Boulevard, Wilshire Boulevard, and Merv Griffin Way in the future “with project” condition would approach or exceed the multi-family residential exterior noise standard of 65 dBA and the residential interior noise threshold of 45 dBA CNEL. Previous environmental documentation determined that such impacts would be reduced to a less than significant level with implementation of Mitigation Measures MM-NOISE-2 and MM-NOISE-3 of the Beverly Hilton Specific Plan 2008 EIR and 9900 Wilshire Specific Plan 2016 SEIR, which provided for the inclusion of sound attenuating building materials and techniques (City of Beverly Hills 2008a and 2016).

The construction timing of the proposed project would be similar to that under the Existing Specific Plans (i.e., potentially working before 8:00 a.m., after 6:00 p.m., and during weekends and holidays). However, changes in the locations of structures and overall construction schedule under the proposed project could alter construction and operational noise impacts. In addition, the City recently adopted a new General Plan Noise Element and associated noise policies, as well as revised noise regulations in the City’s Municipal Code, subsequent to certification of the Beverly Hilton Specific Plan 2008 EIR. Therefore, construction-related noise impacts will be studied further in the SEIR. In addition, the SEIR will consider construction noise mitigation measures included in the previous environmental documentation and incorporate and/or revise them as applicable based on new information and project features.

Furthermore, while previous environmental documentation concluded Mitigation Measures MM-NOISE-2 and MM-NOISE-3 would reduce impacts to residential exterior and interior noise to a less than significant level under the Existing Specific Plans, the proposed project would involve construction of residential units in a different configuration which may be subject to different noise levels from nearby roadways. As a result, such impacts may be greater under the proposed project. Although the proposed project would be similar to the Existing Specific Plans, noise impacts that were determined to be less than significant or less than significant with mitigation incorporated under the Existing Specific Plans could potentially be significant under the proposed project based on changed noise conditions in the site vicinity, changes in trip generation, and new General Plan

Noise Element policies and revised noise regulations in the City's Municipal Code. Therefore, these issues will be studied further in the SEIR. In addition, the SEIR will consider the mitigation measures included in the previous environmental documentation and incorporate and/or revise them as applicable based on new information and project features.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

According to previous environmental documentation, construction activity associated with the Existing Specific Plans would generate vibration levels of up to 75 velocity decibels (VdB) at 100 feet from the source (City of Beverly Hills 2008a and 2016). This exceeds 72 VdB, the Federal Railroad Administration's vibration threshold for hotels. Accordingly, construction activity associated with redevelopment of the project site could result in significant vibration impacts on on-site existing and future receptors. Although implementation of Mitigation Measure MM-NOISE-1 would reduce the level of significance of the impact, construction-related vibration impacts would remain significant and unavoidable (City of Beverly Hills 2008a and 2016). The proposed project, while similar to the Existing Specific Plans, would involve construction of taller residential buildings in a different configuration. As a result, greater vibration-related impacts could occur under the proposed project. Accordingly, this issue will be studied further in the SEIR.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

As discussed in Section 9, *Hazards and Hazardous Materials*, the project site is not located within an airport land use plan or within the vicinity of a public airport; therefore, the proposed project would not expose people in the project area to excessive noise levels related to airport activity and no impact would occur. Further analysis of this issue is not warranted.

NO IMPACT

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14 Population and Housing

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	■	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☐	■

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Previous environmental documentation concluded increased housing and employment at the project site would result in less than significant impacts related to population growth (City of Beverly Hills 2008a and 2016). The proposed project would result in 340 residential units on the project site, which is 37 units more than the planned 303 residential units under the Existing Specific Plans, and up to 30 accessory spaces that could be used for various purposes (e.g., staff living quarters, rooms for offices, wine storage, or other ancillary storage). Assuming the 30 accessory spaces would be used for staff living quarters, the project would result in 67 more total residential units than the Existing Specific Plans. Based on the 2020 estimate of 2.30 persons per household (California Department of Finance [DOF] 2020) and conservatively assuming all 30 accessory spaces are used as staff living quarters at the same rate of 2.30 persons per household, the proposed project would generate an estimated 851 residents. SCAG forecasts the population of Beverly Hills will reach 35,800 by 2045, an increase of 2,025 residents from the City's estimated 2020 population (SCAG 2020b; DOF 2020). The proposed project's contribution to population growth projections would be approximately 42 percent of the population growth projected for 2045. The project would

incrementally increase residential units on the project site in comparison to the Existing Specific Plan. However, the proposed project would not result in an exceedance of anticipated population growth in Beverly Hills and thus, would not induce substantial unplanned population growth. Therefore, the project would result in a less than significant impact.

In addition, the proposed project would result in a net reduction of hotel rooms and retail/commercial square footage on the project site compared to the Existing Specific Plans; hotel rooms would be reduced by 56 (9 percent) and commercial/retail uses would be reduced by 23,121 sf (40 percent) (City of Beverly Hills 2008a and 2016). Therefore, employment growth generated at the project site under the proposed project would be reduced when compared to the Existing Specific Plans. Accordingly, the proposed project would not increase direct or indirect population growth compared to the Existing Specific Plans and further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Previous environmental documentation stated the Existing Specific Plans would result in no impact related to the displacement of housing or people (City of Beverly Hills 2008a and 2016). The project site is currently developed with hotels and associated facilities, as well as a gas station. No residences would be removed as part of the proposed project. Therefore, the proposed project would not displace existing housing or persons and no impact would occur. Further analysis of this issue is not warranted.

NO IMPACT

15 Public Services

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	■	☐	☐
1. Fire protection?	☐	☐	■	☐	☐
2. Police protection?	☐	☐	☐	■	☐
3. Schools?	☐	☐	☐	■	☐
4. Parks?	☐	☐	☐	■	☐
5. Other public facilities?	☐	☐	☐	■	☐

a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Fire protection, rescue services, and emergency medical (paramedic services) are provided by the Beverly Hills Fire Department (BHFD). Previous environmental documentation concluded adherence to City codes and requirements would reduce construction-related fire hazards associated with redevelopment of the project site to a less than significant level (City of Beverly Hills 2008a and 2016). In addition, as discussed in Section 9, *Hazards and Hazardous Materials*, and Section 20, *Wildfire*, the proposed botanical garden would be designed and managed in accordance with best practices for the reduction of fire risk on the project site. Furthermore, the project site is in an urbanized area of the city not close any wildland urban interfaces and is not located within a VHFHSZ as mapped by CalFIRE, indicating that the risk of fire at the project site is low (CalFIRE 2011).

However, previous environmental documentation stated the BHFD indicated the proposed traffic signal at the intersection of Merv Griffin Way and Santa Monica Boulevard could potentially slow emergency response times and inhibit access to the site. Previous environmental documentation included the following mitigation measure, which would also apply to the proposed project, to reduce impacts to less than significant levels (City of Beverly Hills 2008a and 2016):

MM-FIRE-1 The proposed signal at the intersection of Santa Monica Boulevard and Merv Griffin Way shall be outfitted with an Opticom device, a traffic signal pre-emption used to control signalized intersections to allow the BHFD to provide a safe response route and to decrease response times to emergencies.

Previous environmental documentation also concluded redevelopment of the project site would incrementally increase demands on BHFD, but such an increase would not require the construction of new fire protection facilities (City of Beverly Hills 2008a and 2016). Redevelopment of the project site would be required to comply with the California Health and Safety Code regulations for fire protection devices and high-rise building standards, which would further reduce the risk of fire at the project site (City of Beverly Hills 2008a and 2016). Furthermore, the Beverly Hills Fire Marshal confirmed the project, while incrementally increasing the demands on BHFD, such an increase would not require new fire protection facilities or additional personnel (Hand, pers. comm. 2020). Therefore, it is anticipated that BHFD would be able to provide adequate fire protection and rescue services to serve the proposed project. As a result, the proposed project would not increase demands on BHFD significantly beyond that determined for the Existing Specific Plans, and impacts would be less than significant.

Previous environmental documentation also stated the City Engineer had indicated that the fire flow of 1,000 to 1,500 gallons per minute (gpm) measured at hydrants serving the project site may not be adequate for redevelopment of the project site, and that such an impact could potentially be significant. Previous environmental documentation included Mitigation Measure MM-FIRE-2; however, that mitigation measure may be outdated. Therefore, this issue will be studied further in the SEIR. Given that the issue relates to water infrastructure, fire flow and hydrants, this issue will be studied in the "Utilities" section of the SEIR

NEW INFORMATION SHOWING POTENTIALLY NEW OR GREATER SIGNIFICANT EFFECTS THAN PREVIOUS EIR

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Police protection in the city is provided by the Beverly Hills Police Department (BHPD). As stated in previous environmental documentation, during construction on the project site, the use of private security, flagpersons, and other standard construction practices would result in less than significant impacts related to police protection (City of Beverly Hills 2008a and 2016). Additionally, during construction and operation of redevelopment on the project site, BHPD considered existing service to be adequate to continue serve the project site (City of Beverly Hills 2008a and 2016). Previous environmental documentation also concluded redevelopment of the project site would incrementally increase demands on BHPD but such an increase would not require expansion of existing resources (City of Beverly Hills 2008a and 2016). The proposed project, like the Existing Specific Plans, would include security features such as gated entry to the proposed residential buildings, 24-hour security, and 24-hour on-site concierge for residents. These security features would incrementally decrease the need for police protection services on the project site. Accordingly, the proposed project would not result in any new significant impacts to police protection services or increase the severity of impacts to police protection services beyond those identified in previous environmental documentation, and further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Based on a standard generation rate of 0.7 student per household, the proposed project would generate approximately 238 students. Assuming the 30 accessory spaces are used for staff housing, then the total number of students generated by the proposed project would be approximately 259. The 303 residential units contained within the Existing Specific Plans would generate an estimated 212 students. Therefore, the proposed project would incrementally increase the number of students at the project site by up to approximately 47. Although an increase in students could adversely affect schools, the proposed project, similar to the Existing Specific Plans, would be required to pay school impacts fees (City of Beverly Hills 2008a and 2016). Under Section 65996 of the California Government Code, the payment of such fees is deemed to fully reduce the impacts of new development on school facilities to less than significant levels. Therefore, the proposed project would not result in any new significant impacts to schools or increase the severity of impacts to schools beyond those identified in previous environmental documentation. Therefore, further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

According to the Open Space Element of the City's General Plan, the City owns and operates approximately 77 acres of developed parkland (City of Beverly Hills 2010). Based on the 2020 population estimate of 33,775 residents, the parkland-to-population ratio in the City is presently 2.3 acres of parkland per 1,000 residents (DOF 2020). Both the Existing Specific Plans and the proposed project would reduce this ratio to 2.2 acres per 1,000 residents. However, the proposed project would increase the amount of publicly accessible open space with the development of 4.5 acres of botanical gardens open to the public and 3.5 acres of open space reserved for project residents and guests of the hotel.

Previous environmental documentation concluded redevelopment of the project site would incrementally increase demands on existing public parks; however, demand would be lessened by the provisioning of on-site recreational amenities and new open space areas, including a fitness center and swimming pools (City of Beverly Hills 2008a and 2016). The proposed project would reduce the number of hotel rooms on the project site compared to the Existing Specific Plans and would therefore not be anticipated to create adverse impacts to parks above those analyzed in the previous environmental documentation. Furthermore, the proposed project, like the Existing Specific Plans, would be required to pay the City's Park and Recreation Facilities Construction Tax, pursuant to the Beverly Hills Municipal Code Section 3-1-702, which would reduce any impacts to a less than significant level (City of Beverly Hills 2016). Accordingly, the proposed project would not result in any new significant impacts to parks or increase the severity of impacts to parks beyond those identified in previous environmental documentation. Therefore, further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Previous environmental documentation concluded redevelopment of the project site would incrementally increase demand on existing library services due to the addition residential units at the project site, but would have less than significant impacts due to the availability of other libraries in proximity to the project site, the current adequacy of the City's main library branch, and the contributions of new residents to the tax base that funds library services (City of Beverly Hills 2008a and 2016). As discussed in Section 14, *Population and Housing,* the proposed project would construct 340 residential units and up to 30 accessory spaces that could be used for various purposes (e.g., staff living quarters, rooms for offices, wine storage, or other ancillary storage). Assuming the 30 accessory spaces would be used for staff living quarters, the project would result in 67 more total residential units than the Existing Specific Plans, an incremental increase of approximately 22 percent. Furthermore, the proposed project would reduce the number of hotel rooms on the project site compared to the Existing Specific Plans; therefore, it would not indirectly generate more demand on library services due to employees than that expected under the Existing

Specific Plans. Guests of the hotel would also not substantially increase demand on library services because their presence in Beverly Hills would be temporary. The proposed project would not substantially increase demand on public libraries when compared to the Existing Specific Plans. The proposed project would not result in any new significant impacts to library services or increase the severity of impacts to library services beyond those identified in previous environmental documentation, and further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

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16 Recreation

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	■	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	■	☐

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

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

According to the Open Space Element of the City's General Plan, the City owns and operates approximately 177 acres of public land for recreation, including approximately 77 acres of developed parkland and approximately 100 acres of open space area (City of Beverly Hills 2010). Based on a 2020 population of 33,775, the ratio of public land to residents in the City is approximately 5.2 acres of public recreation land for every 1,000 residents. Therefore, the ratio of public parks to residents in the City is greater than the standard ratio of three acres of parkland for every 1,000 residents used by the Quimby Act, which requires developers to help mitigate the impacts of property improvements by dedicating parkland and/or in lieu fees.

As stated in previous environmental documentation, redevelopment of the project site would result in less than significant impacts related to recreational facilities and demand for recreation (City of

Beverly Hills 2008a and 2016). The proposed project would add 340 housing units, which is only 37 units more than the planned 303 residential units under the Existing Specific Plans, and up to 30 accessory spaces that could be used for various purposes (e.g., staff living quarters, rooms for offices, wine storage, or other ancillary storage). Assuming the 30 accessory spaces would be used for staff living quarters, the project would result in an estimated 851 residents based on the DOF estimate of 2.30 persons per household within the City, compared to the 697 residents the Existing Specific Plans would generate (an increase of approximately 22 percent; DOF 2020). In addition, the proposed project would reduce the number of hotel rooms on the project site compared to the Existing Specific Plans, which would reduce any potential impacts of hotel guest use of recreational facilities in the city. Under the proposed project, similar to the Existing Specific Plans, the public recreation land ratio would be 5.1 acres of public recreation land for every 1,000 residents (DOF 2020), which would not substantially alter the existing citywide demand for recreational lands. Redevelopment of the project site would not directly affect any existing or planned public land for recreation. Furthermore, the proposed project would increase the amount of publicly accessible open space with the development of 10 acres of open space, of which 4.5 acres would be botanical gardens open to the public, and 3.5 acres of open space reserved for project residents and guests of the hotel. In addition, the project applicant would be required to pay its fair share of Parks and Recreation Facilities Tax to the City, which generates funding for City parks and recreational facilities. The proposed project would result in a less than significant impact on public recreational lands, would not increase the severity of impacts to recreational lands beyond those identified in previous environmental documentation, and further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

17 Transportation

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	■	☐	☐	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	■	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	■	☐	☐	☐	☐
d. Result in inadequate emergency access?	☐	☐	☐	■	☐

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Traffic generated by the proposed project may impact existing circulation patterns and the traffic load and capacity of the existing area street system, which may result in a significant impact to circulation. Although previous environmental documentation included an analysis of traffic-related impacts from redevelopment of the project site, as well as mitigation measures to reduce impacts to a less than significant level, due to the age of the Traffic Impact Analyses associated with previous environmental documentation, local traffic conditions may have substantially changed. Furthermore, the City adopted a new General Plan Circulation Element subsequent to certification of the Beverly Hilton Specific Plan 2008 EIR. Therefore, the proposed project's impacts to circulation could potentially be significant and these issues will be studied further in the SEIR.

SUBSTANTIAL CHANGE IN CIRCUMSTANCES THAT MAY REQUIRE MAJOR EIR REVISIONS

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Previous environmental documentation did not assess project impacts related to CEQA Guidelines Section 15064.3, subdivision (b), as this was not an environmental issue under CEQA at the time either EIR was prepared (City of Beverly Hills 2008a and 2016). CEQA Guidelines Section 15064.3(b) identifies appropriate criteria for evaluating transportation impacts. It states that land use projects with vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact, and projects that decrease VMT compared to existing conditions should be presumed to have a less than significant transportation impact. The proposed project would generate vehicle trips from new residents accessing the project site, as well as employees and guests of the hotels and retail establishments associated with the proposed project. The proposed project would be infill development, which generally generates lower VMT than "greenfield" development (new development in rural or agricultural areas on the periphery of communities, or lands otherwise not previously planned for development). However, vehicle trips generate by the proposed project has the potential to exceed the VMT thresholds of significance and this subject requires further assessment. Therefore, the proposed project's impacts to VMT could potentially be significant and these issues will be studied further in the SEIR.

SUBSTANTIAL CHANGE IN CIRCUMSTANCES THAT MAY REQUIRE MAJOR EIR REVISIONS

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

As discussed in previous environmental documentation, an existing network of regional and local roadways serves the project area (City of Beverly Hills 2008a and 2016). Similar to the Existing Specific Plans, the proposed project would be designed to utilize the existing roadways in the vicinity, and no major changes to design or reconfiguration of existing roadways are anticipated. However, potential modifications to site access, as well as on-site circulation, are proposed. These include the regrading and realignment of Merv Griffin Way, the addition of a new private road at the western edge of the project site to provide access to the new residential towers, and reconfigured driveway access. These changes have the potential to increase hazards due to project design features. The final design of the proposed project, similar to the Existing Specific Plans, including internal circulation characteristics, curb cuts, driveways and other streetscape changes, would be subject to review by the Community Development Department's Transportation Division. Compliance with applicable regulations and standards would ensure that no hazards due to a design feature would occur. Although the site plans for the Existing Specific Plans were reviewed and related impacts were determined to be less than significant, the proposed project's site plans differ from the Existing Specific Plans' site plans and traffic conditions in the area have changed. Therefore, the proposed project could result in potentially significant impacts due to hazardous design features and this issue will be studied further in the SEIR.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

d. Would the project result in inadequate emergency access?

As discussed in previous environmental documentation, the project site has a high level of accessibility for emergency vehicles, both from a regional and a site perspective. Previous environmental documentation determined the Existing Specific Plans would not impede emergency access (City of Beverly Hills 2008a and 2016). Under the proposed project, both Wilshire and Santa Monica Boulevards provide direct routes to the project site for emergency vehicles. Once emergency vehicles have reached the site, they can access the on-site structures through Merv Griffin Way, Wilshire Boulevard, Santa Monica Boulevard, or the proposed new access driveway along the western boundary of the project site that would connect to Wilshire Boulevard and Santa Monica Boulevard. Smaller emergency vehicles, such as police cars and ambulances, would be able to access the subterranean parking structure as necessary and impacts would be less than significant. The proposed project's impacts related to emergency access would therefore be less than significant and further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

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18 Tribal Cultural Resources

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	■	☐	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	■	☐	☐	☐

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

Senate Bill 18 of 2004

As detailed under *Tribal Consultation*, SB 18 requires local governments to contact tribal organizations prior to making a decision to adopt or amend a general or specific plan. As required by SB 18, the Native American Heritage Commission (NAHC) was contacted to request a Sacred Lands File (SLF) search of the project site and a 0.25-mile radius surrounding it. The purpose of the SLF search is to identify lands or resources important to Native Americans and to assess the potential for project-related development to impact Native American resources. A request for a list of California Native American Tribes traditionally affiliated with the project area was submitted to the NAHC on July 24, 2020. On July 27, 2020, the NAHC provided the contact information for six tribes culturally affiliated with the project area: Soboba Band of Luiseño Indians, Gabrielino-Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, and Gabrieleño Band of Mission Indians – Kizh Nation.

Assembly Bill 52

As further described under *Tribal Consultation*, AB 52 expanded CEQA by defining a new resource category, "tribal cultural resources."

AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074(a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project."

Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

The City has begun Native American consultation under AB 52 by sending letters on August 21, 2020 to the NAHC identified Native American groups and individuals (Soboba Band of Luiseño Indians, Gabrielino-Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Gabrieleño/Tongva San Gabriel Band of Mission Indians, and Gabrieleño Band of Mission Indians – Kizh Nation) in an effort to identify any tribal cultural resources within the project site and/or its vicinity and to address any potential impacts to tribal cultural resources resulting from project-related development.

The Existing Specific Plans were approved prior to the adoption of AB 52; accordingly, tribal cultural resources are not assessed in previous environmental documentation for the project site. The City will be conducting AB 52 consultation for the proposed project. The results of AB 52 consultation and the proposed project's potential impacts on tribal cultural resources will be included in the SEIR.

SUBSTANTIAL CHANGE IN CIRCUMSTANCES THAT MAY REQUIRE MAJOR EIR REVISIONS

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19 Utilities and Service Systems

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Would the project:					
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	■	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	■	☐	☐	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	■	☐

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	■	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	■	☐

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water

Previous environmental documentation also stated the City Engineer had indicated that the fire flow of 1,000 to 1,500 gallons per minute (gpm) measured at hydrants serving the project site may not be adequate for redevelopment of the project site, and that such an impact could potentially be significant. Previous environmental documentation included Mitigation Measure MM-WTR-1; however, that mitigation measure may be outdated. Therefore, this issue will be studied further in the SEIR. Water supply entitlements are discussed in Response (b).

Wastewater Treatment

Previous environmental documentation also concluded sufficient treatment capacity exists at the Hyperion Wastewater Treatment Plant (WWTP) to accommodate the wastewater discharged by buildout associated with the Existing Specifics Plans. The Hyperion WWTP has a dry weather design capacity of 450 million gallons per day and is currently processing an average of 275 million gallons per day, resulting in 175 million gallons per day of available capacity. The City of Beverly Hills has entered into a joint treatment and disposal agreement with the City of Los Angeles, which eliminates entitlements and reduces limitations previously set on the amount of sewage discharged

to the Hyperion WWTP. The City of Beverly Hills has access to the Hyperion WWTP's excess capacity upon payment of Amalgamated Sewerage System Facilities Charges to the City of Los Angeles.

In previous environmental documentation, buildout associated with the Existing Specific Plans was estimated to result in gross wastewater generation of approximately 50 million gallons per year, which represents a net increase in wastewater generation of approximately six million gallons per year over wastewater generation from the existing (2007) uses on the project site. However, the proposed project would only include construction of a total of 340 residential units, and up to 30 accessory spaces that could be used for various purposes (e.g., staff living quarters, rooms for offices, wine storage, or other ancillary storage). Assuming the 30 accessory spaces would be used for staff living quarters, the project would result in 67 more total residential units than the Existing Specific Plans. In addition, the proposed project would result in a net reduction of hotel rooms and retail/commercial square footage on the project site compared to the Existing Specific Plans; hotel rooms would be reduced by 56 (9 percent) and commercial/retail uses would be reduced by 23,121 sf (40 percent) (City of Beverly Hills 2008a and 2016). The net reduction of hotel rooms and commercial/retail uses would offset the majority of the increase in wastewater generation resulting from the project's 67 additional residential units (assuming accessory spaces are used for staff living quarters). In addition, standard City conditions of approval include the requirement for greywater systems to reduce overall water demands and the amount of wastewater that must be treated at off-site treatment facilities. As noted above, the Hyperion WWTP has 175 million gallons per day of available capacity; therefore, the project's incremental increase to wastewater generation in comparison to the Existing Specific Plans would not require the construction of new or expanded wastewater treatment facilities.

The City Public Works Department anticipated the existing wastewater system would be able to accommodate the additional flow generated by the Existing Specific Plans and buildout would not require construction of new wastewater treatment facilities or an expansion of existing facilities. However, the proposed restaurant use under the Existing Specific Plans had the potential to generate a heavier discharge of fats, oils, and grease, which was considered a potentially significant impact. Accordingly, previous environmental documentation included the following mitigation measure, which would also apply to the proposed project, to reduce the impact associated with discharge of waste from the proposed restaurant use (City of Beverly Hills 2008a and 2016):

MM-WW-1 The proposed restaurant shall install a Fat, Oil, and Grease (FOG) Interceptor to remove these substances from its wastewater before entering the sanitary sewer system. This device helps prevent these substances from clogging the sanitary sewer system. The device shall be regularly inspected by the Los Angeles County Department of Public Works.

Based on the above, the proposed project would not result in any new significant impacts related to wastewater treatment infrastructure and would not require or result in the relocation or construction of new or expanded wastewater treatment infrastructure. Further analysis of this issue is not warranted.

Stormwater Drainage

As discussed in Section 10, *Hydrology and Water Quality*, the entire project site is served by an existing stormwater collection and conveyance system. Previous environmental documentation determined redevelopment of the project site that would increase the area of pervious surfaces on the project site beyond that planned under the Existing Specific Plans, like the proposed project,

would not increase stormwater flow (City of Beverly Hills 2008a and 2016). The proposed project would increase the amount of landscaped area on the project site compared to the Existing Specific Plans. In addition, the proposed project would incorporate a series of rainwater management features, including collection, storage, filtration, distribution, and reuse of rainwater on the project site. Therefore, the proposed project would result in a less than significant impact to stormwater drainage and would not result in any new significant impacts related to stormwater drainage infrastructure. Further analysis of this issue is not warranted.

Electric Power, Natural Gas, and Telecommunications

Electricity service for the proposed project would be provided by Southern California Edison (SCE). Natural gas service would be provided by Southern California Gas Company (SoCal Gas). Telecommunications services would be provided at the discretion of future tenants. Electricity, natural gas, and telecommunications are generally available in the project area and are currently provided on the project site.

As discussed in Section 6, *Energy*, the proposed project would demand less energy than the Existing Specific Plans. In addition to complying with energy conservation requirements of the California Energy Code and the California Green Building Standards Code, the proposed project would also be designed to achieve a LEED Gold rating through environmentally-sensitive architecture and building systems, which would further reduce demand on regional electricity and natural gas infrastructure.

In addition to complying with the abovementioned standards and requirements, and being designed to achieve a LEED Gold rating and WELL Certification, implementation of Mitigation Measures MM-ENG-1 and MM-ENG-2 from previous environmental documentation, with minor edits as shown below, would further reduce utility infrastructure-related impacts (City of Beverly Hills 2008a and 2016):

MM-ENG-1 Prior to *issuance of building permits* ~~submittal of final plans~~, the applicant shall make necessary alterations to the generation or distribution system as required by SCE. The applicant shall then provide to the Beverly Hills Community Development Department a letter from SCE that states that electricity will be provided to the proposed project and that all applicable energy conservation features have been incorporated into the project design.

MM-ENG-2 Prior to *issuance of building permits* ~~submittal of final plans~~, the applicant shall complete a load survey in accordance with the Gas Company procedures and make any necessary alterations to the distribution system as required by the Gas Company. The applicant shall then provide to the Beverly Hills Community Development Department a letter from the Gas Company, which states that natural gas will be provided to the proposed project and that all applicable energy conservation features have been incorporated into the project design.

Therefore, the proposed project would not require or result in the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. Impacts would be less than significant. Further analysis of this issue is not warranted.

As discussed above, impacts to wastewater treatment, stormwater drainage, and electric power, natural gas, and telecommunications facilities would be less than significant and further analysis of these issues is not warranted. However, the project's fire flow requirements may result in significant

impacts to water facilities requiring updates to existing mitigation measures. Therefore, this issue will be studied further in the SEIR.

NEW INFORMATION SHOWING POTENTIALLY NEW OR GREATER SIGNIFICANT EFFECTS THAN PREVIOUS EIR

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

Previous environmental documentation concluded water supplies would be adequate to serve buildout associated with redevelopment of the project site under the Existing Specific Plans (City of Beverly Hills 2008a and 2016). The City's water supply consists mostly of imported water purchased from the Metropolitan Water District of Southern California, with some groundwater pumping from the Hollywood Basin (City of Beverly Hills 2016). Although sufficient water supply was available for the Existing Specific Plans, ongoing drought conditions in California have changed the status of statewide water supplies since that time. Furthermore, the City has adopted new policies aimed at water conservation and explored the possibility of developing new supplies, such as increased pumping of groundwater from the Hollywood Basin underlying the project site. As such, the proposed project could involve new or increased severity impacts to water supply and this issue will be studied further in the SEIR.

SUBSTANTIAL CHANGE IN CIRCUMSTANCES THAT MAY REQUIRE MAJOR EIR REVISIONS

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

As detailed above under item (a), the proposed project would generate less wastewater than the Existing Specific Plans, and the Hyperion WWTP was determined to have sufficient capacity to accommodate wastewater from development under the Existing Specific Plans. In addition, standard City conditions of approval include the requirement for greywater systems to reduce overall water demands and the amount of wastewater that must be treated at off-site treatment facilities. Therefore, the proposed project would not result in any new significant impacts related to wastewater treatment capacity. Further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The Solid Waste Division of the City Public Works Department is responsible for solid waste collection in Beverly Hills. The City contracts with Athens Environmental Services for waste hauling and collection services. The disposal of solid waste occurs at one of three designated landfills: Sunshine Canyon Landfill, Calabasas Sanitary Landfill, and the Commerce Refuse-to-Energy Facility. As shown in Table 4, these landfills have a combined remaining capacity of 73.05 million tons with a combined maximum permitted throughput of 22,600 tons per day (CalRecycle 2020).

Table 4 Solid Waste Disposal Facilities

Facility	Permitted Daily Throughput (tons per day)	Average Daily Waste Quantities Disposed (tons per day)	Estimated Remaining Permitted Capacity (million tons)	Estimated Closure Date
Calabasas Landfill	3,500	951	5.95	2029
Sunshine Canyon City/County Landfill	12,100	7,496	62.11	2037
Commerce Refuse-to-Energy Facility	1,000	299	N/A	N/A
Total	**22,600**	**11,158**	**73.05**	**--**

Sources: CalRecycle 2020

N/A = not applicable

Previous environmental documentation concluded redevelopment of the project site would result in a less than significant impact related to the generation of solid waste (City of Beverly Hills 2008a and 2016). During construction, the handling of all debris and waste would be subject to the City's and the State's (under AB 939) requirements for salvaging, recycling, and reuse of materials from construction activity on the project site. At least 75 percent of debris generated from demolition activities would be diverted from landfills in compliance with AB 939 and the green building standards set forth in Section 4.10 of the Beverly Hilton Specific Plan. Because the proposed project would involve construction activities similar to those of the Existing Specific Plans and would generate a similar amount of construction-related solid waste, impacts related to solid waste during construction would be less than significant. Therefore, further analysis of this issue is not warranted.

As previously stated, the proposed project would include construction of 340 residential units, 37 more residential units than the Existing Specific Plans, and up to 30 accessory spaces that could be used for various purposes (e.g., staff living quarters, rooms for offices, wine storage, or other ancillary storage. The proposed project would result in a net reduction of hotel rooms (56 fewer rooms) and retail/commercial square footage (23,121 sf less) on the project site compared to the Existing Specific Plans. The net reduction of hotel rooms and commercial/retail uses would offset the majority of the increase in solid waste generation resulting from the project's 67 additional residential units (assuming accessory spaces are used for staff living quarters). In addition, as required by law, at least 50 percent of solid waste would be diverted from landfills, and as noted above, there is a combined daily throughput surplus at local landfills of 11,442 tons per day. Accordingly, the proposed project would not result in any new significant impacts related to generating solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, and would not impair attainment of solid waste reduction goals or regulations beyond those identified in previous environmental documentation. Therefore, further analysis of this issue is not warranted.

LESS THAN SIGNIFICANT IMPACT/NO CHANGES OR NEW INFORMATION REQUIRING PREPARATION OF AN EIR

20 Wildfire

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☐	■
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☐	■
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☐	■
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides,					

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☐	■

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project site is developed and located within an urban setting. As discussed in Section 9, *Hazards and Hazardous Materials*, Section 15, *Public Services*, and Section 17, *Transportation*, the proposed project would not impair emergency response or evacuation plans or impede emergency access to the project site or its surroundings. Furthermore, the project site is not located in state responsibility areas or lands classified as very high fire hazard severity zones (VHFHSZ); the nearest VHFHSZ is located approximately 0.8 mile north of the project site and is separated by intervening structures, roadways, and urban development (CalFIRE 2011). Therefore, the project would have no impact on emergency response and evacuation and further analysis of this issue is not warranted.

NO IMPACT

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The project site is located in an urban area and is not adjacent to wildlands or other landscapes subject to wildfire risk and is approximately 0.8 mile from the nearest VHFHSZ (CalFIRE 2011). The proposed project would consist of infill development and would include hotel, residential, and retail uses, as well as a botanical garden. As discussed in Section 9, *Hazards and Hazardous Materials*, the botanical garden would be designed and maintained according to best practices to reduce the risk of fire on vegetated portions of the project site. Due to the urban nature of the project site, the distance of the project site from the nearest VHFHSZ, and the proposed uses, the proposed project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Further analysis of this issue is not warranted.

NO IMPACT

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The proposed project is located in an urban area and is well served by existing roadways and utilities. The proposed project would not require the installation or maintenance of infrastructure that could exacerbate fire risk. See Section 19, *Utilities and Service Systems*, of this Initial Study for a discussion of the proposed project's potential impacts related to water sources, power, and other utilities. Further analysis of utilities infrastructure as it relates wildfire is not warranted.

NO IMPACT

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project site is in an urban area and is located approximately 0.8 mile from the nearest VHFHSZ (CalFIRE 2011). As discussed in Section 7, *Geology and Soils*, Section 9, *Hazards and Hazardous Materials*, and Section 10, *Hydrology and Water Quality*, the project site and its vicinity are relatively flat, is not located near any rivers or streams, and is not subject to significant risks of flooding or landslides. Therefore, the risk of wildfire at the project site is considered low and the proposed project would not expose people or structures to significant risks associated with wildfires including downslope flooding or landslides. Further analysis of this issue is not warranted.

NO IMPACT

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21 Mandatory Findings of Significance

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
Does the project:					
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	■	□	□	□	□
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the					

	Substantial Change in Project That May Require Major EIR Revisions	Substantial Change in Circum-stances That May Require Major EIR Revisions	New Information Showing Potentially New or Greater Significant Effects than Previous EIR	Less than Significant Impact/No Changes or New Information Requiring Preparation of an EIR	No Impact
effects of probable future projects)?	☐	■	☐	☐	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	■	☐	☐	☐	☐

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

The project site is developed and located within an urban setting. Based on the preceding discussion, the proposed project would neither degrade the quality of the environment nor substantially affect any endangered fauna or flora. In addition, the proposed project would not impact rare, threatened, or endangered wildlife. However, demolition of portions of the Beverly Hilton Hotel may result in impacts to historic resources. As a result, the impact of the proposed project is potentially significant and potential historic resource impacts will be studied further in the SEIR.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

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

Since certification of previous environmental documentation for the project site, new developments have been constructed and additional developments in and around Beverly Hills have been approved or proposed. Potentially significant impacts associated with the proposed project, in combination with the effects of other past, current, and future projects in the vicinity of the project site, may have a cumulatively considerable effect. The impacts of the proposed project in combination with existing and currently planned and pending developments will be studied further in the SEIR.

SUBSTANTIAL CHANGE IN CIRCUMSTANCES THAT MAY REQUIRE MAJOR EIR REVISIONS

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

As discussed in the respective issue areas, the proposed project would have environmental effects that may cause substantial adverse effects on human beings, specifically related to air quality, noise, and transportation/traffic. These issues will be studied further in the SEIR.

SUBSTANTIAL CHANGE IN PROJECT THAT MAY REQUIRE MAJOR EIR REVISIONS

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List of Preparers

Rincon Consultants, Inc. prepared this Initial Study under contract to the City of Beverly Hills. Persons involved in data gathering analysis, project management, and quality control are listed below.

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Appendix A

One Beverly Hills Shadow Studies

Foster + Partners

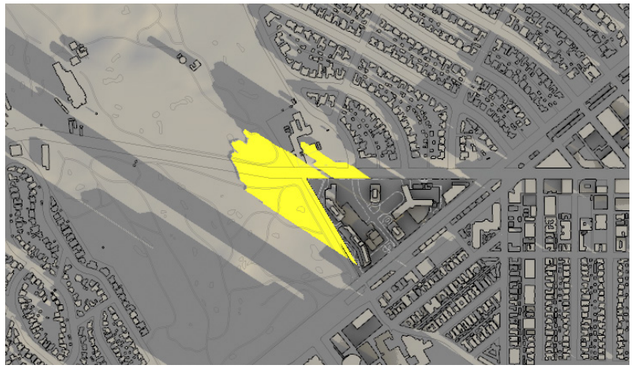
One Beverly Hills Shadow Studies

August 2020

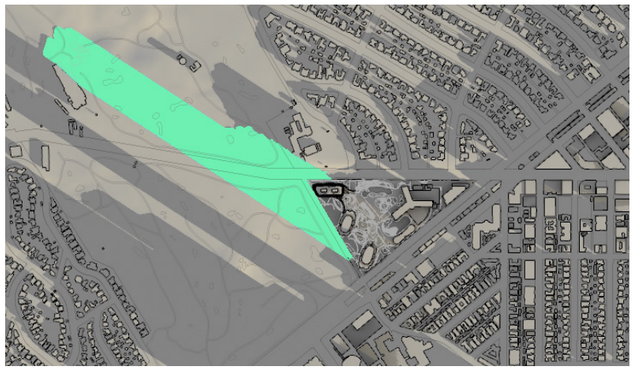
Solar Studies | Shadow Plots
Winter Solstice 7:30 AM

Foster + Partners

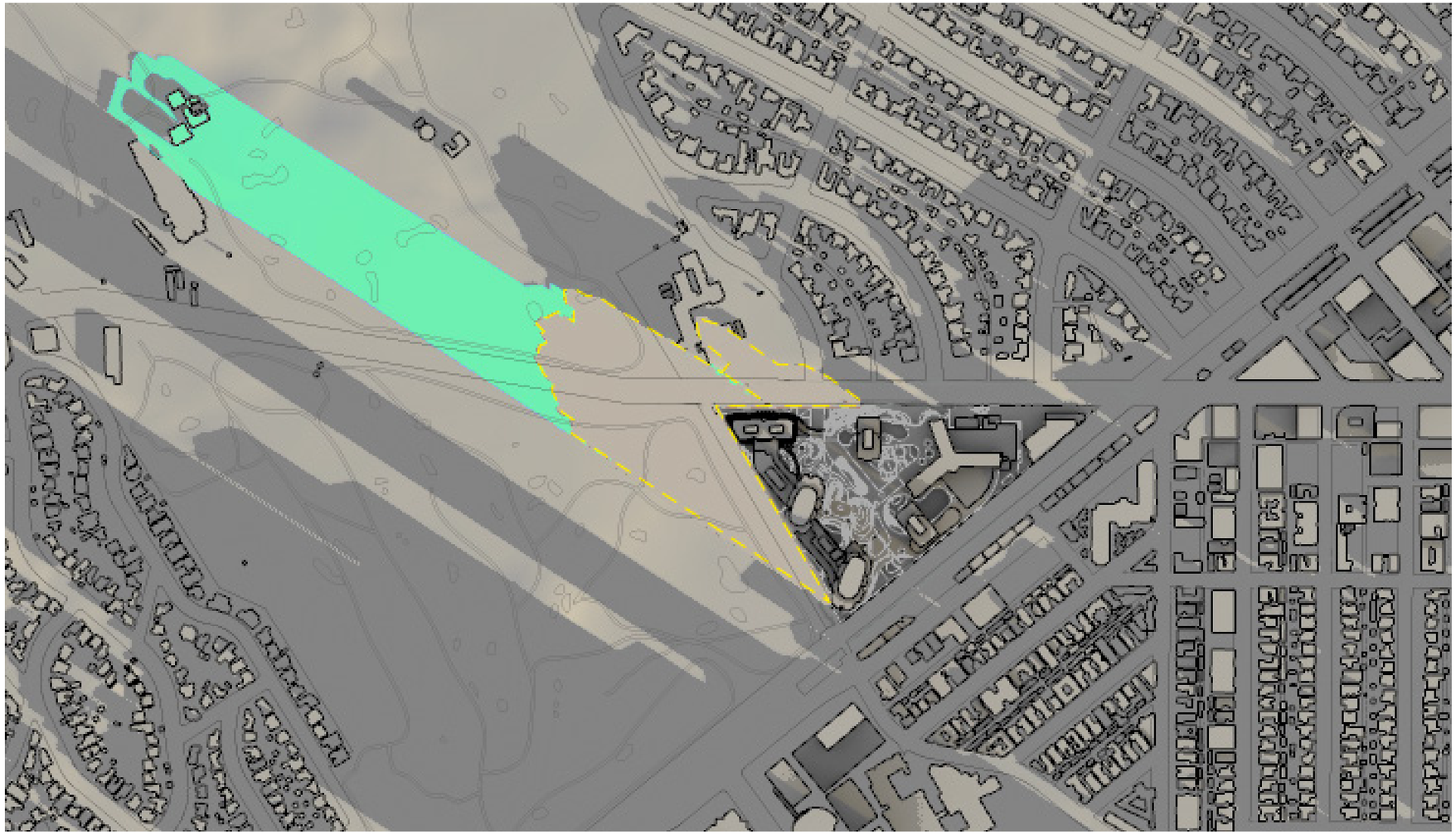
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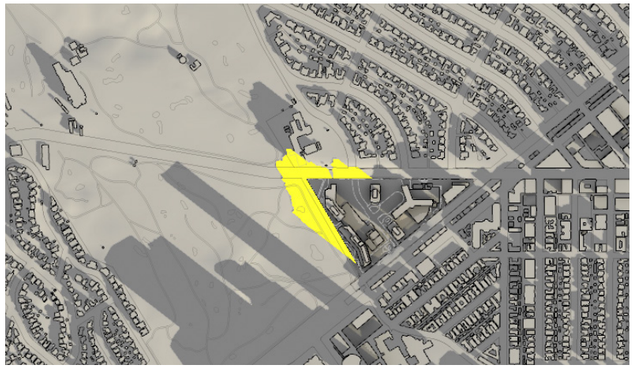
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4. Approved Project Outline

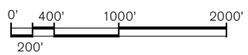
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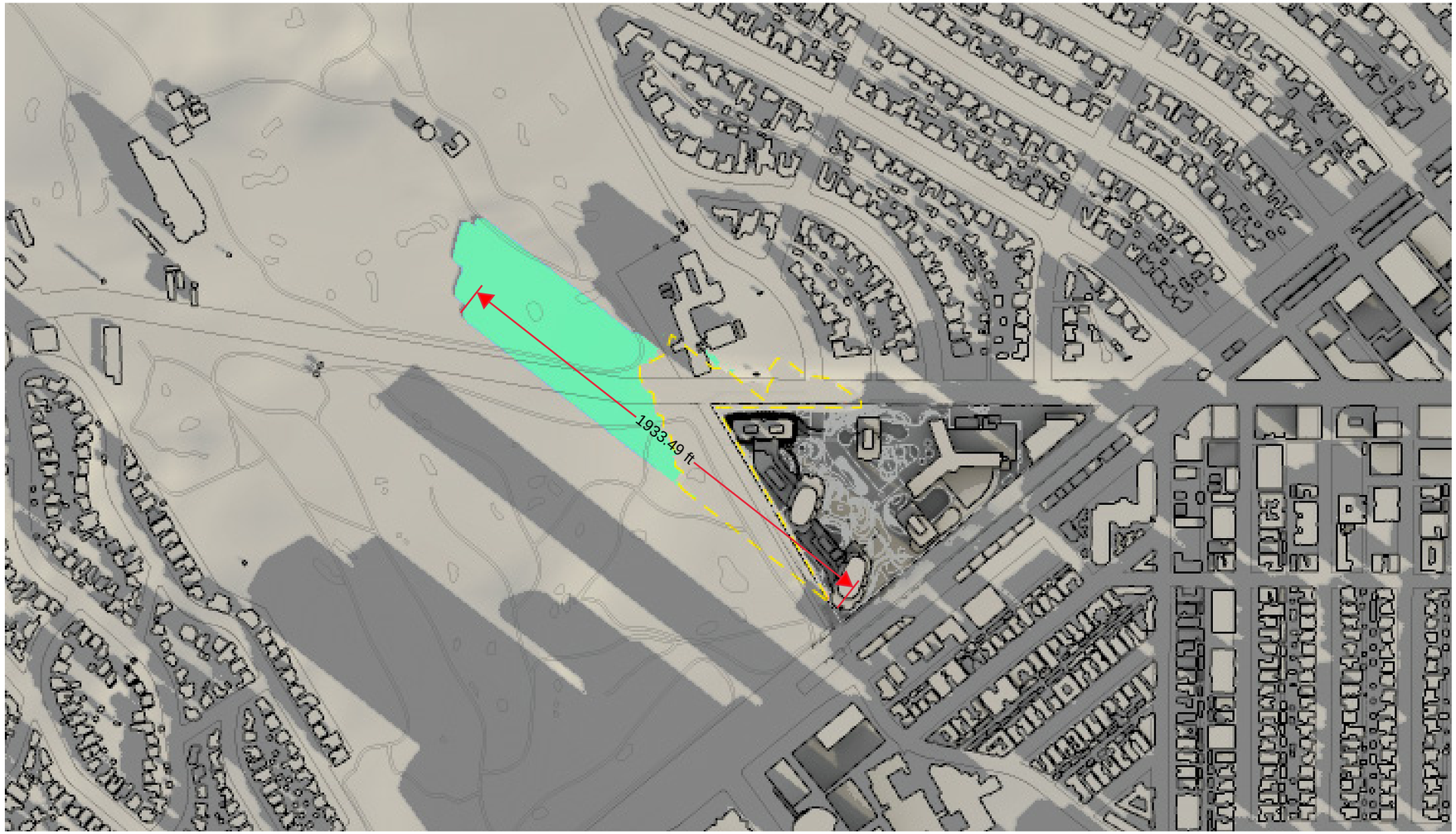
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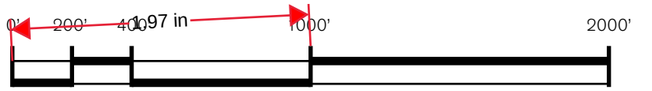




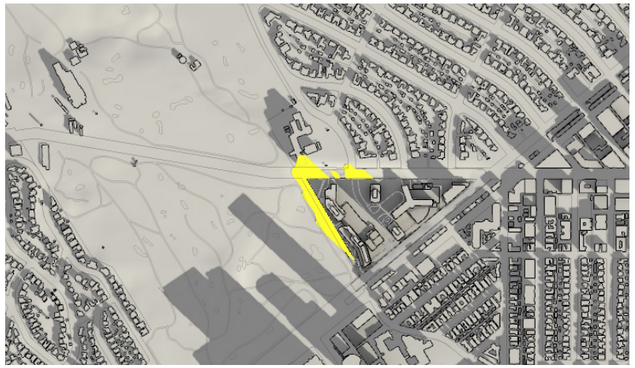
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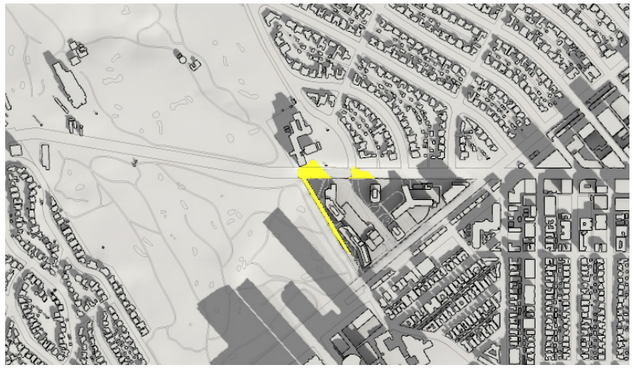
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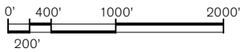
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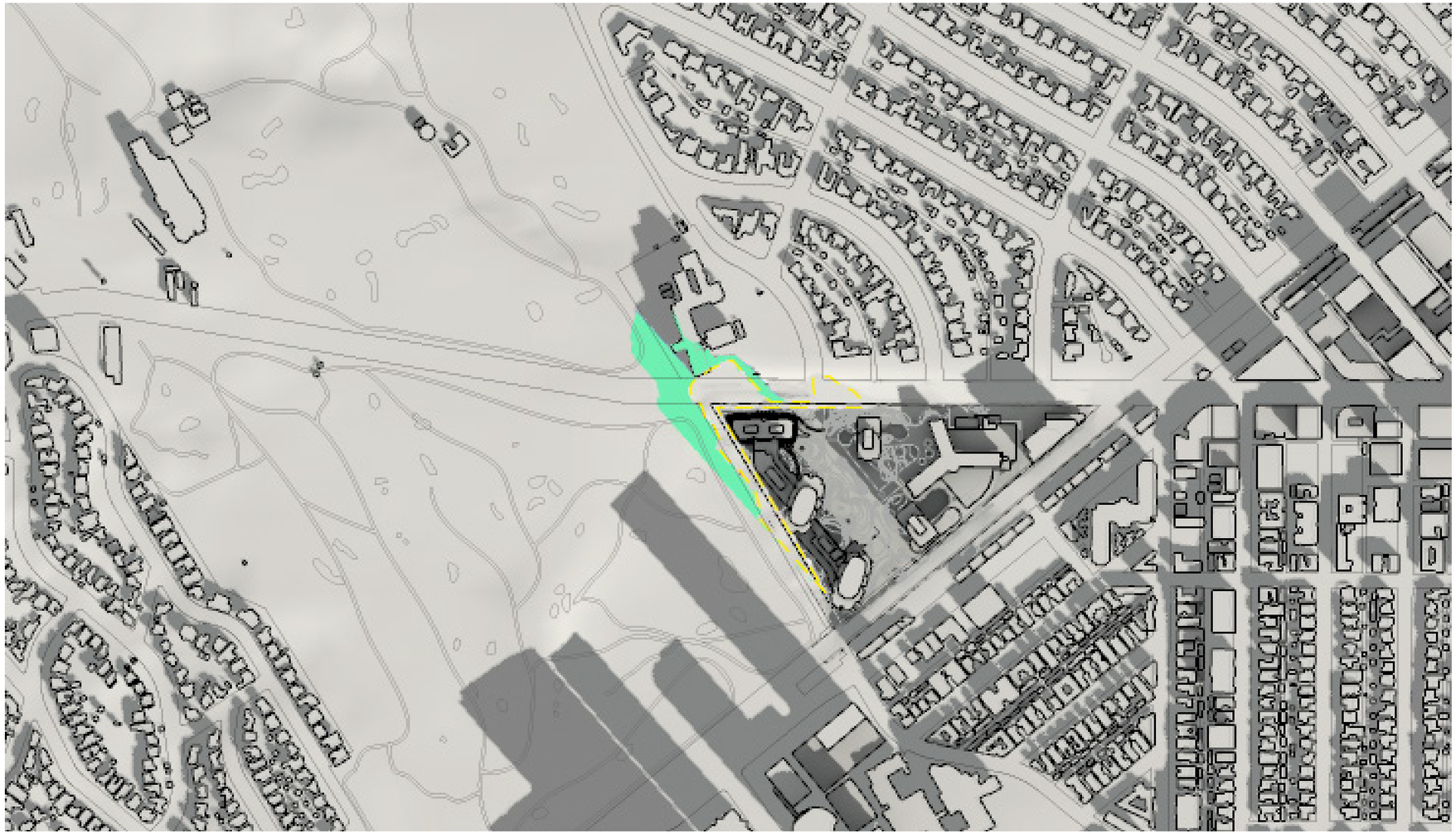
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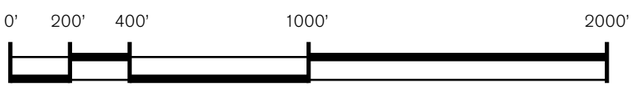




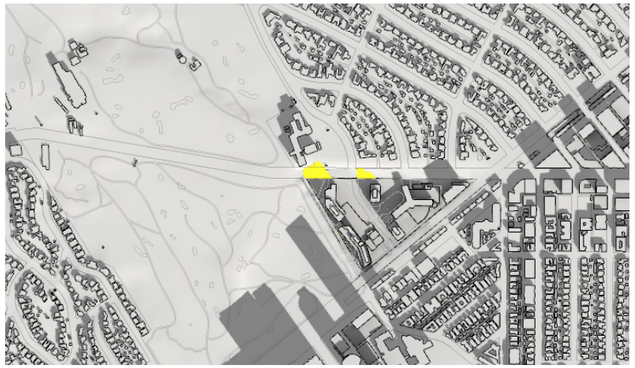
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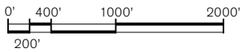
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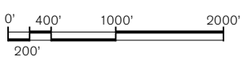


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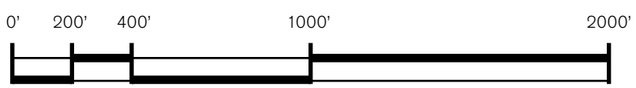




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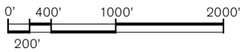
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3. Proposed Project
4. Approved Project Outline

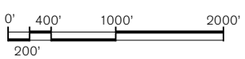


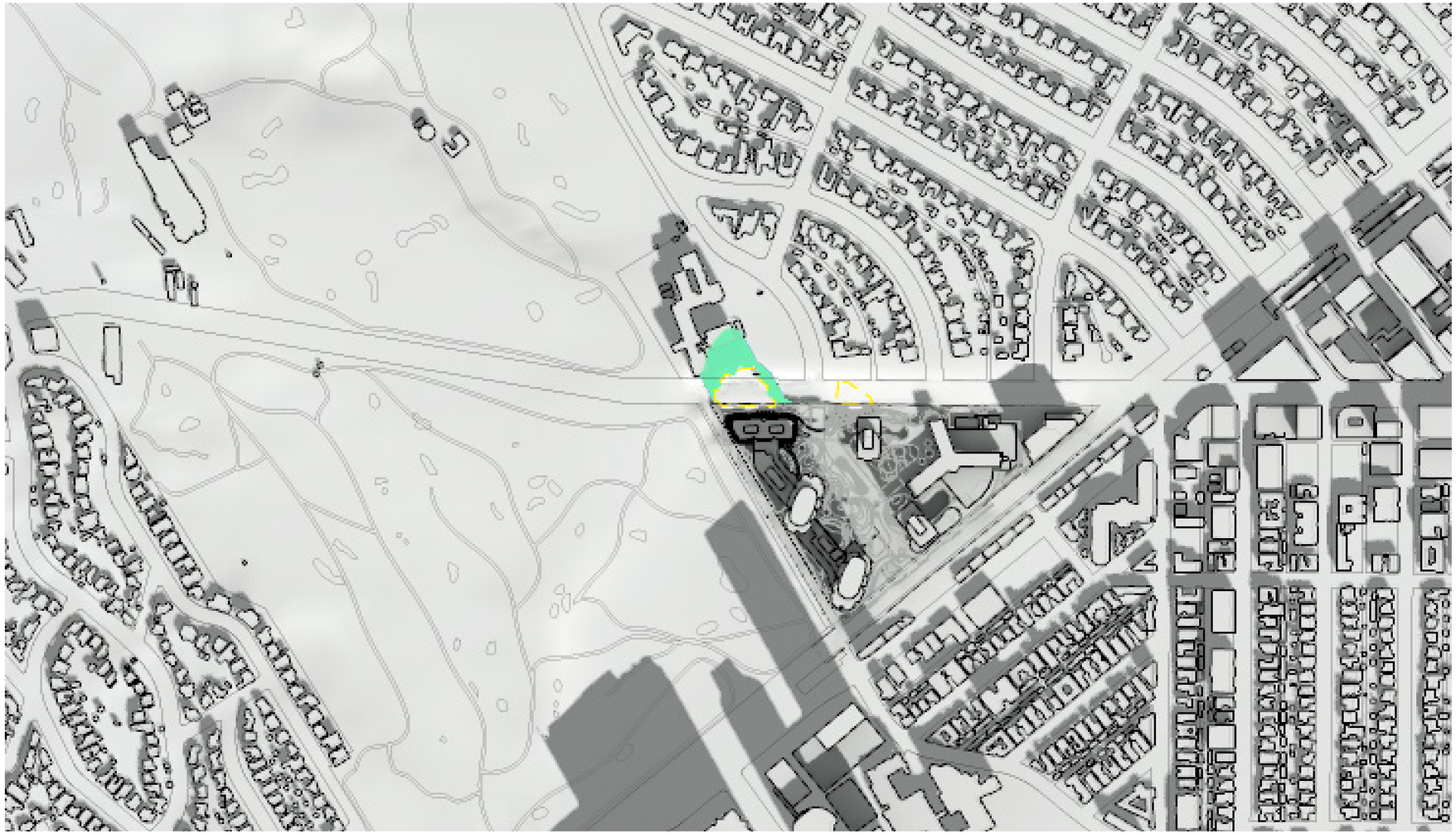
10:00 AM Difference between Approved and Proposed Massing







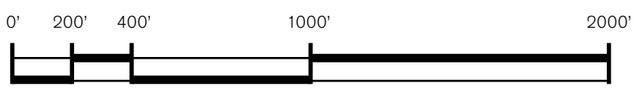




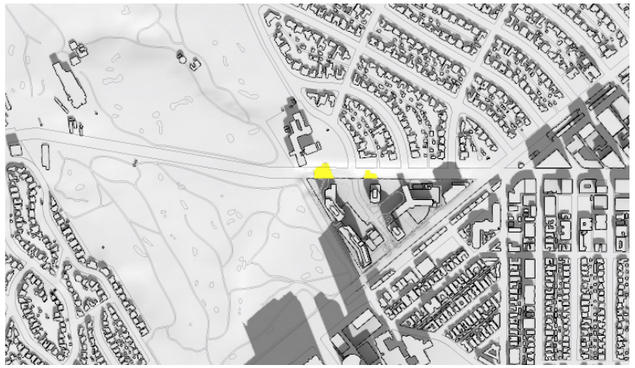
Note: Shading from trees and landscaping not shown.

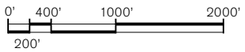
Legend

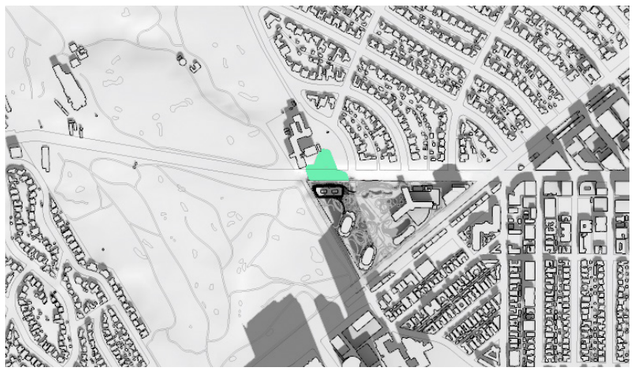
1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline

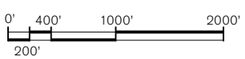


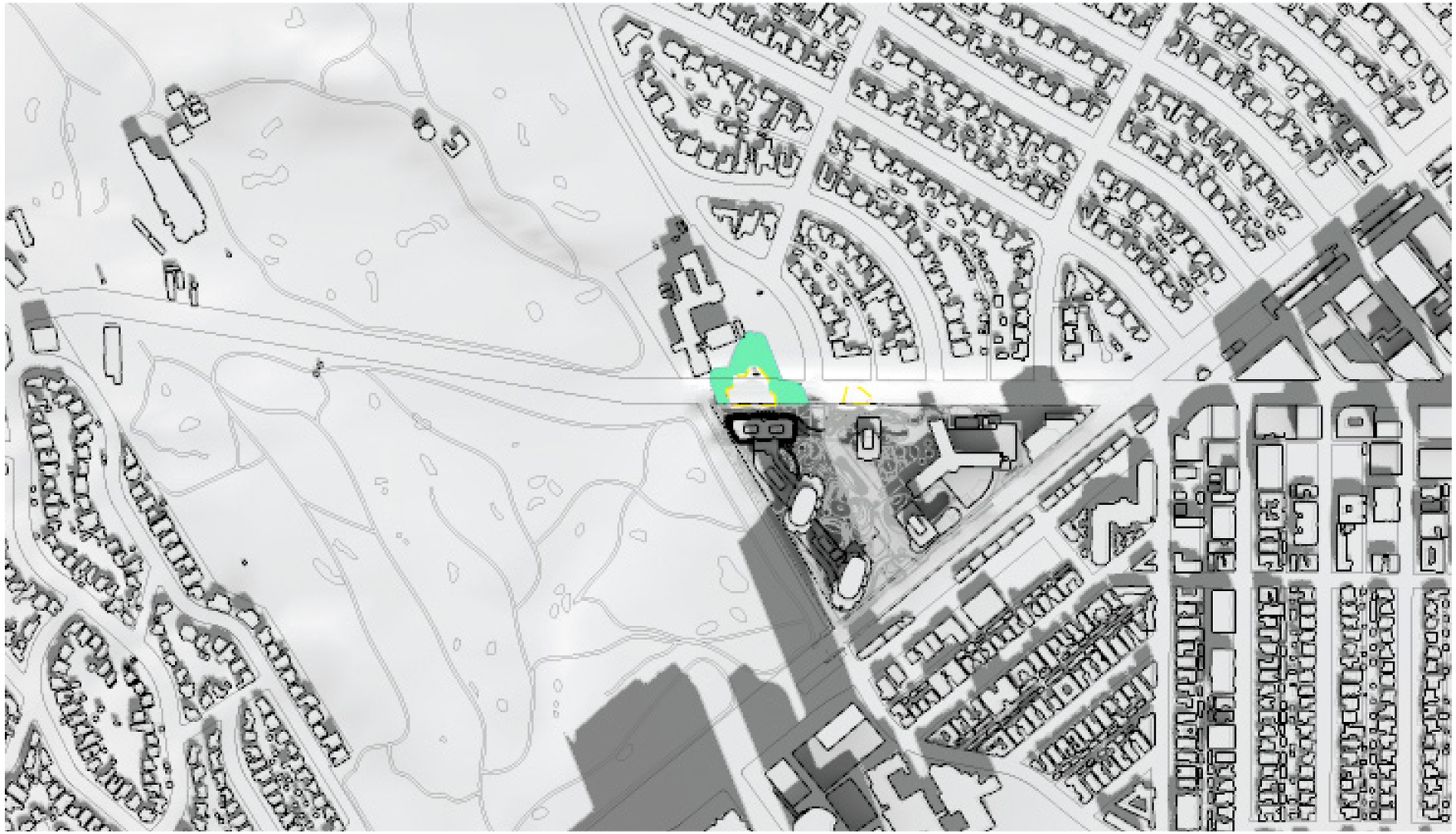
10:30 AM Difference between Approved and Proposed Massing







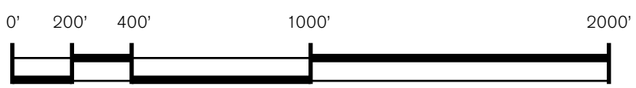




Note: Shading from trees and landscaping not shown.

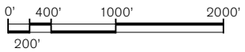
Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline

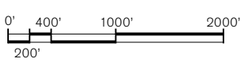


11:00 AM Difference between Approved and Proposed Massing







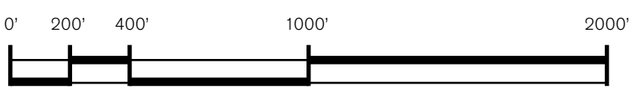




Note: Shading from trees and landscaping not shown.

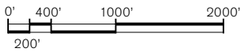
Legend

1. Existing Shadows
2. Approved Project
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4. Approved Project Outline

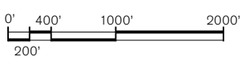


11:30 AM Difference between Approved and Proposed Massing







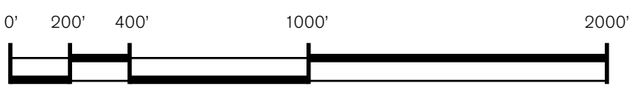




Note: Shading from trees and landscaping not shown.

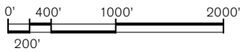
Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline

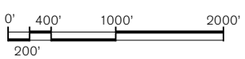


12:00 PM Difference between Approved and Proposed Massing







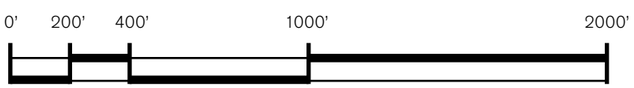




Note: Shading from trees and landscaping not shown.

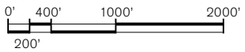
Legend

1. Existing Shadows
2. Approved Project
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4. Approved Project Outline

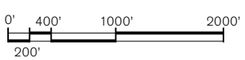


12:30 PM Difference between Approved and Proposed Massing







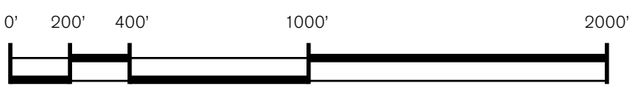




Note: Shading from trees and landscaping not shown.

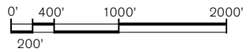
Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline



1:00 PM Difference between Approved and Proposed Massing







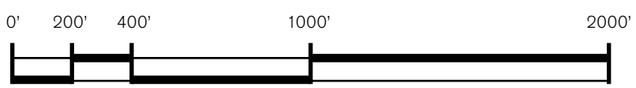




Note: Shading from trees and landscaping not shown.

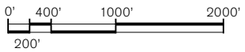
Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline

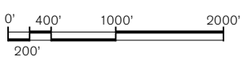


1:30 PM Difference between Approved and Proposed Massing







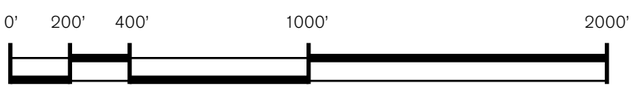




Note: Shading from trees and landscaping not shown.

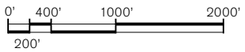
Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline

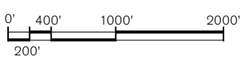


2:00 PM Difference between Approved and Proposed Massing







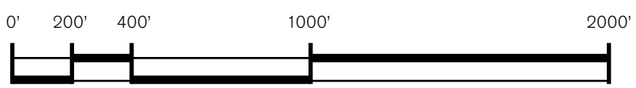




Note: Shading from trees and landscaping not shown.

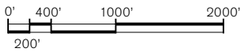
Legend

1. Existing Shadows
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4. Approved Project Outline



2:30 PM Difference between Approved and Proposed Massing







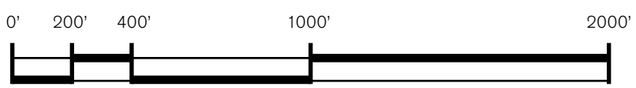




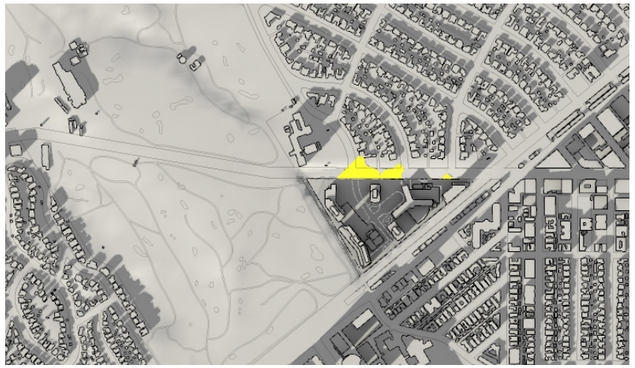
Note: Shading from trees and landscaping not shown.

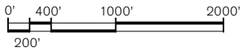
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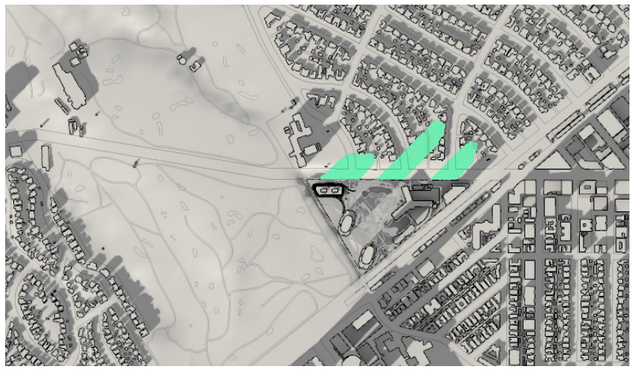
1. Existing Shadows
2. Approved Project
3. Proposed Project
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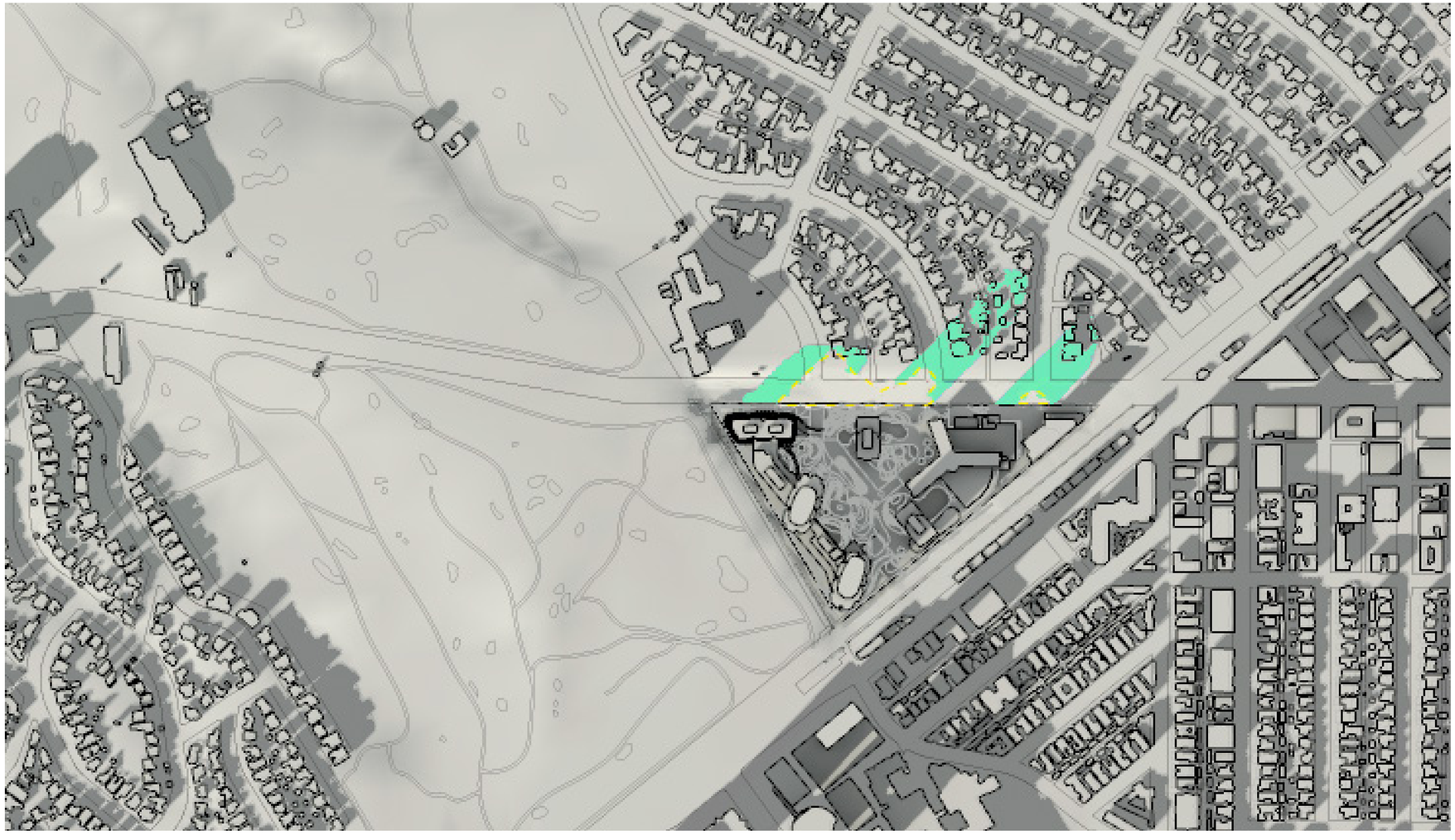
3:00 PM Difference between Approved and Proposed Massing







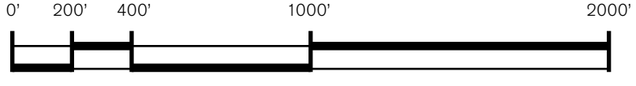




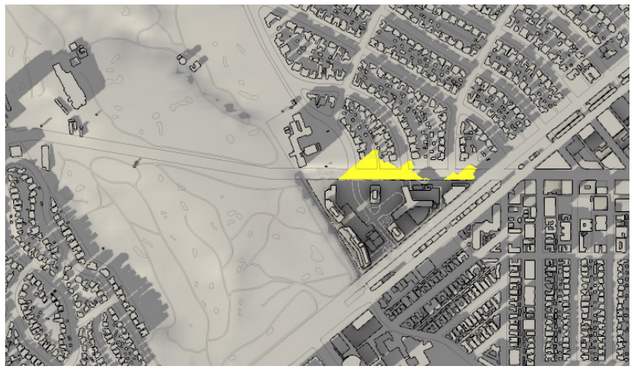
Note: Shading from trees and landscaping not shown.

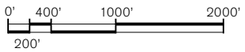
Legend

1. Existing Shadows
2. Approved Project
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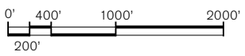


3:30 PM Difference between Approved and Proposed Massing







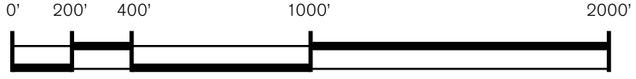




Note: Shading from trees and landscaping not shown.

Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline



4:00 PM - Shadows Indistinguishable





0' 400' 1000' 2000'
200'



0' 400' 1000' 2000'
200'

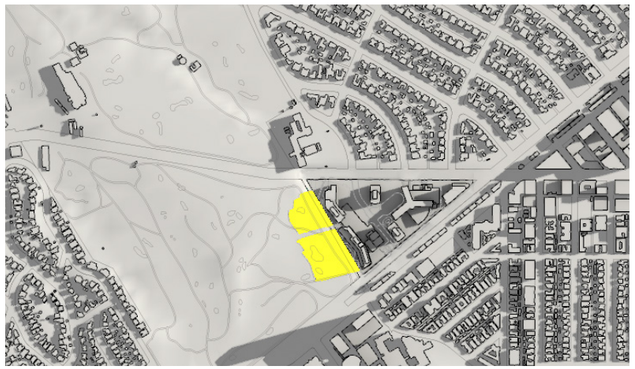
Note: Shading from trees and landscaping not shown.

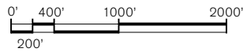
Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline

0' 200' 400' 1000' 2000'

7:30 AM Difference between Approved and Proposed Massing







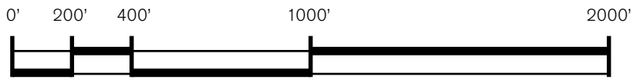




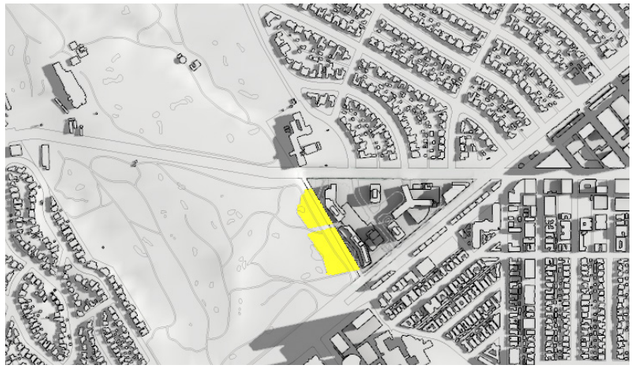
Note: Shading from trees and landscaping not shown.

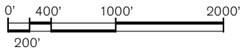
Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline



8:00 AM Difference between Approved and Proposed Massing







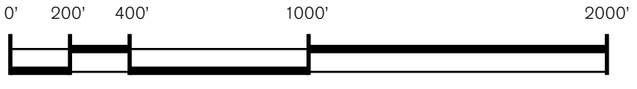




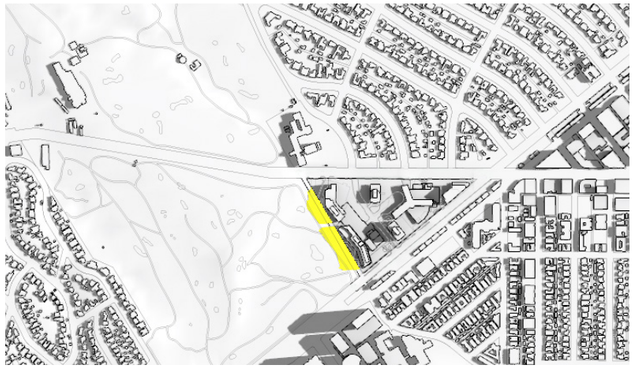
Note: Shading from trees and landscaping not shown.

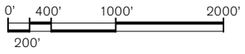
Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline



9:00 AM Difference between Approved and Proposed Massing







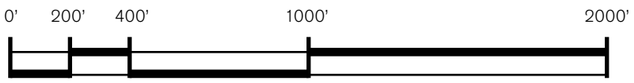




Note: Shading from trees and landscaping not shown.

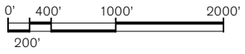
Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline



10:00 AM Difference between Approved and Proposed Massing







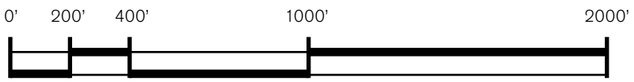




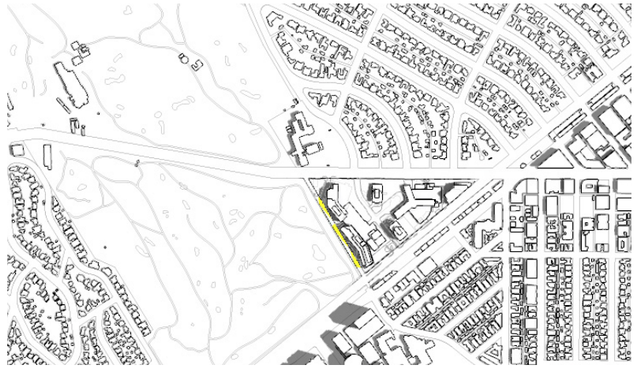
Note: Shading from trees and landscaping not shown.

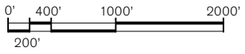
Legend

1. Existing Shadows
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11:00 AM Difference between Approved and Proposed Massing







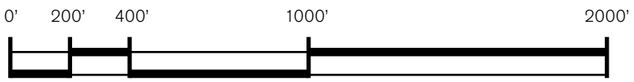




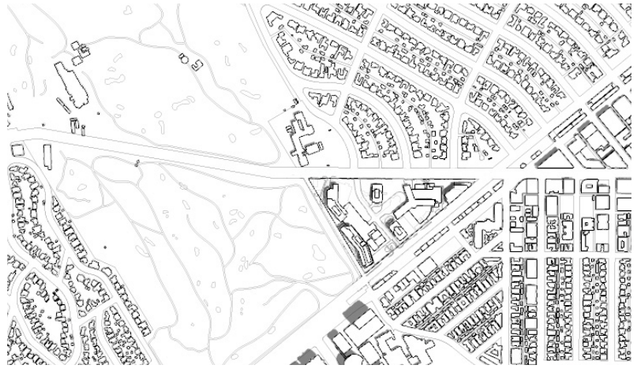
Note: Shading from trees and landscaping not shown.

Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
4. Approved Project Outline



12:00 PM Difference between Approved and Proposed Massing







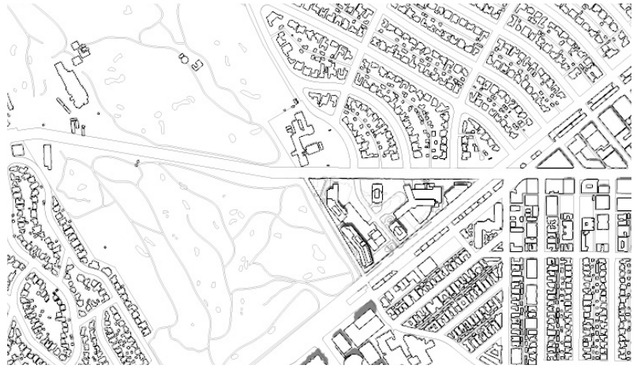
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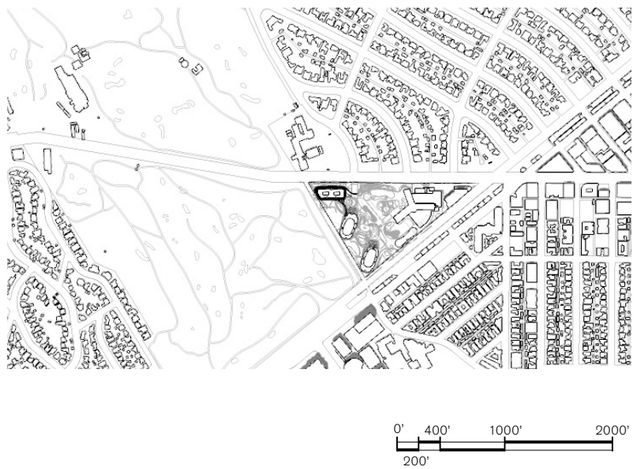
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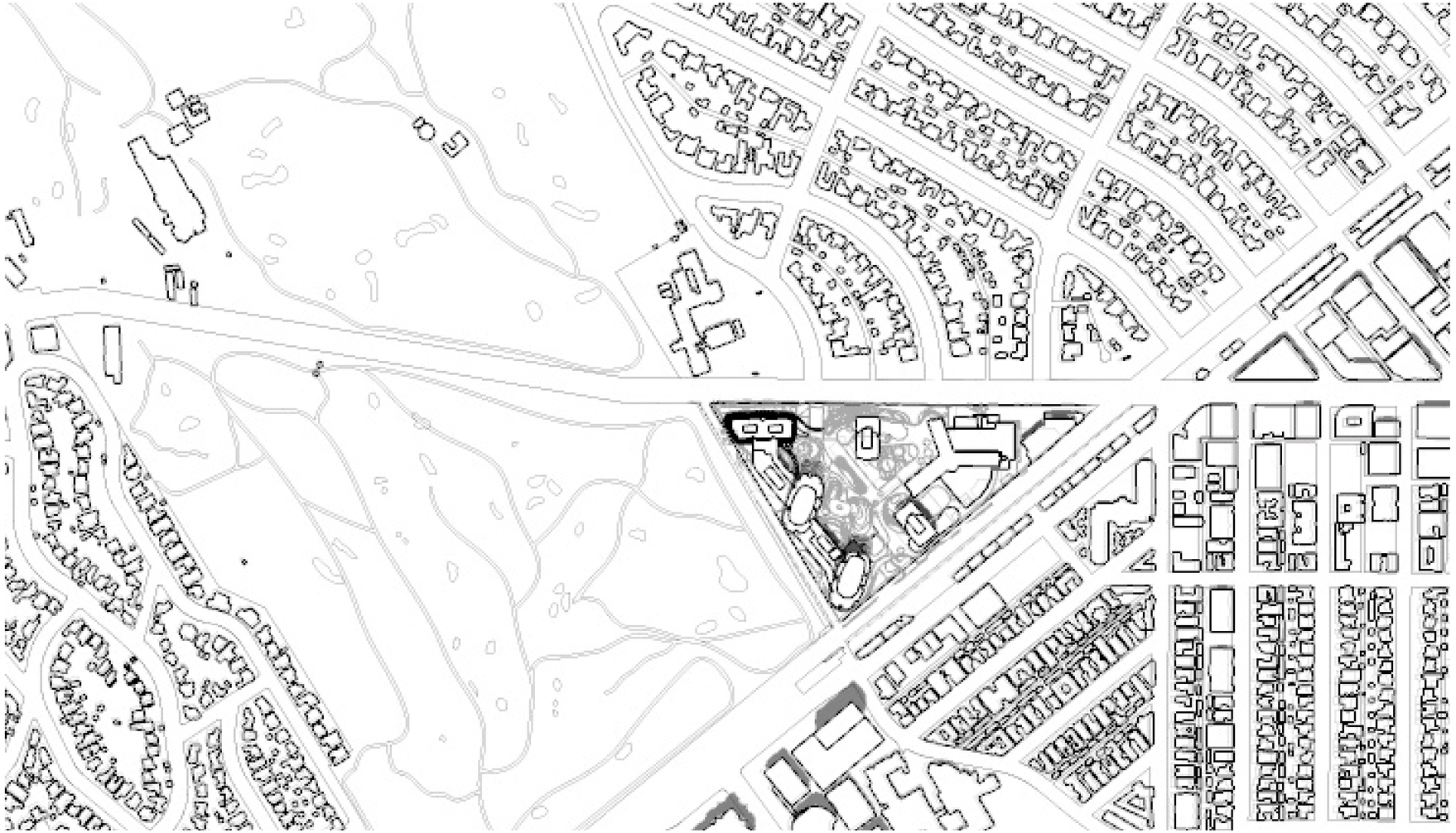
1. Existing Shadows
2. Approved Project
3. Proposed Project
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1:00 PM Difference between Approved and Proposed Massing



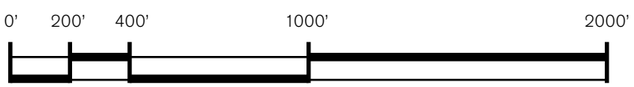




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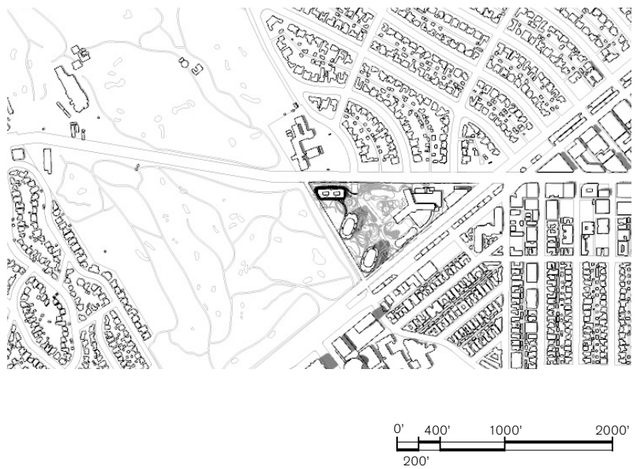
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1. Existing Shadows
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2:00 PM Difference between Approved and Proposed Massing







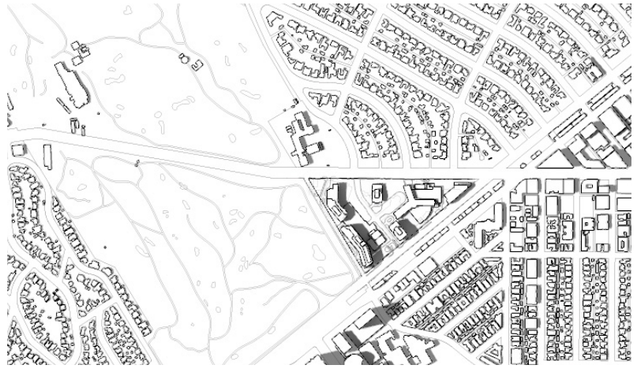
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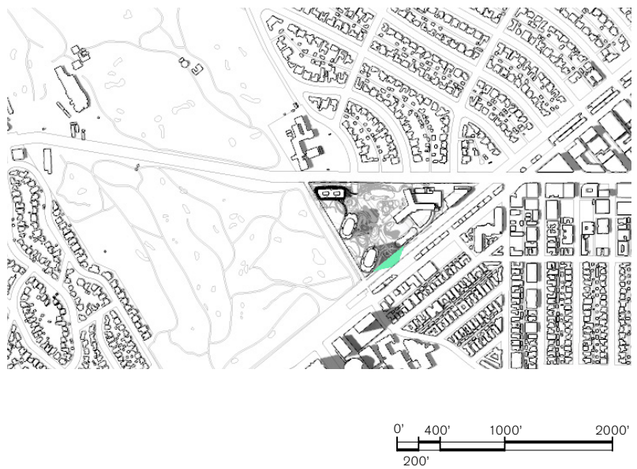
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1. Existing Shadows
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3:00 PM Difference between Approved and Proposed Massing







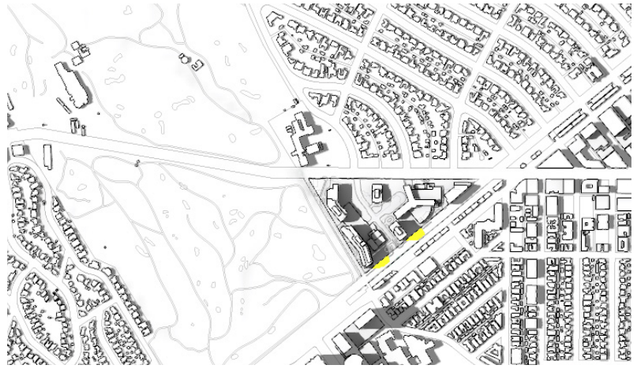
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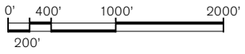
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1. Existing Shadows
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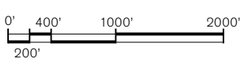
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4:00 PM Difference between Approved and Proposed Massing







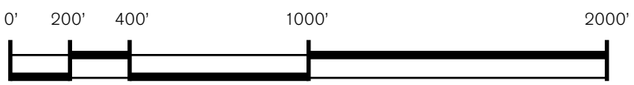




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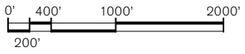
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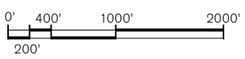


5:00 PM Difference between Approved and Proposed Massing







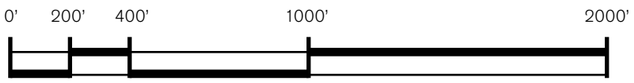




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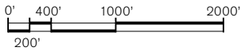
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1. Existing Shadows
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3. Proposed Project
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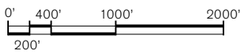


6:00 PM Difference between Approved and Proposed Massing







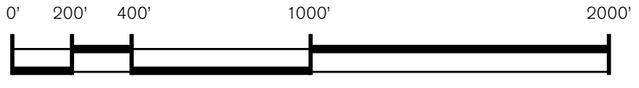




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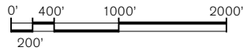
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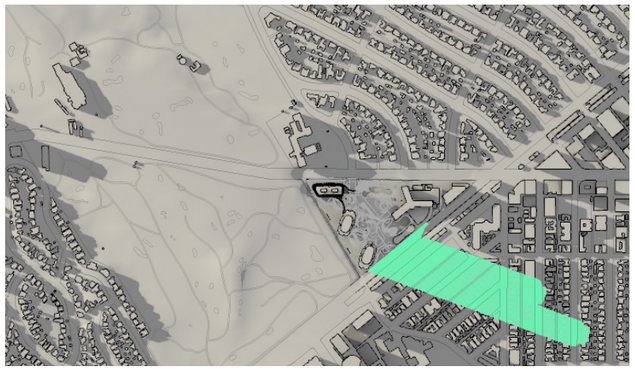
1. Existing Shadows
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3. Proposed Project
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7:00 PM Difference between Approved and Proposed Massing







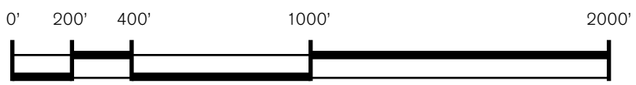




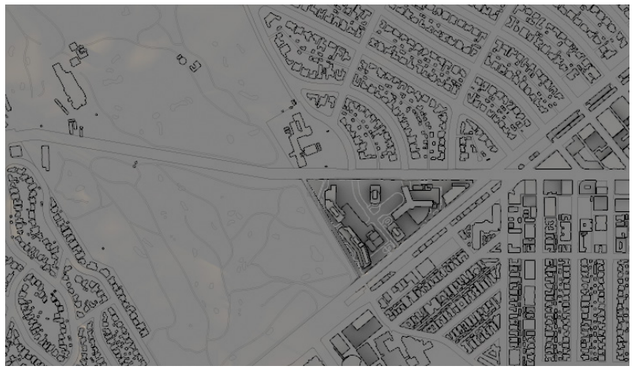
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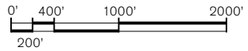
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1. Existing Shadows
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8:00 PM - Shadows Indistinguishable







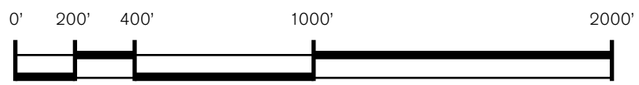




Note: Shading from trees and landscaping not shown.

Legend

1. Existing Shadows
2. Approved Project
3. Proposed Project
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Scoping Comments

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 266-3574
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

October 1, 2020

Masa Alkire, AICP
City of Beverly Hills
455 North Rexford Drive
Beverly Hills, CA 90210

RE: One Beverly Hills North Overlay Specific Plan – Notice of Preparation (NOP)
SCH# 2020090048
GTS# 07-LA-2020-03363
Vic. LA-405 / PM 30.853

Dear Masa Alkire:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Project includes the following: (1) New 162 residential unit, 499,806 SF, 32-story, 410' tall residential building (Santa Monica Residences); (2) New 141 residential unit, 424,266 SF, 28-story, 369' tall residential building (Garden Residences); (3) New 37 residential unit and 42 hotel room, 213,966 SF, 11-story, 124' tall hotel/residential building (Wilshire Building); (4) New 127, 324 SF amenities and support areas structure, including 30 residential accessory spaces that could be used for staff housing (Promenade); (5) Replacement 37,562 SF, 31' tall conference center for Beverly Hilton Hotel; (6) Replacement 72,697 SF, 20' tall hotel restaurant, retail, 36 hotel room, and support area structure (Beverly Hilton Enhancement); (7) 10-acres of open space, including 8-acre botanical garden. The Project would add a net total of 940 new vehicle parking spaces.

The nearest State facility to the proposed project is SR-405. After reviewing the NOP, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. However, due to the amount of motor vehicle parking being provided, the One Beverly Hills Overlay Specific Plan is still designed in a way that induces demand for additional vehicle trips. This demand should be addressed with appropriate design and management principles. Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. Housing affordability can also be improved by not building an unnecessary amount of parking.

- If the parking structure must be built, it should be designed in a way that is conducive to adaptive reuse. They should contain flat floors with ramps on the exterior edge, so that they can be more easily converted to more beneficial uses in the future.

- Caltrans also recommends that at least one long-term secure bicycle parking space should be provided per residential unit, allowing residents to more easily take advantage of the project's central location and choose the bicycle as their mode of travel.

- Long-term bicycle parking should be located onsite, on the ground floor, and within 200 feet of the pedestrian entrance to all main buildings.

This project site is also less than one mile from two major light rail stations which are part of the Metro Purple (D Line) Extension Transit Project. The forthcoming DEIR should reflect a project scope that includes robust walking and biking connections to the Wilshire/Rodeo and Century City/Constellation stations, both of which are expected to begin operations by 2025.

Additionally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2020-03363.

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

STATE OF CALIFORNIA Gavin Newsom, Governor

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
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[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
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Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

September 3, 2020

Masa Alkire, AICP
City of Beverly Hills
455 North Rexford Dr.
Beverly Hills, CA 90210

Re: 2020090048, One Beverly Hills Overlay Specific Plan Project, Los Angeles County

Dear Ms. Alkire:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

a. A brief description of the project.

b. The lead agency contact information.

c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).

d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

a. Alternatives to the project.

b. Recommended mitigation measures.

c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

a. Type of environmental review necessary.

b. Significance of the tribal cultural resources.

c. Significance of the project's impacts on tribal cultural resources.

d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

From:	Kwan-Davis, Ruby@Wildlife
To:	Masa Alkire
Cc:	Wilson-Olgin, Erinn@Wildlife; Tang, Victoria@Wildlife; Valand, Andrew@Wildlife; Silva, Felicia@Wildlife; Howell, Susan@Wildlife; state.clearinghouse@opr.ca.gov
Subject:	CDFW Comments for One Beverly Hills Overlay Specific Plan NOP
Date:	Friday, September 25, 2020 2:39:03 PM
Attachments:	CDFW Comments for One Beverly Hills Overlay Specific Plan NOP.pdf

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Dear Masa Alkire,

The California Department of Fish and Wildlife has completed review of a Notice of Preparation (NOP) of a Draft Environmental Impact Report submitted by the City of Beverly Hills for the One Beverly Hills Overlay Specific Plan Project (SCH # 2020090048). Please find CDFW's comment letter attached. Thank you for the opportunity to provide comments. If you have any questions or concerns regarding CDFW's comments, please feel free to contact CDFW at your convenience.

Sincerely,
Ruby

Ruby Kwan-Davis
Senior Environmental Scientist (Specialist)
Temporary Number: (657) 215-1007
Email: Ruby.Kwan-Davis@wildlife.ca.gov

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

September 25, 2020

Masa Alkire
City of Beverly Hills
455 N Rexford Dr
Beverly Hills, CA 90210
malkire@beverlyhills.org

Subject: Notice of Preparation of a Draft Environmental Impact Report for the One Beverly Hills Overlay Specific Plan Project, SCH #2020090048, City of Beverly Hills, Los Angeles County

Dear Masa Alkire:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the One Beverly Hills Overlay Specific Plan Project (Project). The NOP's supporting documentation includes the Initial Study. Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq*.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

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Project Description and Summary

Objective: The Project proposes to establish a new Overlay Specific Plan that would allow for the redevelopment of a 17.4-acre site in the City of Beverly Hills. Approximately 54 percent of the site is developed with existing structures and impervious surfaces. Approximately 46 percent of the site is graded and undeveloped. The site currently contains existing hotels with related facilities (Beverly Hilton and Waldorf Astoria Beverly Hills) at 9850-9876 Wilshire Boulevard; a gas station and convenience store at 9988 Wilshire Boulevard; and a vacant, partially excavated property at 9900 Wilshire Boulevard. Merv Griffin Way, a four-lane, north-south, private access road that is, and historically has been, open to public use, traverses through the center of the site.

The Overlay Specific Plan would be a standalone document and would not affect or replace the two existing, previously approved Specific Plans that regulate portions of the site. The Beverly Hilton Specific Plan was approved in 2008 and covers 9850-9876 Wilshire Boulevard. The 9900 Wilshire Specific Plan was approved in 2008 and amended in 2016 and covers 9900 Wilshire Boulevard. The proposed Overlay Specific Plan would regulate the future development of the 17.4-acre site in a unified development plan. The Overlay Specific Plan would allow for increased building heights to reduce impervious surfaces on the site. This would allow for the creation of approximately 10 acres of open space, including a publicly accessible botanical garden and a sculpture garden along Wilshire Boulevard.

Implementation of the proposed Overlay Specific Plan would result in the development of two residential buildings; a hotel/residential building; some alterations to existing Beverly Hilton structures; a parking structure; and structures for supporting amenities and features. Approximately 10 acres of the Project site would be open space. An elevated platform over Merv Griffin Way from the Beverly Hilton to the southwesterly property line would consist of an 8-acre botanical garden that would include native and cultured California plant species; sculptures; water features; shaded seating areas; two miles of walking/running pathways; a restaurant; and other amenities. One mile of pathways within approximately 4.5 acres of the botanical gardens would be accessible to the public. Another mile of pathways within approximately 3.5 acres of the botanical gardens would be reserved for residents, the Amenities Access Program, and hotel guests.

Location: The Project is located west of the intersection of Wilshire Boulevard and Santa Monica Boulevard on the western edge of the City of Beverly Hills. Specifically, the Project is located at 9850, 9876, 9900, and 9988 Wilshire Boulevard and Assessor's Parcel Numbers (APNs) 4327-028-002 through -016.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City of Beverly Hills in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW looks forward to commenting on the DEIR when it is released. CDFW may have additional comments to the DEIR not addressed in this letter.

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Specific Comments

1) Nesting Birds. The Project may involve removal or disturbance of trees along North Santa Monica Boulevard and trees located adjacent to the site in the Los Angeles Country Club. Accordingly, Project construction and activities may impact nesting birds. Project activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs, or nestlings, or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary.

    a) Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

    b) CDFW recommends that measures be taken, primarily, to avoid Project impacts to nesting birds. Proposed Project activities including (but not limited to) staging and disturbances to native and nonnative vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs.

    c) If impacts to nesting birds cannot be avoided, CDFW recommends the DEIR include measures to mitigate for impacts.

2) Bats. A search of CDFW's California Natural Diversity Database (CNDDB) found occurrences of several bat species within the Project vicinity (CDFW 2020a). These species include hoary bat (*Lasiurus cinereus*) and silver-haired bat (*Lasionycteris noctivagans*). Numerous bat species are known to roost in trees and structures throughout Los Angeles County. Cracks and crevices in large concrete structures and buildings provide suitable analogs for daytime and nighttime roosts. Trees between the Project site and Los Angeles Country Club and could provide potential roosting sites.

    a) Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). Project construction and activities, including (but not limited to) vegetation removal, increased noise, and ground disturbing activities, may have direct and/or indirect impacts on bats and roosts.

    b) CDFW recommends the DEIR provide a thorough discussion and adequate disclosure of potential impacts to bats and roosts from Project construction including (but not limited to) disturbances to vegetation, trees, and structures; demolition; grading; and excavating. If necessary, to reduce impacts to less than significant, the DEIR should provide bat-specific avoidance and/or mitigation measures [CEQA Guidelines, § 15126.4(a)(1)].

3) Landscaping. Implementation of the proposed Overlay Specific Plan would consist of an 8-acre botanical garden that would include native and cultured California plant species. The Initial Study defines "cultured" California plant species as "drought-tolerant, non-invasive plants." CDFW recommends that the DEIR include a complete list of native and cultured

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California plant species the Project/City of Beverly Hills is proposing for the botanical garden. For all other Project-related landscaping, CDFW strongly recommends avoiding non-native, invasive plants, particularly any species with a Moderate of High ranking by the California Invasive Plant Council (Cal-IPC 2020a). Specifically, CDFW strongly recommends avoiding fountain grasses (*Pennisetum* genus); pampas grasses (*Cortederia* genus); and pepper trees (*Schinus* genus).

CDFW recommends using native, locally appropriate plant species and drought tolerant, lawn grass alternatives to reduce water consumption. Information on alternatives for invasive, non-native, or landscaping plants may be found on the California Invasive Plant Council's, Don't Plant a Pest webpage (Cal-IPC 2020b). The Audubon Society's Native Plants Database is a resource to identify native plants and trees that will attract and benefit birds. Birds may help to control and reduce insects, reducing the need for pesticides (National Audubon Society 2020). The California Native Plant Society's Gardening and Xerces Society's Pollinator-Friendly Native Plant Lists webpage has information on native plant species that invite insects and pollinators (CNPS 2020; Xerces Society 2020). Pollinators are critical components of our environment and essential to our food security. Insects – and primarily bees – provide the indispensable service of pollination to more than 85 percent of flowering plants (Ollerton et al. 2011).

General Comments

1) Biological Baseline Assessment. Page 55 of the Initial Study states, "Previous environmental documentation concluded the Existing Specific Plans would not have any significant impacts on biological resources (City of Beverly Hills 2008a and 2016)." CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Biological surveys conducted for the 2008 Final Environmental Impact Report for the Beverly Hilton Revitalization Plan and 2016 Final Supplemental Environmental Impact Report for the 9900 Wilshire Boulevard Project may not accurately reflect biological resources that could now be in the Project site. Moreover, the property at 9900 Wilshire Boulevard has been vacant for at least five years.

   In preparation of the DEIR, CDFW recommends providing a recent and complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The DEIR should include the following information:

   a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities

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that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting Vegetation Classification and Mapping Program - Natural Communities webpage (CDFW 2020b);

b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site;

c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. The Manual of California Vegetation (MCV), second edition, should also be used to inform this mapping and assessment (Sawyer 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;

d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project. CDFW's CNDDB in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting CNDDB Field Survey Forms (CDFW 2020c); and,

e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern, and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS.

2) Biological Direct, Indirect, and Cumulative Impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The DEIR should address the following:

a) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian

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ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;

b) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species and identification of any mitigation measures.

c) A discussion on Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;

d) An analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and,

e) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

3) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:

a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,

b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.

Conclusion

We appreciate the opportunity to comment on the NOP for the One Beverly Hills Overlay Specific Plan Project to assist the City of Beverly Hills in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist, at Ruby.Kwan-Davis@wildlife.ca.gov.

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Sincerely,

DocuSigned by:
Erinn Wilson-Olgin
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Erinn Wilson
Environmental Program Manager I

ec: CDFW
Victoria Tang – Los Alamitos - Victoria.Tang@wildlife.ca.gov
Andrew Valand – Los Alamitos – Andrew.Valand@wildlife.ca.gov
Felicia Silva – Los Alamitos – Felicia.Silva@wildlife.ca.gov
Susan Howell – San Diego - Susan.Howell@wildlife.ca.gov
CEQA Program Coordinator – Sacramento – CEQACommentLetters@wildlife.ca.gov

State Clearinghouse - state.clearinghouse@opr.ca.gov

References:

[CDFWa] California Department of Fish and Wildlife. 2020. California Natural Diversity Database. Available from: https://wildlife.ca.gov/Data/CNDDB.

[CDFWb] California Department of Fish and Wildlife. 2020. Natural Communities. Available from: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data.

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Ollerton J., Winfree, R., and S. Tarrant. 2011. How many flowering plants are pollinated by animals. Oikos 120:321-326.

From:	OPR State Clearinghouse
To:	Kwan-Davis, Ruby@Wildlife; Masa Alkire
Cc:	Wilson-Olgin, Erinn@Wildlife; Tang, Victoria@Wildlife; Valand, Andrew@Wildlife; Silva, Felicia@Wildlife; Howell, Susan@Wildlife; OPR State Clearinghouse
Subject:	RE: CDFW Comments for One Beverly Hills Overlay Specific Plan NOP
Date:	Friday, September 25, 2020 2:47:02 PM

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Thank you for your submittal, the SCH is in receipt of your *comment.*
Note: Office of Planning and Research (OPR), State Clearinghouse (SCH) Unit is **announcing** the **discontinuance** in accepting ***hard copies*** of **environmental documents** and **notices of determinations and exemptions** starting on **November 3rd, 2020**. Email *method* of **notices of exemptions and determinations** to the state.clearinghouse@opr.ca.gov will also no longer be accepted as of that date (emailed comments will still be accepted). All agencies are required to submit online to the CEQA Database, where your CEQA notices and documents will be filed and posted.

From: Kwan-Davis, Ruby@Wildlife <Ruby.Kwan-Davis@Wildlife.ca.gov>
Sent: Friday, September 25, 2020 2:38 PM
To: malkire@beverlyhills.org
Cc: Wilson-Olgin, Erinn@Wildlife <Erinn.Wilson-Olgin@wildlife.ca.gov>; Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>; Valand, Andrew@Wildlife <Andrew.Valand@wildlife.ca.gov>; Silva, Felicia@Wildlife <Felicia.Silva@Wildlife.ca.gov>; Howell, Susan@Wildlife <Susan.Howell@wildlife.ca.gov>; OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>
Subject: CDFW Comments for One Beverly Hills Overlay Specific Plan NOP

Dear Masa Alkire,

The California Department of Fish and Wildlife has completed review of a Notice of Preparation (NOP) of a Draft Environmental Impact Report submitted by the City of Beverly Hills for the One Beverly Hills Overlay Specific Plan Project (SCH # 2020090048). Please find CDFW's comment letter attached. Thank you for the opportunity to provide comments. If you have any questions or concerns regarding CDFW's comments, please feel free to contact CDFW at your convenience.

Sincerely,
Ruby

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SENT VIA E-MAIL: October 1, 2020

malkire@beverlyhills.org
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City of Beverly Hills, Community Development Department
455 North Rexford Drive
Beverly Hills, CA 90210

Notice of Preparation of a Draft Supplemental Environmental Impact Report for the One Beverly Hills Overlay Plan Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Supplemental Environmental Impact Report (SEIR). Please send a copy of the Draft SEIR upon its completion and public release directly to South Coast AQMD as copies of the Draft SEIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website[1] as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod[2] land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds[3] and localized significance thresholds (LSTs)[4] to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

[1] South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.
[2] CalEEMod is available free of charge at: www.caleemod.com.
[3] South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf.
[4] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA ***operational*** thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment[5].

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook[1], South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan[6], and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy[7].

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC200908-02
Control Number

[5] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.
[6] South Coast AQMD's 2016 Air Quality Management Plan can be found at: http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf (starting on page 86).
[7] Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

SCAG
INNOVATING FOR A BETTER TOMORROW

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
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Los Angeles, CA 90017
T: (213) 236-1800
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October 14, 2020

Ms. Masa Alkire, AICP, Principal Planner
City of Beverly Hills Community Development Department
455 North Rexford Drive
Beverly Hills, California 90210
Phone: (310) 858-5966
E-mail: malkire@beverlyhills.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the One Beverly Hills Specific Plan [SCAG NO. IGR10256]

Dear Ms. Alkire,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the One Beverly Hills Specific Plan ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.[1]

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is also the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the One Beverly Hills Specific Plan in Los Angeles County. The proposed project includes a mixed-use development for 340 residential units, a 600-room hotel, 30 accessory spaces, 35,236 square feet (SF) of retail use, and 117,232 shared hotel/residential amenities on a 17.5 acre-site.

When available, please email environmental documentation to *IGR@scag.ca.gov* providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Ping Chang

Ping Chang
Manager, Compliance and Performance Monitoring

[1] Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE ONE BEVERLY HILLS SPECIFIC PLAN [SCAG NO. IGR10256]

CONSISTENCY WITH CONNECT SOCAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with Connect SoCal.

CONNECT SOCAL GOALS

The SCAG Regional Council fully adopted Connect SoCal in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx). The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCAL GOALS	
Goal #1:	*Encourage regional economic prosperity and global competitiveness*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*
Goal #3:	*Enhance the preservation, security, and resilience of the regional transportation system*
Goal #4:	*Increase person and goods movement and travel choices within the transportation system*
Goal #5:	*Reduce greenhouse gas emissions and improve air quality*
Goal #6:	*Support healthy and equitable communities*
Goal #7:	*Adapt to a changing climate and support an integrated regional development pattern and transportation network*
Goal #8:	*Leverage new transportation technologies and data-driven solutions that result in more efficient travel*
Goal #9:	*Encourage development of diverse housing types in areas that are supported by multiple transportation options*
Goal #10:	*Promote conservation of natural and agricultural lands and restoration of habitats*

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCAL GOALS		
	Goal	Analysis
Goal #1:	*Encourage regional economic prosperity and global competitiveness*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
Goal #2:	*Improve mobility, accessibility, reliability and travel safety for people and goods*	*Consistent: Statement as to why;* *Not-Consistent: Statement as to why;* *Or* *Not Applicable: Statement as to why;* *DEIR page number reference*
etc.		etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. To view Connect SoCal and the accompanying technical reports, please visit: https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx. Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e. transportation analysis zone (TAZ)) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the Connect SoCal Demographics and Growth Forecast Technical Report: https://www.connectsocal.org/Documents/Adopted/fConnectSoCal_Demographics-And-Growth-Forecast.pdf. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted City of Beverly Hills Forecasts			
	Year 2020	**Year 2030**	**Year 2035**	**Year 2040**	**Year 2020**	**Year 2030**	**Year 2035**	**Year 2045**
Population	19,517,731	20,821,171	21,443,006	22,503,899	34,802	35,225	35,458	35,832
Households	6,333,458	6,902,821	7,170,110	7,633,451	14,979	15,296	15,447	15,676
Employment	8,695,427	9,303,627	9,566,384	10,048,822	75,686	77,596	78,561	81,277

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG's Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see: https://www.connectsocal.org/Pages/Final-2020-PEIR.aspx; and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

RECEIVED OCT 0 6 2020

City of Beverly Hills
Notice of Preparation of an Environmental Impact Report (EIR) and Notice of Public Scoping Meeting

DATE: Monday, September 21, 2020 **TIME:** 6:30 p.m. to 8:00 p.m.

LOCATION: **VIRTUAL MEETING ON-LINE LOCATION**: https://www.gotomeet.me/CBHCD/events
Alternatively, phone access is available at 1-866-899-4679
Phone Access Code: 954-861-509

PROJECT: One Beverly Hills Overlay Specific Plan Project

The City of Beverly Hills is preparing a Draft Supplemental EIR for the proposed One Beverly Hills Overlay Specific Plan (herein referred to as "Overlay Specific Plan Project" or "Project"). The public is invited to attend a preliminary "scoping meeting" on **Monday, September 21, 2020 at 6:30 p.m.** to comment on environmental issues that should be addressed in the Draft Supplemental EIR. Due to the on-going public health issues associated with holding in-person gatherings during the Covid-19 pandemic, the scoping meeting will be held virtually. Access to the meeting is available through: (i) the video conferencing link, and (ii) the phone access information identified at the top of this notice.

Project Location: The Project Site is located in the City of Beverly Hills and is bounded on the north by Wilshire Boulevard, on the south by North Santa Monica Boulevard, on the east by the intersection of Wilshire and Santa Monica Boulevards, and on the west by the City's western boundary, which is contiguous with the Los Angeles Country Club. The site is 17.4 acres (758,064 square feet [SF]) in size and includes Assessor Parcel Numbers 4327-028-002 through -016. The Project Site is regionally accessible from Interstate 405 (the San Diego Freeway) and Santa Monica Boulevard, and locally accessible from Wilshire Boulevard. The Project Site is currently developed with the Waldorf Astoria Hotel (9850 Wilshire Boulevard), Beverly Hilton Hotel (9876 Wilshire Boulevard), a 76 service station (9988 Wilshire Boulevard), and includes the vacant former location of the Robinsons-May Department Store (9900 Wilshire Boulevard).



Project Background: The 9900 Wilshire Boulevard portion of the site has an approved entitlement for future development (9900 Wilshire Specific Plan) that allows for the construction of up to 193 condominium units and a 134-room luxury hotel. The Beverly Hilton/Waldorf Astoria site has an

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approved entitlement (Beverly Hilton Specific Plan) that allows for additional phases of development, including the future construction of 110 condominium units, a net reduction of 47 hotel rooms in comparison to conditions existing at the time the specific plan was adopted and like-for-like demolition and reconstruction of approximately 51,600 SF of retail, restaurant, meeting and office space.

The proposed Overlay Specific Plan Project is a unified development plan that encompasses the sites with the currently approved entitlements (9900 Wilshire Specific Plan and Beverly Hilton Specific Plan) as well as the parcel addressed 9988 Wilshire Boulevard, the current location of a 76 gas station (Gas Station Site). The proposed Overlay Specific Plan Project consists of two new residential buildings, a new hotel/residential building, alterations to the existing Beverly Hilton hotel, a below grade parking structure, and structures supporting project amenities and features. An elevated platform over Merv Griffin Way from the Beverly Hilton to the southwesterly property line would be the location of an 8-acre botanical garden that would include water features, seating areas, pathways, and other amenities. Approximately 4.5 acres of the botanical gardens are proposed to be publicly accessible.

Project Description: The Overlay Specific Plan Project would allow for alternative site development of the 17.4-acre Project Site than the site development authorized by the development approvals and regulations that are currently applicable to the overall project area (the approved 9900 Wilshire Specific Plan, the approved Beverly Hilton Specific Plan, and the C-3 zoning designation applicable to the Gas Station Site). The proposed Project includes the following:

- New 162 residential unit, 499,806 SF, 32-story, 410' tall residential building (Santa Monica Residences)
- New 141 residential unit, 424,266 SF, 28-story, 369' tall residential building (Garden Residences)
- New 37 residential unit and 42 hotel room, 213,966 SF, 11-story, 124' tall hotel/residential building (Wilshire Building)
- New 127,324 SF amenities and support areas structure, including 30 residential accessory spaces that could be used for staff housing (Promenade)
- Replacement 37,562 SF, 31' tall conference center for Beverly Hilton Hotel
- Replacement 72,697 SF, 20' tall hotel restaurant, retail, 36 hotel room, and support area structure (Beverly Hilton Enhancement)
- 10-acres of open space, including 8-acre botanical garden

Summary Comparison of Approved Entitlements and Proposed Overlay Specific Plan

	Currently Approved Entitlements[1]	Proposed Overlay Specific Plan	Net Change: Proposed Overlay Specific Plan – Currently Approved
Residential Uses (units [sf])	303 [1,068,676]	340 [1,024,553]	+37 [-44,123]
Hotel Uses (rooms [sf])	656 [806,403]	600 [746,323]	-56 [-60,080]
Shared hotel/residential amenities[2] (sf)	0	117,232	+117,232
Accessory Spaces (units [sf])	0 [0]	30 [10,092]	+30 [+10,092]

	Currently Approved Entitlements[1]	Proposed Overlay Specific Plan	Net Change: Proposed Overlay Specific Plan – Currently Approved
Retail Floor Area (sf)	58,357	35,236	-23,121
Total Floor Area Ratio	2.55[3]	2.55	0
Maximum Building Height	9900 Wilshire Boulevard Site: 185'-0"[4]	9900 Wilshire Boulevard Site: 410'-0"[6]	9900 Wilshire Boulevard Site: +236'-0"[7]
	Gas Station Site: 45'-0"[8]	Gas Station Site: 124'-0"[6]	Gas Station Site: +79'-0"
	Beverly Hilton Site: 200'-0[5]	Beverly Hilton Site: 124'-0"[6]	Beverly Hilton Site: -60'-0"[7]
Parking Spaces	3,323	2,179	-1,144

[1] Approved 9900 Wilshire Specific Plan and Beverly Hilton Specific Plan

[2] Shared amenity space includes the Promenade and a park pavilion building

[3] The FAR used for the gas station site (9988 Wilshire Boulevard) is the 2.0 FAR allowable under C-3 zoning

[4] Measured from +290 datum

[5] Measured from +285 datum

[6] Measured from +301 datum

[7] Height difference measures physical difference (adjusted for datum difference)

[8] Gas Station Site maximum height is the maximum height allowed under C-3 zoning

Construction is anticipated to commence in late 2021 and take approximately 50 months to complete.

Initial Study: Based on the conclusions of the Initial Study prepared for the Overlay Specific Plan Project, the following areas of potentially significant environmental impact are anticipated to require analysis in the Draft Supplemental EIR:

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance

Potential cumulative impacts and potential for growth inducement will also be addressed; alternatives, including the No Project Alternative, will be evaluated.

Purpose of the Scoping Meeting: The purpose of the scoping meeting is to present the Overlay Specific Plan Project in a public setting and provide an opportunity for a full airing of the environmental issues that are important to the community. The meeting will include a presentation of the proposal and the environmental issues to be analyzed in the Draft Supplemental EIR will be described. Following the presentation, interested agencies, organizations, and members of the public will be encouraged to present views concerning what environmental issues should be included in the Draft Supplemental EIR. The oral and written comments regarding potential environmental effects of the Overlay Specific Plan Project made during the scoping meeting will be addressed by the Draft Supplemental EIR.

30-Day Comment Period: The City invites all interested members of the public to attend the public scoping meeting. The City also invites written comments on issues related to potential environmental impacts during a 30-day comment period, which starts on ***Friday, September 4, 2020*** and will conclude on ***Monday, October 5, 2020***. Written comments should be addressed to:

Masa Alkire, AICP, Principal Planner
City of Beverly Hills Community Development Department
455 North Rexford Drive
Beverly Hills, California 90210
Fax: (310) 858-5966
Email: malkire@beverlyhills.org

After the Draft Supplemental EIR has been prepared, it will be released for public review and comment. The Planning Commission will then hold a public hearing on the Draft Supplemental EIR and on the Overlay Specific Plan Project. Separate notices of the availability of the Draft Supplemental EIR and of the hearings on the Project will be released at later dates.

The case file on this Project, which includes the plans and applications, is on file at the Planning Division, 455 North Rexford Drive, Beverly Hills, California 90210. Copies of the Initial Study are also available in the Planning Division at City Hall and online at www.beverlyhills.org/environmental. If there are any questions regarding this notice, or if you would like to review the case file (plans and applications) or receive copies of available documents, please contact **Masa Alkire, AICP, Principal Planner at (310) 285-1135 or via email at malkire@beverlyhills.org**.

Signature	September 2, 2020 Date
Masa Alkire, AICP Printed Name	Principal Planner Title

The meeting is accessible at https://www.gotomeet.me/CBHCD/events and oral comment may be provided during the meeting. Members of the public may attend this meeting telephonically at 1-866-899-4679 (access code 954-861-509) to listen to and to provide oral public comment. Written public comment can be offered electronically prior to and during the meeting by emailing malkire@beverlyhills.org. If you are an individual with a disability and need a reasonable modification or accommodation pursuant to the Americans with Disabilities Act (ADA), please contact (310) 285-1126 prior to the meeting for assistance.

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

VIA ELECTRONIC MAIL ONLY

October 5, 2020

Masa Alkire, AICP, Principal Planner
City of Beverly Hills Community Development Department
455 North Rexford Drive
Beverly Hills, California 90210
Email: malkire@beverlyhills.org

Dear Masa Alkire:

Notice of Preparation of an Environmental Impact Report (EIR)
One Beverly Hills Overlay Specific Plan

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Notice of Preparation of a Draft Supplemental EIR (SEIR) for the proposed One Beverly Hills Overlay Specific Plan (Project).

The proposed Overlay Specific Plan Project is a unified development plan that encompasses the sites with the currently approved entitlements (9900 Wilshire Specific Plan and Beverly Hilton Specific Plan) as well as the parcel addressed 9988 Wilshire Boulevard, the current location of a 76 gas station (Gas Station Site). The proposed Overlay Specific Plan Project consists of two new residential buildings, a new hotel/residential building, alterations to the existing Beverly Hilton hotel, a below grade parking structure, and structures supporting project amenities and features. An elevated platform over Merv Griffin Way from the Beverly Hilton to the southwesterly property line would be the location of an 8-acre botanical garden that would include water features, seating areas, pathways, and other amenities. Approximately 4.5 acres of the botanical gardens are proposed to be publicly accessible. Construction is anticipated to commence in late 2021 and take approximately 50 months to complete.

Metropolitan is composed of 26 member public agencies charged with providing a reliable supply of high quality drinking water to approximately 19 million people in six counties in Southern California. Metropolitan reviews the consistency of local plans, projects, and programs for any potential effects on Metropolitan's facilities, rights-of-way, projects, programs, activities, and planning efforts. Information provided by these reviews is intended to encourage local agencies and project sponsors to take actions that aid and sustain Metropolitan's water policies and programs, including conservation, recycling, and reclamation.

The proposed Project is located in the City of Beverly Hills and is bounded on the north by Wilshire Boulevard, on the south by North Santa Monica Boulevard, on the east by the

intersection of Wilshire and Santa Monica Boulevards, and on the west by the City's western boundary, which is contiguous with the Los Angeles Country Club. The site is 17.4 acres (758,064 square feet) in size and includes Assessor Parcel Numbers 4327-028-002 through -016. The Project Site is regionally accessible from Interstate 405 (the San Diego Freeway) and Santa Monica Boulevard, and locally accessible from Wilshire Boulevard. The Project Site is currently developed with the Waldorf Astoria Hotel (9850 Wilshire Boulevard), Beverly Hilton Hotel (9876 Wilshire Boulevard), a 76 service station (9988 Wilshire Boulevard), and includes the vacant former location of the Robinsons-May Department Store (9900 Wilshire Boulevard).

As a part of the Project, the project applicant proposes to move a section of the Santa Monica pipeline that currently lies under Merv Griffin Drive to the western boundary of the Project area. The proposed location of this pipeline is at least 25 feet (more than 35 feet for most of the realignment) from the southwesterly property line/golf course (email from KPFF Consulting Engineers on 9/9/2020). Further, a storm drain line currently exists along the property line and west of the proposed Metropolitan line route. Metropolitan requests that the City of Beverly Hills and the project proponent work closely with Metropolitan to ensure impacts to the Santa Monica feeder do not disrupt service to customers, nor affect water quality within the pipeline.

Metropolitan anticipates entering into a relocation agreement with the project applicant, requiring a future discretionary approval. Therefore, the SEIR should identify and acknowledge Metropolitan is a responsible agency that may rely on the SEIR in its decision-making per CEQA Guidelines Section 15124(d)(1)(A).

Metropolitan must be allowed to maintain its rights-of-way and access to its facilities and properties at all times, in order to repair and maintain the current condition of those facilities. In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Metropolitan will not permit procedures that could subject the pipes to excessive vehicle, impact or vibratory loads. Any future design plans associated with this Project should be submitted to the attention of Metropolitan's Substructures Team. Approval of the Project should be contingent on Metropolitan's approval of design plans for portions of the proposed Project that could impact its facilities.

Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by contacting Metropolitan's Substructures Team at EngineeringSubstructures@mwdh2o.com. To assist in preparing plans that are compatible with Metropolitan's facilities and rights-of-way, enclosed is a copy of the *Guidelines for Improvements and Construction Projects Proposed in the Area of Metropolitan's Facilities and Rights-of-Way* (July 2018)(attached) Please note that Metropolitan's facilities and rights-of-way must be fully shown and identified as Metropolitan's on all designs or plans submitted.

Appropriate property rights must be obtained from Metropolitan for any project activities within Metropolitan's property, such as the granting of a road easement or license. The granting of property rights may be subject to Metropolitan's Board of Director's discretionary approval. No work must be done, including potholing or any studies within Metropolitan's property prior to the execution of an appropriate agreement. Please contact Metropolitan's Real Property Group regarding the process for obtaining access or property rights at RealEstateServices@mwdh2o.com.

We are concerned with water conservation and encourage projects to include water conservation measures. Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed project.

We appreciate the opportunity to provide input to your planning process and look forward to future coordination for this project. If we can be of further assistance, please contact Ellen Mackey at (213) 217-6127.

Very truly yours,

Sean Carlson
Team Manager, Environmental Planning Section

EM/em

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

October 5, 2020

Masa Alkire, AICP
City of Beverly Hills
Community Development Department
455 North Rexford Drive
Beverly Hills, CA 90210
Sent by Email: malkire@beverlyhills.org

RE: One Beverly Hills Overlay Specific Plan Project
9850 Wilshire Boulevard, 9876 Wilshire Boulevard, 9988 Wilshire Boulevard, 9900 Wilshire Boulevard
Notice of Preparation of Environmental Impact Report (EIR)

Dear Masa Alkire:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed One Beverly Hills Overlay Specific Plan Project (Project) located at 9850 Wilshire Boulevard (Blvd.), 9876 Wilshire Blvd., 9988 Wilshire Blvd., and 9900 Wilshire Blvd. in the City of Beverly Hills (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on Metro Bus facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures and project design features. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.[1]

In addition to the specific comments outlined below, Metro is providing the City and Applicant with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at www.metro.net/projects/devreview/.

Project Description
The Project includes two new residential buildings, a new hotel and residential building, alterations to the existing Beverly Hilton Hotel, a below-grade parking structure, and structures supporting project amenities and features.

[1] See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Recommendations for EIR Scope and Content

Bus Service Adjacency

1. Service: Metro Bus Lines 20, 720, 4 and 704 operate on Wilshire Blvd. and Santa Monica Blvd., adjacent to the Project. A total of three Metro bus stops are located adjacent to the Project site. Two stops servicing Lines 20 and 720 traveling eastbound: one is located at Wilshire Blvd. and Whittier Drive, and another is located at the southwest corner of Wilshire Blvd. and Santa Monica Blvd. One stop servicing Lines 4 and 704 traveling southwest are located at the southwest corner of Santa Monica Blvd. and Wilshire Blvd. Other transit operators such as Antelope Valley Transit Authority (AVTA) may provide service in the vicinity of the Project and should be consulted.

2. Impact Analysis: The EIR should analyze potential effects on Metro Bus services and identify mitigation measures or project design features as appropriate. Potential impacts may include impacts to transportation services, stops, and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:

    a. Bus Stop Condition: During construction, the Applicant may either maintain the stops in its current condition and location, or temporarily relocate the stops consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Applicant must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.

    b. Bus Operations Coordination: The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

    c. Driveways: Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.

    d. Bus Stop Enhancements: Metro encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. These include benches, bus shelters, wayfinding signage, enhanced crosswalks and ADA-compliant ramps, pedestrian lighting, and shade trees in paths of travel to bus stops. The City should consider requesting the installation of such amenities as part of the Project.

Transit Supportive Planning: Recommendations and Resources

Considering the Project's proximity to a major transfer point for Metro Bus lines 4, 704, 20, and 720, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at: https://www.metro.net/projects/tod-toolkit.

2. Land Use: Metro supports development of commercial and residential properties near transit bus stops and understands that increasing development near bus stops represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Applicant to be mindful of the Project's proximity to Metro bus stops 4, 704, 20, and 720, including orienting pedestrian pathways towards the bus stops.

3. Transit Connections and Access: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The Project design should consider and accommodate transfer activity between bus lines that will occur along the sidewalks and public spaces. Metro has completed the Metro Transfers Design Guide, a best practices document on transit improvements. This can be accessed online at https://www.metro.net/projects/systemwidedesign.

4. Bicycle Use: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed.

5. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf.

6. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

7. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

8. Transit Pass Programs: Metro would like to inform the Applicant of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at https://www.metro.net/riding/eapp/.

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address: Metro Development Review, One Gateway Plaza, MS 99-22-1, Los Angeles, CA 90012-2952.

Sincerely,

Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: https://www.metro.net/projects/devreview/

Los Angeles County
Metropolitan Transportation Authority

METRO ADJACENT DEVELOPMENT HANDBOOK

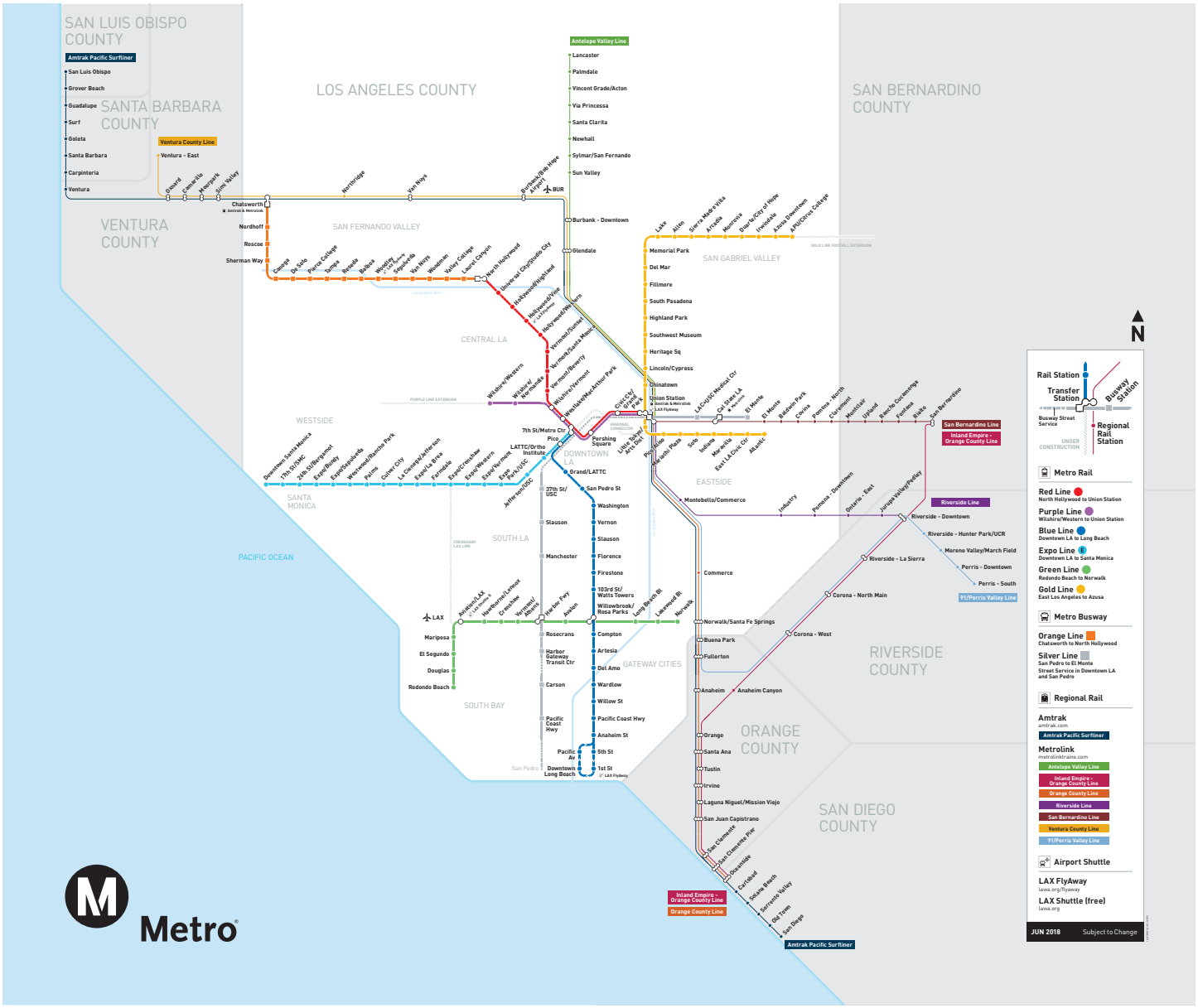
A GUIDE FOR CITIES AND DEVELOPERS

JANUARY 2020



Metro

Metro and Regional Rail Map



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing transit network presents new opportunities to catalyze land use investment and shape livable communities.

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Quick Overview

Purpose of Handbook

The Metro Adjacent Development Handbook (Handbook) is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services.

Overarching Goal
By providing information and encouraging early coordination, Metro seeks to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit.

Intended Audience
The Handbook is a resource for multiple stakeholder groups engaged in the development process, including:

- Local jurisdictions who review, entitle, and permit development projects,
- Developers,
- Property owners,
- Architects, engineers, and other technical consultants,
- Builders/contractors,
- Utility companies, and
- other Third Parties.

Handbook Content
The Handbook includes:

- **Introduction** of Metro's Development Review coordination process, common concerns, and typical stages of review.
- **Information** on best practices during three key coordination phases to avoid potential conflicts or create compatibility with the Metro transit system:
  - Planning & Conceptual Design,
  - Engineering & Technical Review, and
  - Construction Safety & Monitoring.
- **Glossary** with definitions for key terms used throughout the Handbook.

RULE OF THUMB: 100 FEET

Metro's Development Review process applies to projects that are within 100 feet of Metro transit facilities.

While the Handbook summarizes key concerns and best practices for adjacency conditions, it does not replace Metro's technical requirements and standards.

Prior to receiving approval for any construction activities adjacent to, above, or below Metro facilities, Third Parties must comply with the Metro Adjacent Construction Design Manual, available on Metro's website.

Contact Us
For questions, contact the Development Review Team:

- Email: devreview@metro.net
- Phone: 213.418.3484

Additional Information & Resources

- Metro Development & Construction Coordination website: https://www.metro.net/devreview
- Metro GIS/KML ROW Files: https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data
- Metrolink Standards and Procedures: https://www.metrolinktrains.com/about/agency/engineering--construction

Metro will continue to revise the Handbook, as needed, to reflect updates to best practices in safety, operations, and transit-supportive development.

Background

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail, bus, and other mobility services (e.g. bikeshare, microtransit) throughout Los Angeles County (LA County). On average, Metro moves 1.3 million people each day on buses and trains. With funding from the passage of Measure R (2008) and Measure M (2016), the Metro system is expanding. Over the next 40 years, Metro will build over 60 new stations and over 100 miles of transit right-of-way (ROW). New and expanded transit lines will improve mobility across LA County, connecting riders to more destinations and expanding opportunities for development that supports transit ridership. Metro facilities include:



Metro Rail: Metro operates heavy rail (HRT) and light rail (LRT) transit lines in underground tunnels, along streets, off-street in dedicated ROW, and above street level on elevated structures. Heavy rail trains are powered by a "third rail" along the tracks. Light rail vehicles are powered by overhead catenary systems (OCS). To support rail operations, Metro owns and maintains traction power substations (TPSS), maintenance yards, and other infrastructure.



Metrolink/Regional Rail: Metro owns a majority of the ROW within LA County on which the Southern California Regional Rail Authority (SCRRA) operates Metrolink service. Metrolink is a commuter rail system with seven lines that span 388 miles across five counties, including: Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metro-owned ROW on which Metrolink operates, and coordinates with Metrolink on any comments or concerns. Metrolink has its own set of standards and processes, see link on page 1.



Metro Bus Rapid Transit (BRT): Metro operates accelerated bus transit, which acts as a hybrid between rail and traditional bus service. Metro BRT may operate in a dedicated travel lane within a street or freeway, or off-street along dedicated ROW. Metro BRT stations may be located on sidewalks within the public right-of-way, along a median in the center of streets, or off-street on Metro-owned property.



Metro Bus: Metro operates 170 bus lines across more than 1,400 square miles in LA County. The fleet serves over 15,000 bus stops with approximately 2,000 buses. Metro operates "Local" and "Rapid" bus service within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions.

Why is Metro interested in adjacent development?

Metro Supports Transit Oriented Communities: Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout LA County. Metro seeks to partner with local, state, and federal jurisdictions, developers, property owners and other stakeholders across LA County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Adjacent Development Leads to Transit Oriented Communities: Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to:

- reduce auto dependency,
- reduce greenhouse gas emissions,
- promote walkable and bikeable communities that accommodate more healthy and active lifestyles,
- improve access to jobs and economic opportunities, and
- create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Opportunity: Acknowledging an unprecedented opportunity to influence how the built environment develops along and around transit and its facilities, Metro has created this document. The Handbook helps ensure compatibility between private development and Metro's transit infrastructure to minimize operational, safety, and maintenance issues. It serves as a crucial first step to encourage early and active collaboration with local stakeholders and identify potential partnerships that leverage Metro initiatives and support TOCs across LA County.



Metro Purview & Concerns

Metro Purview for Review & Coordination

Metro is interested in reviewing development, construction, and utility projects within 100 feet of Metro transit facilities, real estate assets, and ROW – as measured from the edge of the ROW outward – both to ensure the structural safety of existing or planned transit infrastructure and to maximize integration opportunities with adjacent development. The Handbook seeks to:

- Improve communication and coordination between developers, jurisdictions, and Metro.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for riders and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Streamline the review process to be transparent, clear, and efficient.
- Assist in the creation of overall marketable and desirable developments.

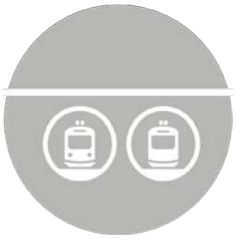
Key Audiences for Handbook

The Handbook is intended to be used by:

- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility,
- Developers, property owners,
- Architects, engineers, design consultants,
- Builders/contractors,
- Entitlement consultants,
- Environmental consultants,
- Utility companies, and
- other Third Parties.

Metro Assets & Common Concerns for Adjacent Development

The table on the facing page outlines common concerns for development projects and/or construction activities adjacent to Metro transit facilities and assets. These concerns are discussed in greater detail in the following chapters of the Handbook.

METRO ASSETS	COMMON ADJACENCY CONCERNS
 **UNDERGROUND ROW** Transit operates below ground in tunnels.	• Excavation near tunnels and infrastructure • Clearance from support structures (e.g. tiebacks, shoring, etc) • Coordination with utilities • Clearance from ventilation shafts, surface penetrations (e.g. emergency exits) • Surcharge loading of adjacent construction • Explosions • Noise and vibration/ground movement • Storm water drainage
 **AERIAL ROW** Transit operates on elevated guideway, typically supported by columns.	• Excavation near columns and support structures • Column foundations • Clearance from OCS • Overhead protection and crane swings • Setbacks from property line for maintenance activities to occur without entering ROW • Coordination with utilities • Noise reduction (e.g. double-paned windows)
 **AT-GRADE ROW** Transit operates in dedicated ROW at street level; in some cases tracks are separated from adjacent property by fence or wall.	• Pedestrian and bicycle movements and safety • Operator site distance/cone of visibility • Clearance from OCS • Crane swings and overhead protection • Trackbed stability • Storm water drainage • Noise/vibration • Driveways near rail crossings • Setbacks from property line for maintenance activities to occur without entering ROW • Utility coordination
 **BUS STOPS** Metro operates bus service on city streets. Bus stops are located on public sidewalks.	• Lane closures and re-routing service during construction • Temporary relocation of bus stops • Impacts to access to bus stops
 **NON-REVENUE/OPERATIONAL** Metro owns and maintains property to support operations (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride parking lots).	• Excavation and clearance from support structures (e.g. tiebacks, shoring, etc) • Ground movement • Drainage • Utility coordination • Access to property

Metro Coordination Process

Typical Stages of Metro Review and Coordination

Early coordination helps avoid conflicts between construction activities and transit operations and maximizes opportunities to identify synergies between the development project and Metro transit services that are mutually beneficial.



Coordination Goal: Metro encourages developers to consult with the Development Review Team early in the design process to ensure compatibility with transit infrastructure and minimize operational, safety, and maintenance issues with adjacent development. The Development Review team will serve as a case manager to developers and other Third Parties to facilitate the review of plans and construction documents across key Metro departments.

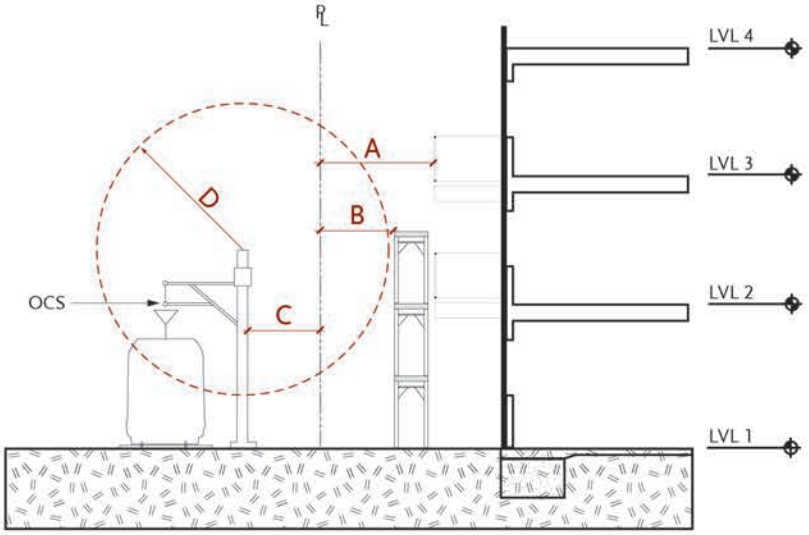
Level of Review: Not all adjacent projects will require significant review and coordination with Metro. The level of review depends on the Project's proximity to Metro, adjacency conditions, and the potential to impact Metro facilities and/or services. For example, development projects that are excavating near Metro ROW or using cranes near transit facilities require a greater level of review and coordination. Where technical review and construction monitoring is needed, Metro charges fees for staff time, as indicated by asterisk in the above diagram.

Permit Clearance: Within the City of Los Angeles, Metro reviews and clears Building & Safety permits for projects within 100 feet of Metro ROW, pursuant to Zoning Information 1117. To ensure timely clearance of these permits, Metro encourages early coordination as noted above.

To begin consultation, submit project information via an online In-Take Form, found on Metro's website. Metro staff will review project information and drawings to screen the project for any potential impacts to transit facilities or services, and determine if require further review and coordination is required. The sample sections on the facing page illustrate adjacency condition information that helps Metro complete project screening.

Contact:
Metro Development Review Team
Website: https://www.metro.net/devreview
Email: devreview@metro.net
Phone: 213.418.3484

Sample Section: Adjacency Conditions



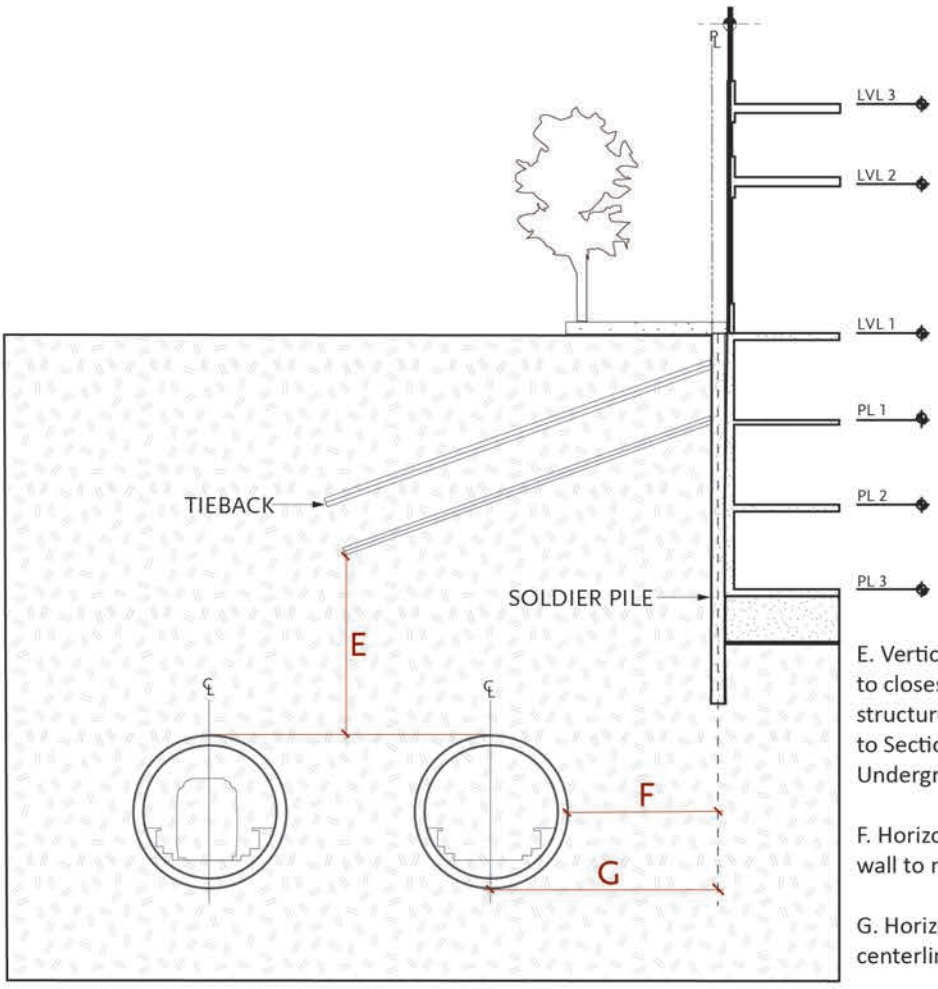
AT-GRADE CONDITION

A. Distance from property line to nearest permanent structure (e.g. building facade, balconies, terraces). Refer to Section 1.3 Building Setback of Handbook.

B. Distance from property line to nearest temporary construction structures (e.g. scaffolding).

C. Distance from property line to nearest Metro facility.

D. Clearance from nearest temporary and/or permanent structure to Overhead Catenary System (OCS). Refer to Section 1.4, OCS Clearance of Handbook.



BELOW-GRADE CONDITION

E. Vertical distance from top of Metro tunnel to closest temporary and/or permanent structure (e.g. tiebacks, foundation). Refer to Section 2.2, Proximity to Tunnels & Underground Infrastructure of Handbook.

F. Horizontal distance from exterior tunnel wall to nearest structure.

G. Horizontal distance from Metro track centerline to nearest structure.

Best Practices

Best Practices for Developer Coordination

Metro encourages developers of projects adjacent to Metro ROW and/or Real Estate Assets to take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies:** The Metro Development & Construction Coordination website and Handbook provide important information for those interested in constructing on, adjacent, over, or under Metro ROW, non-revenue property, or transit facilities. Developers and other Third Parties should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.

2. **Contact Metro early during design process:** Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval. Metro encourages project submittal through the online In-Take Form to begin consultation.

3. **Maintain communication:** Frequent communication with Metro during project design and construction will reinforce relationships and allow for timely project completion.

Best Practices for Local Jurisdiction Notification

To improve communication between Metro and the development community, Metro suggests that local jurisdictions take the following steps to notify property owners of coordination needs for properties adjacent to Metro ROW by:

- **Updating GIS and parcel data:** Integrate Metro ROW files into the City/County GIS and/or Google Earth Files for key departments (e.g. Planning, Public Works, Building & Safety) to notify staff of Metro adjacency and need for coordination during development approval process.

- **Flag Parcels:** Create an overlay zone as part of local Specific Plan(s) and/or Zoning Ordinance(s) to tag parcels that are within 100 feet Metro ROW and require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZI-1117)].

- **Provide Resources:** Direct all property owners and developers interested in parcels within 100 feet of Metro ROW to Metro's resources (e.g. website, Handbook).


Metro
Downtown
Santa
Monica
E



Site Plan & Conceptual Design

Site Plan & Conceptual Design

1.1 Supporting Transit Oriented Communities

Transit-oriented communities (TOCs) are places that, by their design, make it more convenient to take transit, walk, bike or roll than to drive. By working closely with the development community and local jurisdictions, Metro seeks to ensure safe construction near Metro facilities and improve compatibility with adjacent development to increase transit ridership.

RECOMMENDATION: Consider site planning and building design strategies to that support transit ridership, such as:

- Leveraging planning policies and development incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Programming a mix of uses to create lively, vibrant places that are active day and night.
- Utilizing Metro policies and programs that support a healthy, sustainable, and welcoming environment around transit service and facilities.
- Prioritizing pedestrian-scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Activating ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Reducing and screening parking to focus on pedestrian activity.
- Incorporating environmental design elements that help reduce crime (e.g. windows and doors that face public spaces, lighting).



The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. This project accommodates portal access into the Metro Rail system and on-street bus facilities.

1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multi-modal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit riders as well as users of the developments.

RECOMMENDATION: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel safe, intuitive, and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.



The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Downtown Santa Monica Station. Photo by PWP Landscape Architecture

1.3 Building Setback

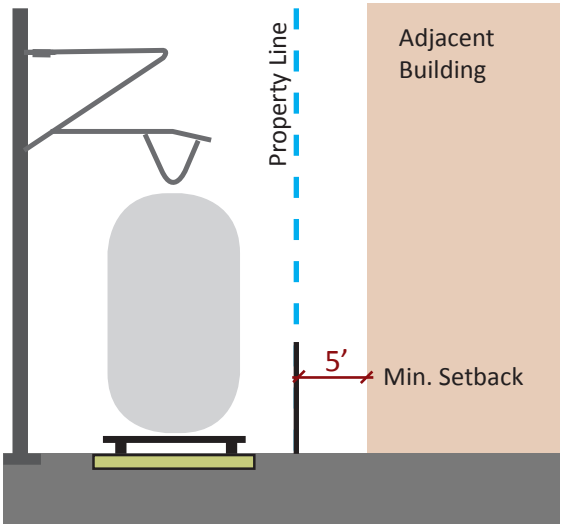
Buildings and structures with a zero lot setback that closely abut Metro ROW can pose concerns to Metro during construction. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

RECOMMENDATION: Include a minimum setback of five (5) feet from the property line to building facade to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro Right of Entry Permit must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Coordination between property owners of fences, walls, and other barriers along property line is recommended. See Section 1.5.

Refer to Section 3.2 – Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



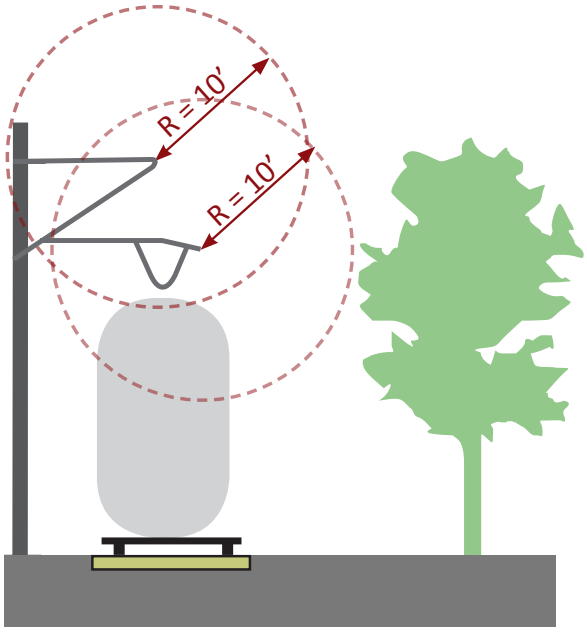
A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged to allow project construction and ongoing maintenance without encroaching on Metro property.

1.4 Overhead Catenary System (OCS) Clearance

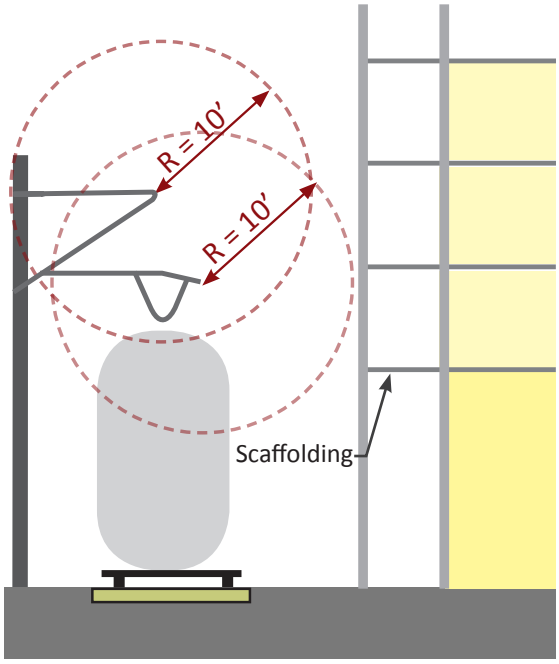
Landscaping and tree canopies can grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains. Building appurtenances facing rail ROW, such as balconies, may also pose safety concerns to Metro operations as objects could fall onto the OCS.

RECOMMENDATION: Design project elements facing the ROW to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Plan for landscape maintenance from private property and prevent growth into Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide building users direct access to Metro ROW.
- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures. If Transmission Power (TP) feeder cable is present, twenty (20) feet from the OCS and support structures is required. Different standards will apply for Metro Trolley Wires, Feeder Cables (wires) and Span Wires.



Adjacent structures and landscaping should be sited and maintained to avoid conflicts with the rail OCS.



Scaffolding and construction equipment should be staged to avoid conflicts with the rail OCS.

1.5 Shared Barrier Construction & Maintenance

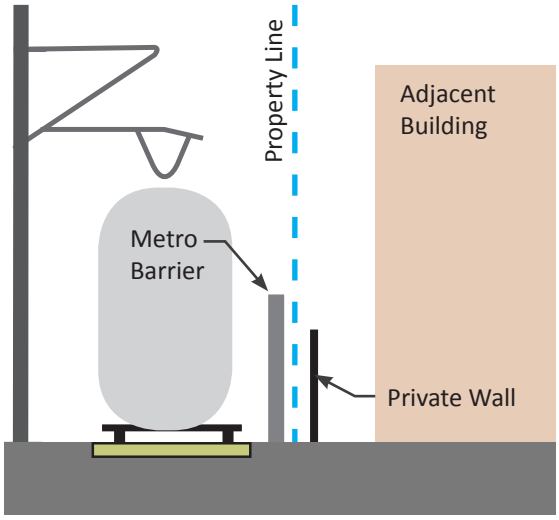
In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

RECOMMENDATION: Coordinate with Metro Real Estate to create a single barrier condition along the ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout LA County, Metro recommends the following, in order of preference:

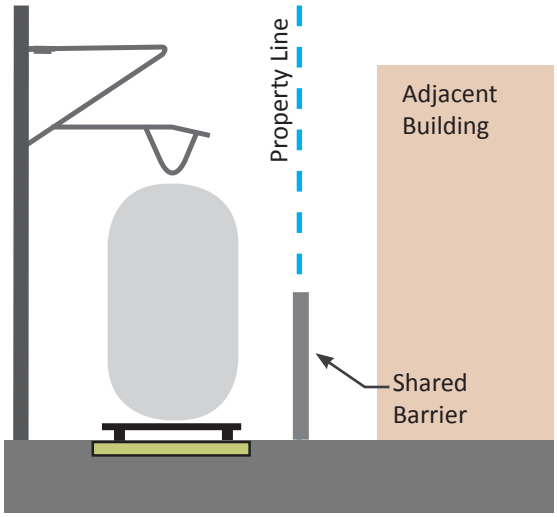
- **Enhance existing Metro barrier:** if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.

- **Replace existing barrier(s):** if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single "shared" barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.

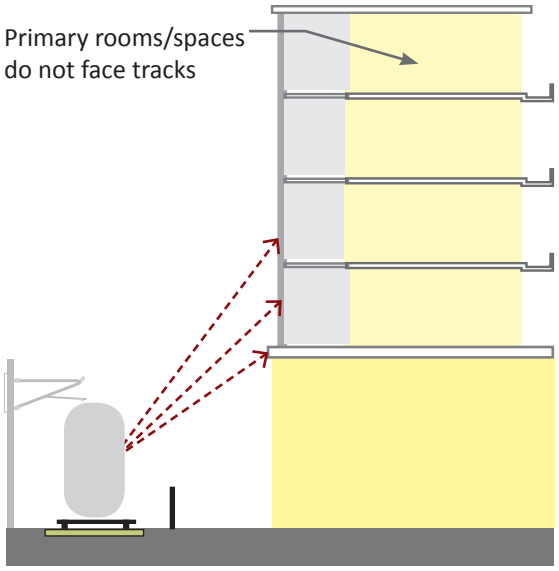
1.6 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, which can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

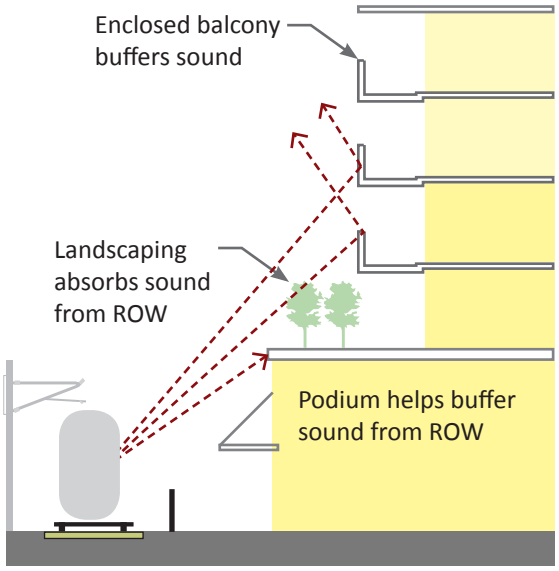
RECOMMENDATION: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate secondary or "back of house" rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than primary living spaces that are noise sensitive (e.g. bedrooms and family rooms).
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease or sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded Noise Easement Deed in favor of Metro may be required for projects within 100 feet of Metro ROW to ensure notification to tenants and owners of any proximity issues.



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.

1.7 At-Grade Rail Crossings

New development is likely to increase pedestrian activity at rail crossings. Safety enhancements may be needed to upgrade existing rail crossings to better protect pedestrians.

RECOMMENDATION: Coordinate with Metro, the California Public Utilities Commission (CPUC), and any other transit operators using the crossing (e.g. Metrolink) to determine if safety enhancements are needed for nearby rail crossings.

While Metro owns and operates the rail ROW, the CPUC regulates all rail crossings. Contact the CPUC early in the design process to determine if they will require any upgrades to existing rail crossings. The CPUC may request to review development plans and hold a site visit to understand future pedestrian activity. Metro's Corporate Safety Department can support the developer in coordination with the CPUC.



Gates and pedestrian arms are common types of safety elements for pedestrians at rail crossings.

1.8 Sight-lines at Crossings

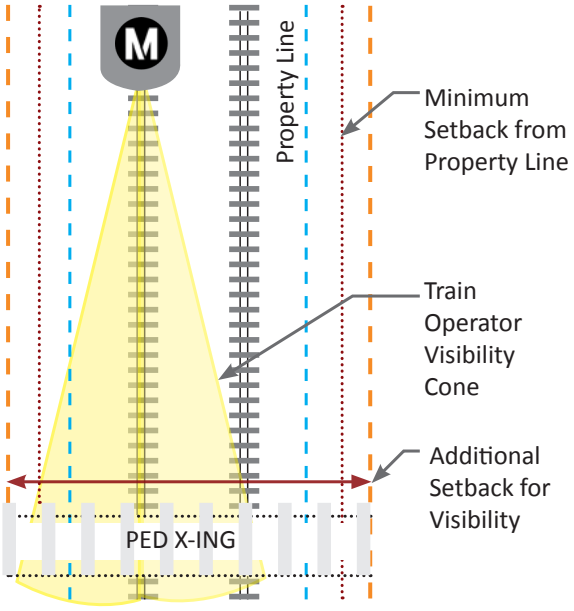
Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sight-lines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases efficiency of transit service.

RECOMMENDATION: Design buildings to maximize transit service sight-lines at crossings, leaving a clear cone of visibility to oncoming vehicles and pedestrians.

Metro Rail Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be necessary to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sight-lines for trains approaching street crossings create unsafe conditions.



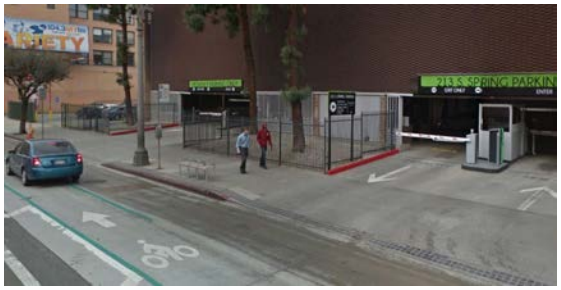
Visibility cones allow train operators to respond to safety hazards.

1.9 Driveway/Access Management

Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking lots and loading zones at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity to fast moving trains and buses, which pose safety concerns.

RECOMMENDATION: Site driveways and other vehicular entrances to avoid conflicts with pedestrians, bicycles, and transit vehicles by:

- Placing driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active ROW, transit vehicles, and people, as well as queuing on streets.
- Locating vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Placing loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidating vehicular entrances and reduce width of driveways.
- Using speed tables to slow entering/exiting automobiles near pedestrians.
- Separating pedestrian walkways to minimize conflict with vehicles.
- Encouraging safe non-motorized travel.



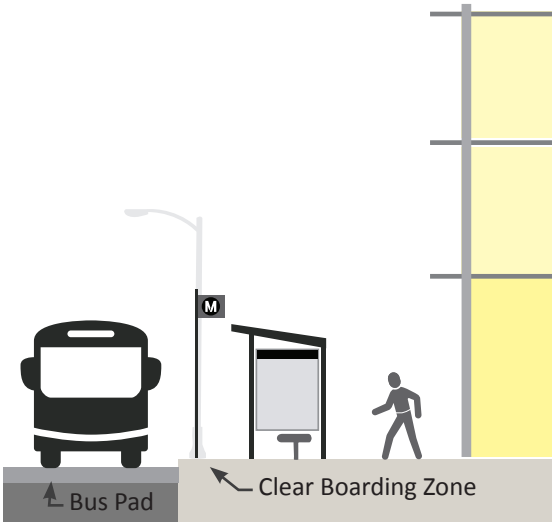
Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.

1.10 Bus Stop & Zones Design

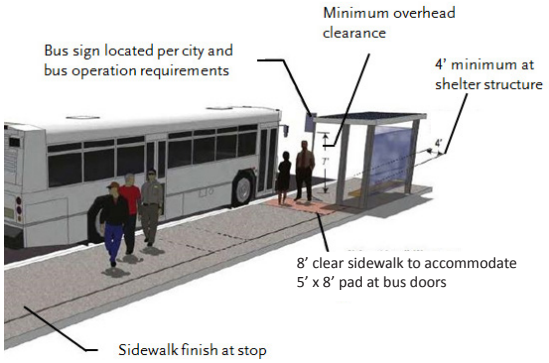
Metro Bus serves over 15,000 bus stops throughout the diverse landscape that is LA County. Typically located on sidewalks within public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdictions to create a vibrant public realm around new developments by strengthening multi-modal access to/ from Metro transit stops and enhancing the pedestrian experience.

RECOMMENDATION: When designing around existing or proposed bus stops:

- Review Metro's Transit Service Policy, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops.
- Review Metro's Transfers Design Guide for more information at https://www.metro.net/projects/station-design-projects/
- Accommodate 5' x 8' landing pads at bus doors (front and back door, which are typically 23 to 25 feet apart).
- Locate streetscape elements (e.g. tree planters, street lamps, benches, shelters, trash receptacles and newspaper stands) outside of bus door zones to protect transit access and ensure a clear path of travel.
- Install a concrete bus pad within each bus stop zone to avoid street asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15' preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Consider tree species, height, and canopy shape (higher than 14' preferred) to avoid vehicle conflicts at bus stops. Trees should be set back from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity. Avoid planting of trees that have an invasive and shallow root system.



A concrete bus pad should be located at bus stops and bus shelters should be located along sidewalks to ensure an accessible path of travel to a clear boarding area.



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.


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Engineering & Technical Review

Engineering & Technical Review

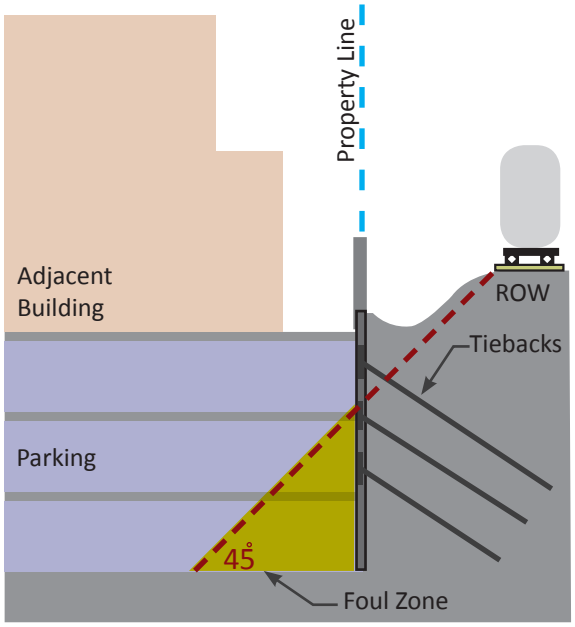
2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize support of existing Metro infrastructure. Any excavation which occurs within the geotechnical foul zone relative to Metro infrastructure is subject to Metro review and approval and meet Cal/OSHA requirements. This foul zone or geotechnical zone of influence shall be defined as the area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and requires additional Metro Engineering review.

RECOMMENDATION: Coordinate with Metro Engineering staff for review and approval of the excavation support system drawings and calculations prior to the start of excavation or construction. Tiebacks encroaching into Metro ROW may require a tieback easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW will require compliance with SCRRA Engineering standards and guidelines.

See page 7 for a sample section showing Metro adjacent conditions.



An underground structure located within the ROW foul zone would require additional review by Metro.

2.2 Proximity to Tunnels & Underground Infrastructure

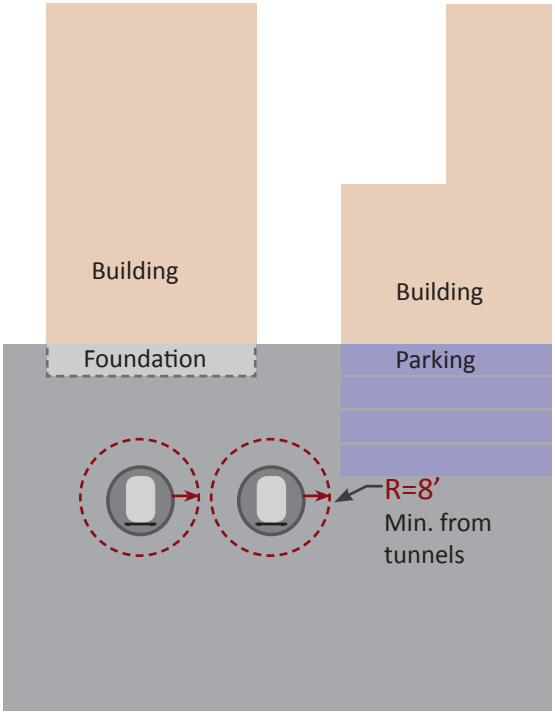
Construction adjacent to, over, or below underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

RECOMMENDATION: Coordinate with Metro early in the design process when proposing to build near underground Metro infrastructure. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro's satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety, or continued efficient operation of Metro facilities.

Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. See Section 3.4, Excavation Drilling/Monitoring for additional information regarding monitoring requirements.

See page 7 for a sample section showing Metro adjacent conditions.

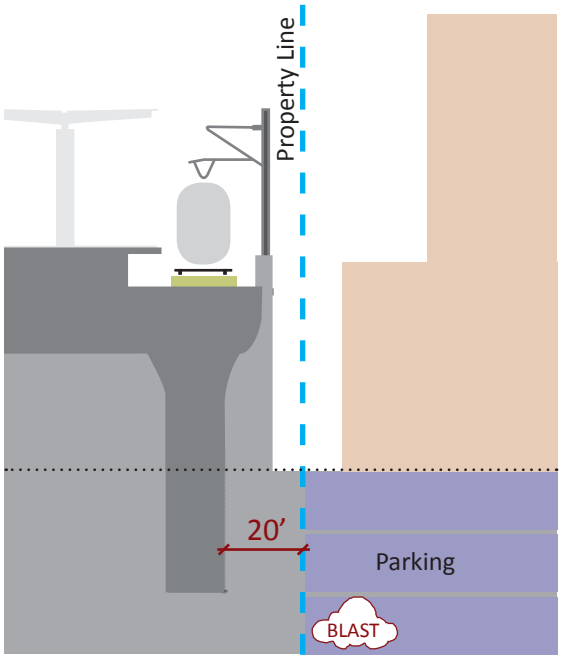


Adjacent project structures in close proximity to underground Metro infrastructure will require additional review by Metro.

2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at-grade locations, situated below elevated guideways or near stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

RECOMMENDATION: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments within this 20-foot envelope may be required to submit a Threat Assessment and Blast/Explosion Study for Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a Threat Assessment and Blast/Explosion Study.

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Construction Safety & Management

Construction Safety & Management

3.1 Pre-Construction Coordination

Metro is concerned with impacts to service requiring rail single line tracking, line closures, speed restrictions, and bus bridging occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe transit operations and passenger well-being.

RECOMMENDATION: Following an initial screening of the project, Metro may determine that additional on-site coordination may be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of transit service shutdown per contingency plan.
- Designate a ROW observer or other safety personnel and an inspector from the project's construction team.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts to Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a Construction Monitoring fee may be assessed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRA Engineering Standards and Guidelines.





Metro may need to monitor development construction near Metro facilities.

3.2 Track Access and Safety

Permission from Metro is required to enter Metro property for rail construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

RECOMMENDATION: Obtain and/or complete the following to work in or adjacent to Metro Rail ROW:

1. **Construction Work Plan:** Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and riders.

2. **Safety Training:** All members of the project construction team will be required to attend Metro Rail Safety Training before commencing work activity. Training provides resources and procedures when working near active rail ROW.

3. **Right of Entry Permit/Temporary Construction Easement:** All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.

4. **Track Allocation:** All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity. If adjacent construction is planned in close proximity to active ROW, flaggers must be used to ensure safety of construction workers and transit riders.



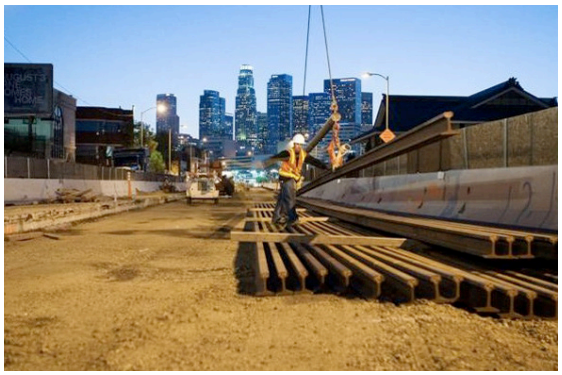
Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

3.3 Construction Hours

Building near active Metro ROW poses safety concerns and may require limiting hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service. To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance.

RECOMMENDATION: In addition to receiving necessary construction approvals from the local jurisdiction, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction with potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1am-4am) or during non-peak hours to minimize impacts to service. The developer may be responsible for additional operating costs resulting from disruption to normal Metro service.





Construction during approved hours ensures the steady progress of adjacent development construction and minimizes impacts to Metro's transit service.

3.4 Excavation/Drilling Monitoring

Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro's transit infrastructure.

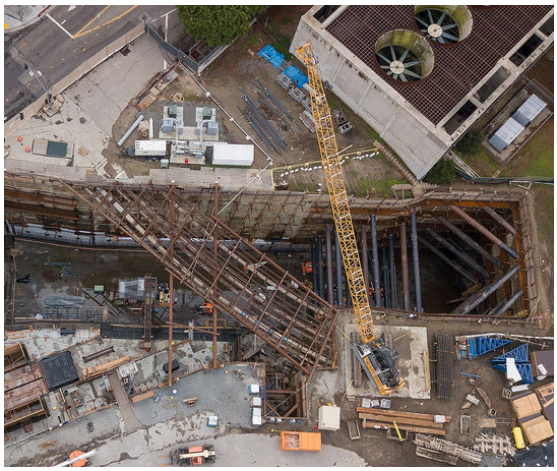
RECOMMENDATION: Coordinate with Metro Engineering to review and approve excavation and shoring plans during design and development, and well in advance of construction (see Sections 2.1 and 2.2).

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro's geotechnical zone of influence, where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring



Excavation and shoring plans must be reviewed by Metro to ensure structural compatibility with Metro infrastructure and safety during adjacent development construction.



A soldier pile wall used for Regional Connector station at 2nd/Hope.

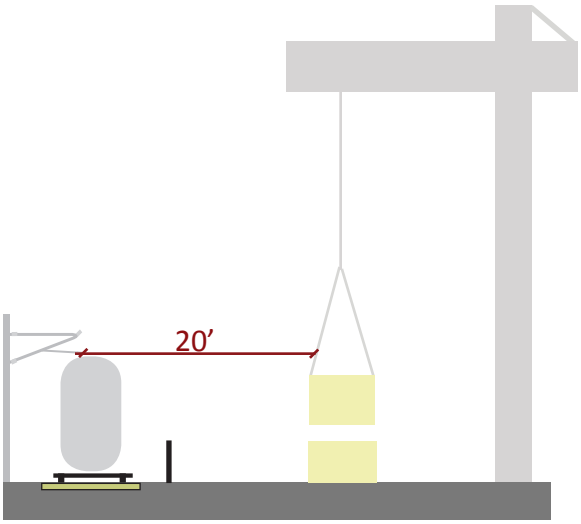
3.5 Crane Operations

Construction activities adjacent to Metro ROW will often require moving large, heavy loads of building materials and machinery by crane. Cranes referred to in this section include all power operated equipment that can hoist, lower, and horizontally move a suspended load. There are significant safety issues to be considered for the operators of crane devices as well as Metro riders and operators.

RECOMMENDATION: Per California Occupational Safety and Health Administration (Cal/OSHA) standards, cranes shall maintain a 20 foot clearance from Metro OCS used to power light rail lines. In the event that a crane or its load needs to enter the 20-foot envelope, OCS lines must be de-energized. De-energizing the Metro OCS is strongly discouraged.

Construction activities which involve swinging a crane and suspended loads over Metro facilities or bus passenger areas shall not be performed during revenue hours. The placement and swing of this equipment are subject to Metro review of a construction work plan request.

Project teams will bear all costs associated with impacts to Metro Rail operations and maintenance.



Cranes and construction equipment should be staged to avoid conflicts with the rail OCS.

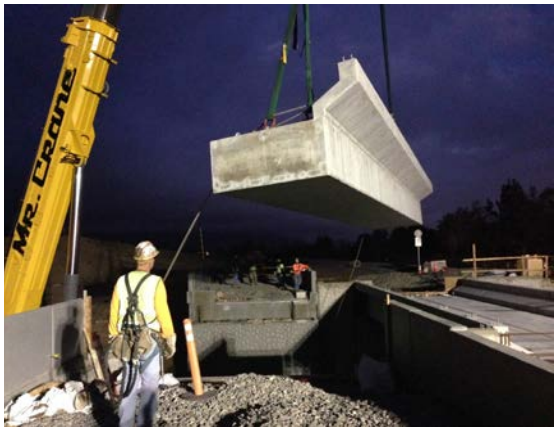


Construction adjacent to the active ROW may require ongoing coordination with Metro.

3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities and pose a safety concern to the riders accessing them.

RECOMMENDATION: Erect vertical construction barriers and overhead protection compliant with Metro and Cal/OSHA requirements to prevent objects from falling into Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



Overhead protection is required when moving heavy objects over Metro ROW or in areas designated for public use.

3.7 Pedestrian & Emergency Access

Metro's riders rely on the consistency and reliability of access and wayfinding to and from stations, stops, and facilities. Construction on adjacent property must not obstruct pedestrian access, fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, riders, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained at all times.

RECOMMENDATION: Ensure pedestrian and emergency access from Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices (MUTCD) and in coordination with Metro Art and Design Standards.
- Emergency exits shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.



Sidewalk access is blocked for a construction project, forcing pedestrians into the street or to use less direct paths to the Metro facility.

3.8 Impacts to Bus Routes & Stops

During construction, bus stop zones and routes may need to be temporarily relocated. Metro needs to be informed of activities that require stop relocation or route adjustments in order to ensure uninterrupted service.

RECOMMENDATION: During construction, maintain or relocate existing bus stops consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk areas must be compliant with the ADA and allow passengers with disabilities a clear path of travel to the transit service. Existing bus stops must be maintained as part of the final project. Metro Bus Operations Control Special Events Department and Metro Stops & Zones Department should be contacted at least 30 days before initiating construction activities.



Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators and local jurisdictions.

3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include, but are not limited to, condenser water piping, potable/fire water, storm and sanitary sewer lines, and electrical/ telecommunication services.

RECOMMENDATION: Coordinate with Metro during project design to gauge temporary and permanent utility impacts and avoid conflicts during construction.

The contractor shall protect existing above-ground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be used, interrupted, or disturbed.

When electrical power outages or support functions are required, approval must be obtained through Metro Track Allocation in coordination with Metro Real Estate for a Right of Entry Permit.



Coordination of underground utilities is critical to safely and efficiently operate Metro service.

3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

RECOMMENDATION: Ensure that hot or foul air, fumes, smoke, and steam from adjacent facilities are discharged beyond 40 feet from existing Metro facilities, including but not limited to ventilation system intake shafts and station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.



A worker breaks up concrete creating a cloud of silica dust.

Glossary

Cone of Visibility
A conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP)
Project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman
Person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone
Area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway
A channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT)
Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Joint Development (JD)
JD is the asset management and real estate development program through which Metro collaborates with developers to build housing, retail, and other amenities on Metro properties near transit, typically through ground lease. JD projects directly link transit riders with destinations and services throughout LA County.

Light Rail Transit (LRT)
Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R
Half-cent sales tax for LA County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M
Half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink
A commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority (SCRRA).

Metro Adjacent Construction Design Manual
Volume III of the Metro Design Criteria & Standards, which outlines the Metro adjacent review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus
Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes.

Metro Bus Rapid Transit (BRT)
High quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all-door boarding, and intersection crossing priority. Metro BRT may run within dedicated ROW or in mixed flow traffic on streets.

Metro Design Criteria and Standards
A compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail
Urban rail system serving LA County consisting of six lines, including two subway lines and four light rail lines.

Metro Rail Design Criteria (MRDC)
Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Rail Project.

Metro Transit Oriented Communities
Land use planning and community development program that seeks to maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements, and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed
Easement granted by property owners abutting Metro ROW acknowledging noise due to transit operations and maintenance.

Overhead Catenary System (OCS)
One or more electrified wires situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit
Written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW)
Legal right over property reserved for transportation purposes to construct, protect, maintain and operate transit services.

Southern California Regional Rail Authority (SCRRA)
A joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study
Analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit
Permit granted by Metro Rail Operations Control to allocate a section of track and perform work on or adjacent to Metro Rail ROW. This permit should be submitted for any work that could potentially foul the envelope of a train.

Wayfinding
Signs, maps, and other graphic or audible methods used to convey location and directions to travelers.

metro.net/projects/devreview/

Metro

-----Original Message-----
From: Jill Goldner [redacted]
Sent: Friday, September 4, 2020 8:44 PM
To: Masa Alkire <malkire@beverlyhills.org>
Subject: One Beverly Hills project plan

CAUTION: External Sender
Use caution when clicking links or opening attachments

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Dear Masa Alkire

I am reading through the notice in the courier.
I do not see mention of congestion and traffic noted anywhere in the initial study/Environmental impact noted.
Please add that as the city will be greatly impacted.

Kind regards,

Jill Goldner
The City keeps a copy of all E-mails sent and received for a minimum of 2 years. All retained E-mails will be treated as a Public Record per the California Public Records Act, and may be subject to disclosure pursuant to the terms, and subject to the exemptions, of that Act.

From: Frank Morse
To: Masa Alkire
Subject: Comment on Proposed Beverly Hills One Changes
Date: Monday, September 28, 2020 11:11:29 AM

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Dear Mr. Alkire:

My wife and I have been residents of Beverly Hills for the last thirty years. Therefore, we were shocked and dismayed to receive the proposed changes to the Beverly Hills One Plan. The citizens of our city had previously voted on the referendum for this development, in particular, the proposal to increase the height of the buildings beyond anything in Beverly Hills and voted the proposed changes down. The new plan forwarded by you would increase the height of the building by TWO HUNDRED AND THIRTY FEET! Really? So the vote of the population of the city means nothing? Please note that we, at least, and I suspect many others are opposed to this change and offended by the back-handed manner in which the approval in sought in spite of the voice of the people. We own a commercial building within 200 feet of the proposed new building and also have grave concerns about the increased traffic flow

Thank you for filing our strenuous objection to the increased height restrictions.

Frank and Rio Morse

THE LOS ANGELES COUNTRY CLUB
10101 Wilshire Boulevard - Los Angeles, CA 90024

OFFICE OF THE PRESIDENT

October 5, 2020

BY EMAIL AND US MAIL

Mr. Masa Alkire, AICP, Principal Planner
City of Beverly Hills Community
Development Department
455 North Rexford Drive
Beverly Hills, California 90210

malkire@beverlyhills.org

Re: Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting; One Beverly Hills Overlay Specific Plan Project

Dear Mr. Alkire:

On behalf of The Los Angeles Country Club (LACC), I am writing to provide LACC's comments to the Initial Study/Notice of Preparation (IS/NOP) for the above project.

LACC was founded in 1897 and moved to its present location in 1911. Over the years, LACC has had many prominent members, including President Ronald Reagan. LACC's golf courses enjoy international recognition as some of the most beautiful and challenging golf courses in the country. In 2010, LACC completed a major restoration of its iconic North Course, which was updated in 2020. In 2015, LACC completed a major redesign of its South Course. In each case, LACC made a substantial investment. LACC has hosted several major golf competitions, including the Los Angeles Open. In 2023, LACC will host the U.S. Open, which will attract many visitors who will patronize hotels, retail stores, and restaurants in Beverly Hills.

As the Project would be located along the entire eastern boundary of LACC's South Course, it has the potential to have a unique and significant impact on LACC's property, including its golf courses and operations. LACC does not oppose the Project; however, we want to make sure that the City of Beverly Hills fully and adequately assesses all of the Project's impacts on LACC and fully mitigates these impacts.

As set forth in the attached letter from land use counsel retained by LACC, Armbruster, Goldsmith & Delvac, the IS/NOP fails to address all of these impacts. In addition, we question whether it is appropriate for the City to continue to "tier" off the original 2007 environmental impact report given the passage of time, changes to conditions and CEQA requirements, and the significant changes to the scope and design of the original project.

Please let us know if you require any additional information. Thank you for your consideration.

Very truly yours,

Siobhan M. Burke

Siobhan M. Burke, President

cc: O'Malley Miller, Esq.
Mr. Michael Beam
Dale Goldsmith, Esq.

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October 5, 2020

BY EMAIL

Siobhan M. Burke, Esq.
President
The Los Angeles Country Club
10101 Wilshire Boulevard
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siobhanburke@paulhastings.com

Re: Notice of Preparation for the One Beverly Hills Overlay Specific Plan Project

Dear Siobhan:

We have reviewed the Initial Study and Notice of Preparation ("IS/NOP") for the proposed modifications the One Beverly Hills Overlay Specific Plan Project (the "Project"), which is located immediately to the east of the Los Angeles County Club ("LACC"). Given this close proximity, the Project has the potential significantly to impact the LACC during both construction and operation. As set forth below, the proposed scope of the Supplemental Environmental Impact Report ("SEIR") as identified in the IS/NOP does not address the full range of potential environmental impacts to the LACC. All undefined, capitalized terms below have the same meaning as in the IS/NOP.

A. Discussion

1. Project Description. The IS/NOP states that the proposed heights of the new Santa Monica Residences and the Beverly Hilton are 410 feet and 124 feet, respectively. However, these heights are confusingly measured from different datum points than used for the existing approved project. Moreover, it is not clear which datum point is used to measure the height of the Garden Residences. The SEIR should measure height for all buildings based on the same datum points as the existing approved project to avoid possible confusion.

2. Shade/Shadow Impacts. The IS/NOP discloses that the shade/shadow impacts under the proposed Project would be greater than shade/shadow impacts identified in the previous environmental documentation. The Project would result in greater shading of LACC's South and North Golf Courses from late October through early April. Moreover, the Project would exceed the applicable significance threshold for shade/shadow impacts between late October and early April. (IS/NOP, pp. 35-38.)

Between early April and late October, the Project would also shade the Los Angeles Country Club's South Golf Course from at least 7:30 a.m. to noon and would cast longer and larger shadows than the existing approved buildings. (IS/NOP, pp. 35-38.)

These shadows will adversely impact the grass and other vegetation on the North and South Golf Courses. Yet, the IS/NOP dismisses these impacts as less than significant aesthetic impacts. However, the shadows will have other impacts than aesthetic as set forth below.

a. Land Use. The Project shadows have the potential of killing the grass on the fairways and the greens in the rough of the North and South Golf Courses as well as other vegetation, such as trees and shrubs. In addition, the Project may result in the growth of errant species of grasses in the greens, such as *poa annua*, which the Club dedicates significant resources (both in manpower and money) to eradicate. These issues would render certain holes effectively unusable, severely impact LACC operations, and create a land use incompatibility. The SEIR needs to address this.

b. Cultural Resources. The Project is located immediately to the east of the LACC. Given the cultural and historic significance of the LACC, the EIR must fully analyze the Project's potential cultural resource impacts.

As you know, the LACC is one of the oldest and longest-standing recreational clubs in Southern California. It was founded in 1897 and in the very early years operated at a few different sites. The LACC found its permanent home in 1911 at the border between Beverly Hills and Los Angeles. It has played a major role in golf and recreation in Southern California, including hosting the Los Angeles Open Tournament five times from 1926-1940, and more recently, in 2017, The Walker Cup Match. In 2010, the North Course was restored to the design created by noted course architect George C. Thomas, Jr., which restoration was further updated in 2020. Thomas designed a number of leading courses throughout the country, including five in the Los Angeles area.

Club member Sumner Hunt was the architect for the Clubhouse itself. Hunt designed some of LA's oldest extant historic buildings. Beyond its courses and Clubhouse, the LACC is important in local history for its association with many prominent members, including President Ronald Reagan.

The Project proposes construction of three towers ranging from 124 feet with 11 stories, 360 feet with 28 stories, and 410 feet with 32 stories. While the Project is located in the general area of buildings of varying heights, no building in the vicinity of the LACC is nearly as tall as the immediately adjacent towers proposed by the Project. Impacts from these new buildings and the overall Project must fully addressed.

c. Recreation. The LACC is a world-class recreational facility. The SEIR needs to analyze how Project shade/shadows will adversely impact the LACC's operations.

3. Transportation and Traffic. As you know, the LACC has been selected for the site of 2023 U.S. Open. This is a new circumstance the has arisen following certification of the prior SEIR. You have informed us that the tournament will be played on the North Course, and

spectators will need to cross Wilshire Boulevard on foot from the South Course, where parking and corporate hospitality will be located. During both construction and operation, Project traffic has the potential to create safety issues due to pedestrian/vehicular conflicts. The SEIR needs to address this.

4. Noise. The U.S. Open is a major tournament that will be televised worldwide. Project construction noise and vibration have the potential to disrupt the tournament and interfere with the television broadcast. The SEIR needs to analyze this.

5. Cumulative Impacts. As required under CEQA, the SEIR must analyze potential cumulative impacts associated with all of the foregoing.

B. Conclusion

The Project has the potential to cause significant environmental effects that would seriously interfere with the LACC's operations during both construction and operation. Therefore, the SEIR needs to address the above issues and provide appropriate mitigation measures and alternatives.

Sincerely,



Dale J. Goldsmith

cc: O'Malley Miller, Esq.
Mr. Michael Beam

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October 5, 2020

Masa Alkire
AICP, Principal Planner
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455 North Rexford Drive
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Re: Comments to Notice of Preparation for a Supplemental Environmental Impact Report for the One Beverly Hills Overlay Specific Plan Project

Dear Mr. Alkire:

Our firm submits these comments on the Notice of Preparation ("NOP") for a Supplemental Environmental Impact Report ("SEIR") for the One Beverly Hills Overlay Specific Plan Project ("Project" or "One Beverly Hills") on behalf of The Belvedere Hotel Partnership ("Belvedere"), the owner of The Peninsula Beverly Hills ("The Peninsula"). The Peninsula is a long-standing contributing member of the City of Beverly Hills (the "City") and the local civic and business community—having opened its doors to the City almost 30-years ago in 1991—and Belvedere seeks to ensure that any impacts and changes to the unique identity and character of the City, of which the Peninsula is a strong part, are sufficiently addressed. Belvedere appreciates the opportunity to comment on the NOP. We offer the following comments for your consideration and we request that these comments be included and incorporated into the environmental review and analysis of One Beverly Hills.

A. CEQA Requires a New, Subsequent EIR for One Beverly Hills Rather than a Supplemental EIR in Order to Analyze the Whole of the Action

The California Environmental Quality Act ("CEQA") is clear that where an Environmental Impact Report ("EIR") has already been prepared for a project, another EIR for that project is required only when at least one of three conditions described in Public Resources Code § 21166—(1) substantial changes to the project, (2) substantial changes to the surrounding circumstances, or (3) new information since the previous EIR—is present.[1] Notably, Public

[1] Public Resources Code § 21166 provides in its entirety: "[w]hen an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs: (a) Substantial changes are proposed in the project which will require major revisions of the environmental impact report. (b) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report. (c) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available."

Resources Code § 21166 provides for two EIR options—a (new) Subsequent EIR[2] and a Supplemental EIR—when one of the three conditions is present, but does not detail the appropriate instances for when to use one option or the other. Fortunately, CEQA Guidelines[3] § 15163 fills in the missing gaps. CEQA Guidelines § 15163(a) allows for a lead agency, such as the City, to prepare a Supplemental EIR "rather than a subsequent EIR if: (1) Any of the conditions described in section 15162[4] would require the preparation of a [S]ubsequent EIR, and (2) *Only minor additions or changes* would be necessary to make the previous EIR adequately apply to the project in the changed situation."[5] (CEQA Guidelines § 15163(a) (emphasis added.))

Put simply, this means that if—as here—anything more than minor additions or changes (*e.g.*, major changes) are needed to make the previous EIR adequately apply to the project in the changed situation, than preparation of a Supplemental EIR, *rather than a Subsequent EIR*, would be a violation of CEQA. In other words, a Supplemental EIR, rather than a Subsequent EIR, would only be appropriate when it is necessary to modify only limited portions of the previous EIR rather than to overhaul significant portions of the document.

The City, by preparing a Supplemental EIR, does not dispute that the conditions described in Public Resources Code § 21166 (and CEQA Guidelines § 15162) are present, but rather recognizes that there are in fact substantial changes to the previously approved project and to the circumstances under which the project is being taken. Given the extent of the changes in One Beverly Hills and the changed circumstances, it would be difficult for the City not to recognize that the Public Resources Code § 21166 conditions are present. However, it is similarly difficult for the City not to recognize that *major* EIR revisions are necessary to make the previous EIR adequately apply to One Beverly Hills.

To start with, the City seeks to combine the EIRs from two separately approved projects—the Beverly Hilton Specific Plan 2008 EIR ("2008 EIR") and 9900 Wilshire Specific Plan 2016 SEIR ("2016 SEIR")—into a single Supplemental EIR for One Beverley Hills.[6] However, it is difficult to see how a complete combination of two separate EIRs would classify

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[2] The Supreme Court, in *Friends of the College of San Mateo Gardens v. San Mateo County Community College District* (2016) 1 Cal.5th 937, 952, fn.3, held that "[a]lthough CEQA distinguishes "subsequent" EIRs (§ 21166) from initial [, new] EIRs (see § 21151), both types of EIRs [will yield substantially the same result, as both] are subject to the same general procedural and substantive requirements."

[3] The CEQA Guidelines are found in title 14 of the California Code of Regulations, section 15000 et seq.

[4] CEQA Guidelines § 15162 expands and refines the conditions described in Public Resources Code § 21166.

[5] As elaborated more fully below, note the use of the *singular* "previous EIR" here.

[6] As the City knows, One Beverly Hills is a proposed unified development plan that consists of three sites—(1) Beverly Hilton Specific Plan site, which has an approved entitlement for development that underwent prior environmental review in the 2008 EIR; (2) 9900 Wilshire Specific Plan site which has an approved entitlement for development that underwent prior environmental review in the 2016 SEIR; and (3) 9988 Wilshire Boulevard ("Gas Station Site"), which has no approved entitlement for development.

as a minor change to whichever of the EIRs is considered the previous EIR. In either instance, adding the environmental analysis from the 2008 EIR to the 2016 SEIR or from the 2016 SEIR to the 2008 EIR would entail more than "minor additions or changes" to whichever one is considered the previous EIR.

Critically, CEQA Guidelines § 15163(a) discusses making the previous EIR adequately apply to the project in the singular. In other words, it does not contemplate making the previous EIR<u>s</u> (plural) adequately apply to the project in the changed situation. And the City does not evidence any other authority for this consolidated approach.

The likely reason that CEQA Guidelines § 15163(a) only discusses the appropriateness of a Supplemental EIR in the context of a *single* previous EIR is that because for purposes of CEQA, a "project" is defined as comprising "the whole of an action" that has the potential to result in a direct or reasonably foreseeable indirect physical change to the environment. (CEQA Guidelines §15378(a).) "[A] narrow view of a project could result in the fallacy of division [citation], that is, overlooking its cumulative impact by separately focusing on isolated parts of the whole." [Citation.]" (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730 ("*San Joaquin Raptor*").) A single project may not be divided into smaller pieces (*i.e.*, piecemealed) for individual environmental reviews that do not adequately account for the project's overall impacts. (*Aptos Council v County of Santa Cruz* (2017) 10 Cal.App.5th 266.) The rule against piecemealing "ensures 'that environmental considerations do not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences.' [Citations.]" (*San Joaquin Raptor*, *supra*, at 730.)

Combining the prior environmental reviews of two smaller projects (*i.e.*, the 2008 EIR and 2016 SEIR) into a single environmental document, albeit one which will be supplemented, will necessarily result in piecemealing the larger project in order to avoid identifying, analyzing, and mitigating the environmental impacts of the new unified larger project; and as such would render the previous environmental documents misleading because neither evaluated the "whole of the project." The environmental review here must be rewritten from the ground up and look at the whole of One Beverly Hills and not just at its individualized subcomponents in isolation. Sometimes, "the whole is greater than the sum of its parts"—and the City must, in compliance with CEQA, find out if that is the case here.

In fact, a review of the Initial Study prepared for the Project (the "<u>IS</u>"), does not allay concerns about piecemealing the environmental review. Based on our review of the IS, it appears that the City's analysis may either intentionally or inadvertently accede to "cherry-picking" the previously identified environmental effects (or lack thereof) in order to avoid further environmental analysis for the "whole of" One Beverly Hills. *Compare,* for example, the answer to IS § 7.a.1. ("Geology and Soils"), on pp. 66-67, which *only* discusses the prior environmental analysis of the 2016 SEIR (*i.e.*, no mention of the 2008 EIR) to the immediately next answer to IS § 7.a.2. ("Geology and Soils"), on pp. 67-68, which *only* discusses the prior environmental

analysis of the 2008 EIR (*i.e.*, no mention of the 2016 SEIR). If this continues into the EIR process, inevitably, the analysis will fall through the cracks, which unquestionably will subvert the mandated "adequacy, completeness, and [] good faith effort at full disclosure" of an EIR. (*See* CEQA Guidelines § 15151.)

Accordingly, under the clear direction of the abovementioned CEQA principles, we believe the City must prepare a Subsequent (*i.e.*, new) EIR to analyze the entire One Beverly Hills and all unstudied significant environmental impacts of the Project when considered as a whole; and the City's attempt to prepare a combined Supplemental EIR in its stead, without this holistic environmental analysis, is unmistakably done in error.

B. The Changes to the Projects and Changed Circumstances Requires a New, Subsequent EIR

Even assuming combining two previous EIRs is compliant with CEQA, given the extent of the changes to the projects (even considered as a whole) and the changed circumstances under which One Beverly Hills is being undertaken, the City must look at One Beverly Hills as a new project and accordingly prepare a new, subsequent EIR.

Compared to the prior projects, One Beverly Hills *inter alia* includes an alternative "unified" site development with modified land uses (*e.g.*, 67 more total residential units[7]), an additional parcel, which moreover was previously utilized as a gas station (a use inherently linked to hazardous materials), and most saliently substantially increased building heights (*e.g.*, a staggering 236' 0" (and ~221%) *increase* to the maximum building height of the 9900 Wilshire Boulevard site (to 410' 0")). These encapsulate a substantially changed project.

Furthermore, the circumstances and environment surrounding the project has also substantially changed, especially since the time the 2008 EIR was certified. Since 2008, significant nearby development has been completed, including 10000 Santa Monica (which is oft referenced in the IS), the Century City Mall expansion, the redevelopment of the Century Plaza Hotel, as well as other changes in the 12-years since certification. Moreover, in 2010, subsequent to the 2008 EIR certification, the City adopted a new General Plan that not only modifies the controls for the One Beverly Hills sites, but also for the entire City as a whole. These encapsulate substantially changed circumstances.

Collectively, these encapsulate a substantially changed situation that questions the informational value of the 2008 EIR and 2016 SEIR and accordingly necessitates new environmental review. In fact, the IS highlights this substantially changed situation, but the City does not identify how only minor additions or changes would be necessary to make the previous EIRs adequately apply to the project in the changed situation. Conversely, the City explicitly recognizes, in the IS, that the changed situation could "require ***major*** EIR revisions." (*See* IS p.

[7] This assumes all 30 accessory spaces are used as staff living quarters.

32 ("Air Quality"); IS p. 74 ("Greenhouse Gas Emissions"); IS p. 77-78 ("Hazards and Hazardous Materials"); IS p. 88 ("Land Use and Planning"); IS p. 93 ("Noise"); IS pp. 105-106 ("Transportation"); IS p. 111 ("Tribal Cultural Resources"); and IS p. 117 ("Utilities and Service Systems").)

As discussed above, pursuant to CEQA Guidelines § 15163(a)[8], so long as major revisions (as opposed to only minor additions or changes) are necessary to make the 2008 EIR and 2016 SEIR apply to One Beverly Hills in the changed situation, the City must prepare a Subsequent (*i.e.*, new) EIR to analyze the substantially changed situation of One Beverly Hills and all unstudied significant environmental impacts of the substantially changed Project and circumstances; and the City's attempt to prepare a combined Supplemental EIR in its stead is unmistakably done in error.

C. Expanded Environmental Analysis in the SEIR would be Required

Belvedere appreciates the City's decision to *at the very least* resume the CEQA analysis by preparing a SEIR for One Beverly Hills and undertaking further study of various subject areas that due to the changed situation of One Beverly Hills may result in either new significant environmental effects that were not identified previously or a substantial increase in the severity of previously identified significant effects.[9] Belvedere submits the following items for further analysis in the SEIR—should the City decide to proceed, in error, with a SEIR (instead of a Subsequent, new EIR):

1. *Aesthetics Impacts Analysis Needs to be Included and Fully Evaluated*

The City relies on Public Resources Code § 21099(d)(1)[10] to statutorily avoid any analysis of the aesthetic (and parking) impacts of One Beverly Hills—and most saliently its significantly increased building heights. However, the applicability of the Public Resources Code § 21099(d)(1) "exemption" here is misguided.

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[8] Again, this is based on the erroneous assumption that combining two previous EIRs is compliant with CEQA Guidelines § 15163(a) (and CEQA generally).

[9] As per the IS, the City will undertake further environmental review, in some capacity, of ten subject areas: (1) Air Quality; (2) Cultural Resources; (3) GHG; (4) Hazardous Materials; (5) Land Use; (6) Noise; (7) Public Services; (8) Transportation; (9) Tribal Cultural Resources; and (10) Utilities; (as well as cumulative impacts). The sheer number of areas that require further environmental review can *prima facie* be understood to mean that major changes are needed to the prior environmental documentation.

[10] Public Resources Code § 21099(d)(1) provides: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."

There are certain eligibility requirements that need to be met in order to be "exempt" from analyzing aesthetic (and parking) impacts under Public Resources Code § 21099(d)(1). One such requirement is that the project site be "within a transit priority area."

Public Resources Code § 21099(a)(7) defines "[t]ransit priority area" as "an area within one-half mile of a major transit stop…"

In turn, Public Resources Code § 21064.3 defines "[m]ajor transit stop" as "a site containing any of the following: (a) An existing rail or bus rapid transit station. (b) A ferry terminal served by either a bus or rail transit service. (c) The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."

The City, in the IS, at p. 23, provides:

> "The project site is located in a transit priority area, defined as an area within 0.5 mile of a major transit stop that is existing or planned (PRC Section 21099[a][7]). The definition of a major transit stop includes sites containing the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (PRC Section 21064.3).[11] The project site is immediately adjacent to the Wilshire Boulevard/Santa Monica Boulevard and Wilshire Boulevard/Whittier Drive bus stops that service several bus routes, including but not limited to LA Metro Lines 20 and 720, which run along Wilshire Boulevard, and Lines 4 and 704, which run along Santa Monica Boulevard. These bus routes have service intervals of 15 minutes or less during peak hours."

As such, the City relies on two (*see* "intersection") of the listed LA Metro Lines (*i.e.*, "LA Metro Lines 20 and 720 [] and Lines 4 and 704") *currently* having service intervals of 15 minutes or less during the morning and afternoon peak commute periods for the "major transit stop," which in turn qualifies the One Beverly Hills site as a "transit priority area" and allows it to rely on the "exemption" provided by Public Resources Code § 21099(d)(1).

However, our review, as detailed below, of the four listed LA Metro Lines *does not evidence* that this is actually the case for more than one of the listed Lines (and accordingly the "intersection" is missing). More specifically, a review of the *current* peak service intervals for these four bus routes appears to evidence that listed LA Metro Lines, other than LA Metro Line 720 (*i.e.*, LA Metro Lines 20, 4, and 704), in fact have peak service intervals *greater than* the 15-

[11] "The morning peak commute period is generally from 7:00 a.m. to 9:00 a.m., and the afternoon peak commute period is generally from 4:00 p.m. to 6:00 p.m." This footnote is taken directly from the IS, in which it is numbered footnote 7.

minute threshold; and as such the City lacks the substantial evidence necessary to ultimately reasonably determine that the One Beverly Hills site is within a transit priority area—and critically, the eligibility for the "exemption" from analyzing aesthetics (and parking) impacts under Public Resources Code § 21099(d)(1) appears to be unsupportable.

LA Metro has adjusted service in response to COVID-19.[12] (*See* Exhibit A—printed on September 24, 2020).) As such, the current service intervals—*i.e.*, those to use for determination of a major transit stop—for LA Metro Lines 4, 20, and 704 are different than what they may have been in the past[13]; and more importantly, do not currently appear to have the necessary peak service intervals of 15 minutes or less.

a. *LA Metro Line 20*

LA Metro Line 20 is currently running on a Sunday schedule with additional weekday service. (*See* Exhibit A.) This means that LA Metro Line 20 operates on a Sunday schedule with specifically listed additional weekday service. (*See* Exhibit B—downloaded on September 24, 2020).) The current route map and service intervals for LA Metro Line 20 (effective July 27, 2020) are included as Exhibit C—downloaded on September 24, 2020. A review of the Sunday section of Exhibit C evidences that LA Metro Line 20 in fact has peak service intervals *greater than* 15 minutes.[14]

As such, LA Metro Line 20 does not qualify as the major transit stop the City relies on in the IS.

b. *LA Metro Line 4*

LA Metro Line 4 is currently running on a Sunday schedule with additional weekday service. (*See* Exhibit A.) This means that LA Metro Line 4 operates on a Sunday schedule with specifically listed additional weekday service. However, note, that it is unclear what additional weekday service, if any, has been added to the Sunday schedule. (*See* the lack of service change notes for LA Metro Line 4 at Exhibit D—printed on September 24, 2020.) The current route map

[12] Unfortunately, there is no indication of when the impacts of COVID-19 will end and when, *if ever*, service intervals may return to prior intervals. More to that point, given the impacts that COVID-19 will have on all aspects of life, perpetual changes to ridership demands (holistically and to specific destinations) are expected to be sustained for at least the foreseeable future and service (including service intervals) cannot be reasonably expected to return to an identical situation to what existed prior to COVID-19. In any event, given the current service levels of the LA Metro Lines listed in the IS, the City fails to identify a qualifying "major transit stop."

[13] Given that the IS was only circulated in September 2020, it is questionable what "past" service intervals for these LA Metro Lines the City relied on in making this major transit stop determination at the time it prepared the IS, as the discussed service levels have apparently been the same for at least the past few months.

[14] As per Exhibit B, only one additional trip has been added to the weekday service for LA Metro Line 20. Nonetheless, the trip is entirely outside the peak hours and as such is irrelevant to the major transit stop calculus.

and service intervals for LA Metro Line 4 (effective June 21, 2020) are included as Exhibit E—downloaded September 24, 2020. A review of the Sunday section of Exhibit E evidences that LA Metro Line 4 in fact has peak service intervals *greater than* 15 minutes.

As such, LA Metro Line 4 does not qualify as a major transit stop the City relies on in the IS.

c. *LA Metro Line 704*

LA Metro Line 704 is currently running on a Sunday schedule. (*See* Exhibit A.) The current route map and service intervals for Metro Line 704 (effective June 21, 2020) are included as Exhibit F—downloaded on September 24, 2020. A review of the Sunday section of Exhibit F evidences that LA Metro Line 704 has peak service intervals *greater than* 15 minutes.

As such, LA Metro Line 704 does not qualify as a major transit stop the City relies on in the IS.

Given the currently adjusted service schedules, and the now apparent ineligibility, in contrast to the City's contentions, of Public Resources Code § 21099(d)(1) (as the City does not present an "intersection" of suitable routes), the City must *fully* analyze the impacts on aesthetics (and parking) of One Beverly Hills, especially the impacts the substantially increased building heights will have on *inter alia* scenic vistas, light and glare, and shade and shadow.[15] For the City to rely on Public Resources Code § 21099(d)(1), in light of the evidence presented questioning the One Beverly Hills site's eligibility, would unmistakably be in error.

2. *Geology and Soils Impacts Analysis of the SMFZ Needs to be Included*

The IS recognizes that the Alquist-Priolo Earthquake Fault Zoning Map for the City was revised in 2018 to include extensions of the Santa Monica [Earthquake] Fault Zone ("SMFZ") nearby the One Beverly Hills site. (IS at pp. 66-67.) This is new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the 2008 EIR and 2016 SEIR were certified. (Public Resources Code § 21166(c); CEQA Guidelines 15162(a)(3).) However, the City has determined that further analysis of the environmental impacts of the newly discovered extensions of the SMFZ is not warranted. The support that the City presents, in the IS, to reach this conclusion as to the *entire* One Beverly Hills is lacking in several respects.

[15] The analysis provided in the IS "for information purposes only" of One Beverly Hills' aesthetic impacts is just that—"for information purposes only." The SEIR needs to undertake a proper review of this topic area and not simply rely on "information only" analysis that was ostensibly not conducted with the proper vigor and intentions given the IS's overarching reliance on, the ineligible, Public Resources Code § 21099(d)(1) to exempt the analysis in any event. Not to mention, the City General Plan stresses the importance of maintaining and protecting significant visual resources and aesthetics that define the City. (*See* City General Plan, Open Space Chapter, p. 89, policies OS 6.1-6.2.)

First, the City in its answer to IS § 7.a.1.[16] ("Geology and Soils"), on pp. 66-67, presents an unsupported conclusion by stating the impacts of the new nearby SMFZ extensions are "similar to the Existing Specific Plans, the proposed Project would not increase geologic hazards related to surface rupture, and impacts would be less than significant. Further analysis of this issue is not warranted." (IS at p. 67.) Yet, the support that the City uses to reach this conclusion as to the *entire* One Beverly Hills site is lacking. More specifically, as discussed above, the City *only* references prior impacts "analysis" as to only the 9900 Wilshire Specific Plan site, *but not* as to the Beverly Hilton Specific Plan site nor to the Gas Station Site. Furthermore, the studies cited in the City's answer to IS § 7.a.1 to contrive the less than significant impact determination are from years *prior to* 2018 (*i.e.*, prior to the discovery of the nearby extensions of the SMFZ) and as such prior to this new information of substantial importance becoming available.[17] Further analysis must be conducted to assess impacts to the entire One Beverly Hills site.

Additionally, the City in its answer to IS § 7.a.2.[18] ("Geology and Soils"), on pp. 67-68, recognizes that nearby extensions of the SMFZ may cause moderate to severe ground shaking, but relies on Mitigation Measure MM-GEO-1, as amended, from the 2008 EIR in order to reduce impacts to a less than significant level "[r]egardless of the increased height of the proposed [One Beverly Hills] buildings." (IS at pp. 67-68.) However, the applicability of MM-GEO-1 sufficiently reducing the impacts to One Beverly Hills, and the substantially increased building heights, has not been sufficiently established. No study has been presented as to the impacts of the new nearby SMFZ extensions as to the *entire* One Beverly Hills. The answer to IS § 7.a.2 relies on a 2018 study done only for a proposed, but ultimately unapproved, 2018 amendment to the Beverly Hilton Specific Plan ("2018 Amendment"), which was only done with respect to the Beverly Hilton Specific Plan site (*i.e.*, not to the *entire* One Beverly Hills site) and which proposed project had heights nowhere near the building heights of One Beverly Hills.[19] Further

[16] IS 7.a.1.asks "Would the Project: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?"

[17] In its response to IS 7.a.1, the City relies on a *2014* Geocon West, Inc. study (of just the 9900 Wilshire Specific Plan site), a *2015* Leighton Consulting, Inc. study (of an unrelated nearby site), and a *2016* Geocon West, Inc. study (of the general site vicinity). Again, there has been no analysis done for the *entire* One Beverly Hills site, let alone *after* this new information has become available.

[18] IS 7.a.2.asks "Would the Project: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?"

[19] The maximum building height of the proposed 2018 Amendment to the Beverly Hilton Specific Plan, was 307 feet. (*See* the NOP prepared for the 2018 Amendment (May [2018]) at p.3.) The maximum building height proposed for One Beverly Hills is 410 feet—over 100 feet higher than the highest building height of the proposed 2018 Amendment; and not to mention on a completely different portion of the One Beverly Hills site, as the 410-foot building would be on the 9900 Wilshire Specific Plan site whereas the proposed 2018 Amendment was made with respect to only the Beverly Hilton Specific Plan site. Furthermore, One Beverly Hills includes a 369-foot building

analysis needs to be conducted to assess the sufficiency of MM-GEO-1, specifically as it applies to One Beverly Hills.

All-in-all, new studies addressing the environmental impacts of the newly discovered extensions of the SMFZ as it applies to the entire One Beverly Hills site and *inter alia* the Project's substantially increased building heights must be included in the SEIR.

3. *Other SEIR Environmental Analysis Required*

Again, Belvedere appreciates the City's decision to *at the very least* undertake further environmental analysis in the SEIR. Belvedere submits the following items for further consideration and analysis in the SEIR:

a. *Project Impacts Splitting*

As discussed above, any supplemental environmental analysis leveraged from two disparate previous EIRs (*i.e.*, both the 2008 EIR and 2016 SEIR) runs the risk of not only ignoring environmental issues due to project splitting, but also of quantifying the prior cumulative environmental impacts from which to analyze any incremental environmental impacts. The IS runs afoul of this concern. If this continues into the EIR process, it will subvert the mandated "adequacy, completeness, and [] good faith effort at full disclosure" of an EIR. (*See* CEQA Guidelines § 15151.) Please ensure care is taken, in accounting for the cumulative environmental impacts, when conducting the further environmental impacts analysis.

b. *Gas Station Site*

In a similar vein to the above, given the heightened focus on analyzing to the prior environmental documents, neither of which included an analysis of the Gas Station Site, there are concerns that proper review of the environmental impacts of inclusion of this new site will be an afterthought. Please ensure care is taken, in accounting for the environmental impacts, of including this new (potentially hazardous) site, when conducting the further environmental impacts analysis. For example, as discussed above, the IS does not appear to discuss any analysis as to the potential impacts to the Gas Station Site due to recently discovered nearby extensions of the SMFZ.

c. *Cultural Resources*

Please ensure that *inter alia* the impacts the increased building heights have on the historic setting for *any* historic resources on and in the vicinity of the project site are studied; and not just on the "previously identified [in the 2008 EIR and 2016 SEIR] historic resources on

(also, higher than that of the 2018 Amendment) on the 9900 Wilshire Specific Plan site. Lastly, there is a 124-foot building proposed on the Gas Station Site—a site, which has previously not been included in any prior environmental analysis relied on here by the City.

and in the vicinity of the project site" as intimated in IS § 5.a. ("Cultural Resources"), on pp. 57-58.

d. *10000 Santa Monica*

While attention needs to be paid to the changed circumstances of the nearby developments in Century City in the City of Los Angeles, such as 10000 Santa Monica, the expansion of the Westfield Century City Mall, the renovation and expansion of the Century Plaza Hotel, and new Century City office buildings, it seems that in certain cases the City relies on the nearby tower development, outside of its jurisdiction, to refocus attention away from the fact that the proposed building heights are at heights significantly greater than what the City, and its unique identity and character, currently permits. (*See* for example p. 87 of the IS in which the City discusses "The scale, mass, and height of the proposed project, similar to the Existing Specific Plans, are generally consistent with existing developments in Century City to the west" in answering about dividing the community.) While this is relevant, care should also be taken to analyze the impacts of the proposed building heights specifically as it relates to the City.

e. *Public Services*

Please ensure that the impacts the increased building heights of One Beverly Hills have on public services—such as on the Beverly Hills Fire Department ("BHFD") (and the fire protection, rescue, emergency response, and emergency medical services provided by BHFD)—are fully analyzed within the SEIR. While the IS discusses that there is "new information showing potentially new or greater significant effects than [the] previous EIR[s]" that necessitates further study of this impact area in the SEIR, the information provided in the IS in this regard does not discuss any of the potential impacts on BHFD (and its facilities) caused by what would unquestionably be the tallest buildings in the City that are without precedent. As discussed throughout, the proposed building heights for the Project are substantially increased from those in the 2008 EIR and 2016 SEIR. Accordingly, please ensure that the SEIR assesses whether these substantially increased building heights would still allow BHFD to provide adequate services to serve the Project (and otherwise impact service ratios and response times in the City). For example, the increased heights of the buildings may present an unstudied and unique strain on BHFD (and risk to public safety) because a potential fire may be above the reach of the aerial ladders of the City. In the same vein, it may be required that a BHFD helicopter is required to properly service such increased building heights, which would likely necessitate new or physically altered fire protection facilities. The City must *fully* analyze all of the impacts associated with the height of the buildings as it relates to public services.

f. *Transportation*

As discussed in the IS, neither the 2008 EIR nor the 2016 SEIR assessed transportation impacts under the now required vehicle miles traveled ("VMT") metric. (*See* CEQA Guidelines § 15064.3(b).) Given the recency of the transition to VMT, we comment here to re-emphasize the importance that the VMT analysis be done accurately.

D. Conclusion

In summary, Belvedere urges the City to follow the clear direction of CEQA and prepare a Subsequent (*i.e.*, new) EIR to analyze the entire One Beverly Hills, and all unstudied significant environmental impacts of the Project when considered as a whole, in one new environmental document; and should the City decide to proceed, in error, with a SEIR (instead of a Subsequent (*i.e.*, new) EIR), then Belvedere urges the City to analyze the aesthetics impacts and the geology and soils impacts of One Beverly Hills as well as taking into consideration the other abovementioned comments.

Thank you for considering these comments. By this letter, Belvedere seeks to highlight some of the most obvious errors in the City's environmental review approach (and compliance with CEQA) for One Beverly Hills. By not commenting on each and every portion of the IS and proposed SEIR, Belvedere does not concede that the City's methodological approach or that the analysis is otherwise complete or correct. Belvedere therefore reserves all of its rights to make further comments, at the appropriate time, throughout the environmental review process for One Beverly Hills. Belvedere looks forward to reviewing the Project EIR when it is published and circulated for public comment.

Very truly yours,

Cox, Castle & Nicholson LLP



David P. Waite

Cc: Laurence Wiener, City Attorney
DPW
086563\11934193v7

EXHIBIT A

UPDATING: Metro COVID-19 news and service information

BY ANNA CHEN , MARCH 3, 2020

This page is being updated as Metro responds to the ongoing health crisis.

Sign up for updates from Metro on COVID-19

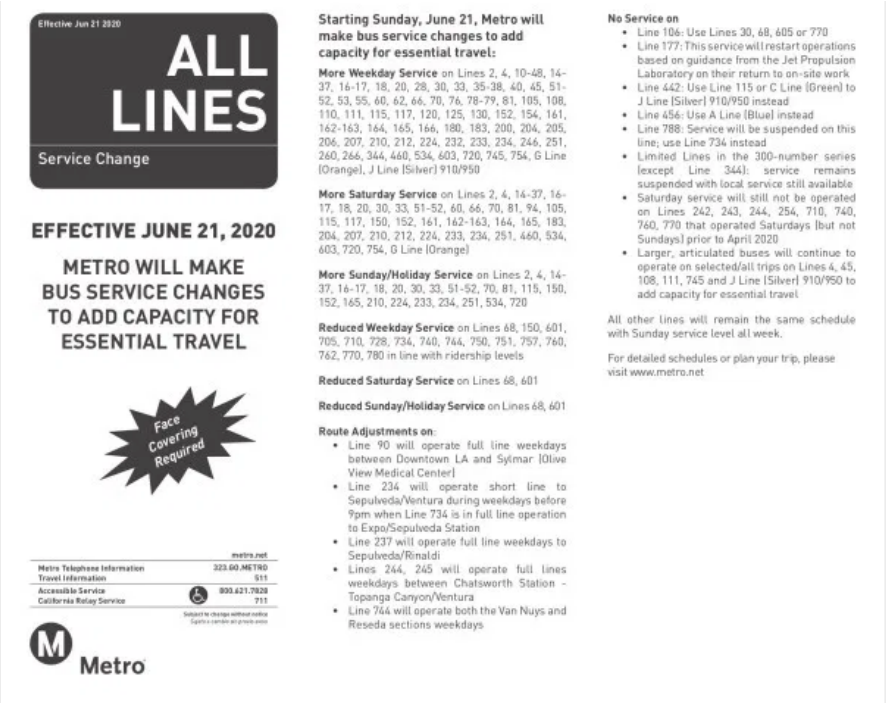
Metro COVID-19 FAQ

UPDATE, July 24, 2020:

- Face coverings are required on Metro until further notice.
- Starting Monday, July 27, Metro will add/adjust trips to the following Metro Bus lines to provide better capacity:
  WEEKDAYS
  - Lines 18, 20, 33, 45, 51, 53, 55, 66, 108, 111, 152, 204, 224, 232, Metro Rapid Lines 720 and 754.

  SATURDAYS
  - Lines 28, 81, 180/181, and 260.

New trip times will be available on Transit app (https://thesource.metro.net/2020/05/18/metro-partners-with-transit-app-to-making-riding-and-trip-planning-easier-and-more-accurate/), or the transit app of your choice, as well as posted to metro.net (https://www.metro.net/about/metro-service-changes/) as they become available.



CURRENT SERVICE (JUNE 21 UNTIL FURTHER NOTICE)

METRO BUS

- **Lines running on Sunday schedule with additional weekday service:** Local Lines 2, 4, 10, 14, 16, 17, 20, 28, 30, 33, 35, 37, 38, 40, 45, 48, 51, 52, 53, 55, 60, 62, 66, 70, 71, 76, 78, 79, 81, 105, 108, 110, 111, 115, 117, 120, 125, 130, 152, 154, 161, 162/163, 164, 165, 166, 180/181, 183, 200, 204, 205, 206, 207, 210, 212, 224, 232, 233, 234, 246, 251, 260, 266; Limited Line 344; Express Lines 460, 534; Local Lines 603, and; Metro Rapid Lines 720, 745 and 754.
- **Lines running on Sunday schedule:** 18, 71, 83, 90, 91, 92, 94, 96, 102, 155, 158, 167, 201, 217, 218, 222, 230, 236, 237, 245, 252, 256, 264/267, 265, 268; Express Lines 487, 501, 550; Local Lines 601, 602, 605, 611, 612, 665, 686/687, and; Metro Rapid Lines 704, 733.
  - **Additional Saturday service:** Lines 2, 4, 14/37, 16/17, 18, 20, 30, 33, 51/52, 60, 66, 70, 81, 94, 105, 115, 117, 150, 152, 161, 162/163, 164, 165, 183, 204, 207, 210, 212, 224, 233, 234, 251, 460, 534, 603, 720, 754.
  - **Additional Sunday service:** Lines 2, 4, 14/37, 16/17, 18, 20, 30, 33, 51/52, 70, 81, 115, 150, 152, 165, 210, 224, 233, 234, 251, 534, 720.
  - **Reduced weekday/Saturday/Sunday service:** Lines 68, 150, 242, 243, 244, 254, 601, 705, 710, 728, 734, 740, 744, 750, 751, 757, 760, 762, 770, 780, 794.
- **Lines suspended at this time:** 106, 177, 302, 312, 316, 330, 351, 353, 355, 358, 364, 378, 442, 456, and 788.
- Additional updates:
  - Any line not listed above will remain at Sunday service level all week.
  - Use Transit app to locate your ride and get up-to-date service info.
  - Line 90 will operate full line weekdays between downtown LA and Sylmar (Olive View Medical Center)
  - Line 161 service to Thousand Oaks Transit Center restored weekdays only.

- Line 234 will operate short line to Sepulveda/Ventura during weekdays before 9 p.m. when Line 734 is in full line operation to Expo/Sepulveda Station.
- Line 237 will operate full line weekdays to Sepulveda/Rinaldi.
- Lines 244 and 245 will operate full lines weekdays between Chatsworth Station – Topanga Canyon/Ventura.
- Line 744 will operate both the Van Nuys and Reseda sections on weekdays.
- Line 788 is being discontinued for the time being. Use Line 234 instead.

To assist with social distancing, all Metro Bus riders must board and exit through rear doors only (https://thesource.metro.net/2020/03/22/as-safety-precaution-all-metro-buses-must-be-boarded-in-rear-starting-monday/). The front door will remain available to wheelchair riders and those who need the wheelchair ramp. Metro is also requiring all bus operators to use the transparent protective barrier that helps isolate them. *While you are not expected to use the fare box or TAP validator at the front of the bus, please be in possession of fare during travel.*

If you are using the bike rack, please let the bus operator know before exiting the bus — to give you time to get your bike off the rack at the front of the bus.

METRO RAIL

- **G Line (Orange):** Buses will run on Saturday/Sunday schedule seven days a week with buses every 10 minutes between 8 a.m. and 6 p.m. and every 15 minutes at other times.
- **J Line (Silver):** Line 910 will run on Saturday/Sunday schedule seven days a week with buses every 15 minutes between 7:30 a.m. and 7 p.m. and every 15 to 20 minutes at other times. Line 950 to and from San Pedro will run every 30 minutes most of the day. First northbound 950 trip departing San Pedro at 5:33 a.m. will use a larger, 60-foot bus to help riders maintain physical distancing
- **A Line (Blue):** weekday trains will run every 12 minutes between 6 a.m. and 6 p.m. and 20 minutes at all other times. Weekend trains will run every 12 minutes between 10 a.m. and 6 p.m. and every 20 minutes at all other times.
- **B Line (Red) and D Line (Purple):** weekday trains on both lines will run every 12 minutes from 6 a.m. until 6 p.m. Weekend trains will run every 12 minutes on both lines from 10 a.m. until 6 p.m. and every 20 minutes at all other times.
- **C Line (Green):** weekday trains will run every 12 minutes from 4 a.m. until 9 a.m., 15 minutes from 9 a.m. until 3 p.m. and 12 minutes from 3 p.m. until 6 p.m., and every 20 minutes at all other times. Weekend trains will run every 15 minutes from 10 a.m. until 6 p.m. and every 20 minutes at other times.
- **E Line (Expo):** weekday trains will run every 12 minutes between 6 a.m. and 6 p.m. and every 20 minutes at all other times. Weekend trains will run every 12 minutes between 10 a.m. and 6 p.m. and every 20 minutes at all other times.

- **E Line (Gold):** weekday trains will run every 12 minutes between 6 a.m. and 6 p.m. and every 20 minutes at all other times. Weekend trains will run every 12 minutes between 10 a.m. and 6 p.m. and every 20 minutes at all other times.

- Final trips each day departing terminal stations will be at midnight on all trains.
  - In order to make final train connections of the night, we recommend making sure you are on the rail system no later than 10:30 p.m. If you require late night service, please consider the Owl Bus Network.

METRO BIKE

- Metro Bike Share remains available at this time. We recommend using sanitizing wipes to clean the bike before and after riding and washing your hands after a ride.
- Metro Bike Hubs are currently unstaffed but remain open 24/7 for self-parking.

SAFETY MEASURES

- Metro has installed sanitation stations and hand sanitizer dispensers at major transit stops and stations to allow riders to wash their hands, one of the best safeguards against the COVID-19 virus. Metro is also researching how to equip buses and trains with hand sanitizer dispensers to help control the virus.
- For additional information, please refer to our **FAQ.**
- The agency has strengthened cleaning at Union Station and major transit hubs. This includes an elevated focus on cleaning high touch point areas such as handrails, elevator call buttons, and TAP vending machines. Metro also continues to clean buses and trains at least once daily with EPA-approved disinfectants. We're reviewing cleaning protocols to ensure they are up-to-date as the current situation evolves. In addition, Metro is producing signage and written materials on what customers can do to reduce the risk of being exposed to the virus.
- In an effort to reduce touchpoints and conserve critical cleaning supplies and staffing resources, Metro has closed select entrances to B/D Line (Red/Purple) subway stations where multiple entrances are available. The closures will be in effect until further notice. All stations will remain ADA accessible with station elevator access and trains will continue to serve all stations. Signage will direct customers to nearby alternate entrances and exits.
  - **Union Station** Alameda/West Portal entrance to subway is closed, use Vignes/East Portal.
  - **Westlake/MacArthur Park Station** North Portal/99 Cent Store entrance is closed, use south entrance.
  - **Vermont/Santa Monica Station** Willow Brook/LACC Portal entrance is closed, use main entrance.
  - **Universal City/Studio City Station** park & ride/Citywalk entrance is closed, use bus plaza entrance.
  - **Civic Center/Grand Park Station** 1st Street entrance is closed, use Temple St. entrance.

- **Pershing Square Station** 4th NW/Angels Flight entrance is closed, use 4th Street NE entrance.
- **7th St/Metro Center** Hope St./Qdoba/Dunkin entrance is closed, use Flower St. and Figueroa St. entrances.

Best practices include:

- Wash your hands frequently with soap and warm water. Hand washing tips from the CDC are here.
- Stay home if you feel sick.
- Wearing a face covering when in public.
- Cough or sneeze into your elbow or use a tissue.
- Make sure you are using a robust, regular cleaning schedule for frequently touched surfaces such as cell phones and computers.

UPDATE, July 20, 2020:

- COVID-19 recovery task force 2nd progress report.

UPDATE, June 12, 2020:

- Metro bus operator dies from complications of COVID-19.
- Metro's Recovery Task Force releases early recommendations to improve mobility in wake of pandemic.
- Metro to pursue four-phase plan to restore bus and rail service.

UPDATE, May 21, 2020:

- Metro will run on Sunday/holiday schedule on Memorial Day Monday, May 25. Current listed schedule will resume Tuesday, May 26.

UPDATE, May 12, 2020:

- Line 125 (Rosecrans): Two extra weekday eastbound trips depart Plaza El Segundo at 8:10 a.m. and 4:14 p.m. Two extra weekdays westbound trips depart Norwalk Station at 6:10 and 9:38 a.m.
- Line 205 (Wilmington-Vermont-Western): One extra weekday southbound trip departs Willowbrook/Rosa Parks Station at 9:04 a.m. and one extra weekday northbound trip departs 13th/Gaffey at 2:10 p.m.
- Line 232 (PCH-Sepulveda): Three additional weekday northbound trips depart Downtown Long Beach Station at 5:50, 6:20 and 6:50 a.m. Two extra weekday southbound trips depart LAX City Bus Center at 5:50 a.m. and 3:15 p.m.
- Line 266 (Rosemead-Lakewood): Six extra weekday northbound trips depart Lakewood Center Mall at 5:03, 11:22 a.m., 1:24*, 4:06, 4:56, 5:50 p.m. Four extra weekday southbound trips depart Sierra Madre Villa Station at 6:40am, 1:53**, 2:58, 4:53 p.m.**

- ^ trip starts at Lakewood Bl Station
- ** trip starts at Rosemead/Garvey

UPDATE, May 11, 2020:

- Face coverings will be required on Metro beginning Monday, May 11 until further notice.
- Line 18 (6th St): Seven extra weekday eastbound trips depart Wilshire/Western at 5:32, 5:55, 6:13, 6:29, 6:43, 11:32 a.m. and 2:52 p.m. Seven extra weekday westbound trips depart Montebello Station at 5:21, 6:47, 7:07, 7:26, 7:43, 10 a.m. and 4:25 p.m.
- Line 51 (Avalon-7th): Four extra weekday northbound trips depart Avalon Station at 5:39 and 6 a.m., and depart Compton Station/MLK Transit Center at 4:37 and 5:21 p.m. Five weekday southbound trips depart Wilshire/Vermont at 6:15, 6:47, 7:00, 7:13am and 5:10 p.m.
- Line 52 (Avalon-7th): Eight extra weekday northbound trips depart Harbor Gateway Transit Center at 5:58, 6:16, 6:57, 7:20 a.m., 4:25, 4:50, 5:04 and 5:56 p.m. Seven extra weekday southbound trips depart Wilshire/Vermont at 5:19, 5:49, 6:31, 7:26 a.m., 4:08, 4:40, 6:13 p.m.
- Line 53 (Central): Seven extra weekday northbound trips depart Cal State Dominguez Hills at 6:21, 6:51, 7:21, 7:47 a.m., 3:26, 4:47 and 5:17 p.m. Four extra weekday southbound trips depart Grand/3rd at 8:02, 8:57 a.m., 1:42 and 5:25 p.m.
- Line 66 (Olympic-8th): Five extra weekday eastbound trips depart 8th/Western at 6:09, 6:36, 6:58, 7:20 and 7:42 a.m., ending at Soto/Olympic. Four extra weekday westbound trips depart Soto/Olympic at 5:40, 6:00, 6:20 and 6:40 p.m., ending at 8th/Western.

UPDATE, May 5, 2020:

- May Service Council meetings will be held online.
- Transit Safety Education program offers online curriculum for students and teachers.
- Support Eat Shop Play businesses with Takeout Tuesday.

UPDATE, April 16, 2020:

- Starting Sunday, April 19, Metro will begin running a modified Sunday service schedule every day of the week. **On weekdays:** Metro Bus will run its usual Sunday bus schedule plus some Rapid, Express, and Local bus lines that normally do not run on Sundays. Those adjusted timetables can be found here (https://www.metro.net/about/metro-service-changes/). Metro Rail will run every 12 minutes between 6 a.m. and 6 p.m. and every 20 minutes at other times. **On weekends:** Metro will run regular Sunday service on bus and rail. All Metro bus and rail timetables can be found here (https://www.metro.net/riding/maps/) — scroll down each timetable until you see the page for 'Sunday' service. **Line-by-line details can be found here (https://thesource.metro.net/2020/04/14/schedule-change-for-metro-buses-and-trains-begins-sunday-april-19/).**
- Metro's April Board and Committee meetings will be held virtually. Click here for details on how you can tune in and to review the agenda items.
- L.A. County has mandated face coverings for everyone when in public engaging in essential activities. While face coverings are not required to ride Metro, we recommend all transit riders wear face coverings and/or masks on our buses and trains as well. Please note that face coverings and masks do not replace other public health hygiene practices. We ask everyone to continue limiting travel to only essential trips, maintain physical distance from others, wash hands frequently and use other good hygiene practices.
- Some tips on how to bicycle for health and essential travel. These include making sure your bike is in good working order, gearing up with helmets, gloves and face coverings, and making sure to wash your hands immediately after a ride.

- Metro recommends that all transit riders wear face coverings and/or masks on our buses and trains. Please note that face coverings and masks do not replace other public health hygiene practices. We ask everyone to continue limiting travel to only essential trips,

- We are running as many buses as we can with available staff and we're continuing to monitor and adjust service to meet demand and ensure essential workers can travel while maintaining a safe social distance. Because these adjustments are happening in real-time, our arrival data on NexTrip may not be accurate.
- Angel's Flight closed beginning Saturday, March 28, 2020 until further notice.
- Metro will be joining the city of Los Angeles Department of Transportation in providing bus transportation to those who may need alternative aid, such as social service assessment, shelter or mental health services. If you encounter individuals in need, please call 888.950.7233 or alert Metro staff so we can help connect unhoused riders with essential programs and services in the region.

TAP Customer Service

- All processing of paper reduced fare applications are suspended until further notice.
- On-line reduced fare applications processing will continue.
- Mail-in TAP card processing will continue.
- Please email CustomerService@taptogo.net if you have questions or concerns.

Metro Customer Centers (https://www.metro.net/about/contact/)

- All Metro Customer Centers will remain open but with limited hours.
  - Union Station East Portal and Wilshire/Vermont will remain open Monday through Friday from 10 a.m. to 2 p.m.
  - Baldwin Hills and East Los Angeles Center will remain open Tuesday through Saturday from 10 a.m. to 2 p.m.

Metro Lost and Found (https://lostandfound.metro.net/public/new_claims_inquiry.aspx)

- Office will be closed. Lost items will be held until further notice.
- Customer bike picks-ups are suspended.
- Please use our online form to submit a claim.

UPDATE, March 26, 2020:

- Metro has made emergency adjustments to Via to ensure there are transportation options for people who need them most during this difficult time. Via will now provide point-to-point trips within service zones. This will allow anyone traveling within the El Monte, North Hollywood and Compton zones to reach essential destinations. Via is discontinuing shared rides and shifting to private rides in support of social distancing. Riders can bring along one additional rider. Drivers will continue to carefully wipe down all vehicle surfaces before driving and as often as possible during their shifts, with special attention to surfaces that passengers frequently come in contact with.
- For those staying at home: here's a TAP Coloring Book you can download.
- We are running as many buses as we can with available staff and we're continuing to monitor and adjust service to meet demand and ensure essential workers can travel while

maintaining a safe social distance. Because these adjustments are happening in real-time, our arrival data on NexTrip may not be accurate.

UPDATE, March 24, 2020:

- A maintenance worker at Metro's Division 5 bus yard in South Los Angeles has tested positive (https://thesource.metro.net/2020/03/24/metro-maintenance-employee-tests-positive-for-covid-19-virus/) for the COVID-19 virus.

  The employee was last at work on Monday, March 16, and Metro received confirmation of a positive COVID-19 test on Monday, March 23. The worker had been hospitalized but was released to go home and recover under quarantine.

  Co-workers at Division 5 who may have been in contact with the employee within the past 14 days have been notified by Metro. Per U.S. Centers for Disease Control and Prevention protocols, they have been asked to self-monitor their health, including taking their temperatures twice each day and seeking health care if they develop a fever or other symptoms of the virus.

  Metro thoroughly cleaned and disinfected the areas of Division 5 where the employee worked on Tuesday morning.

OTHER

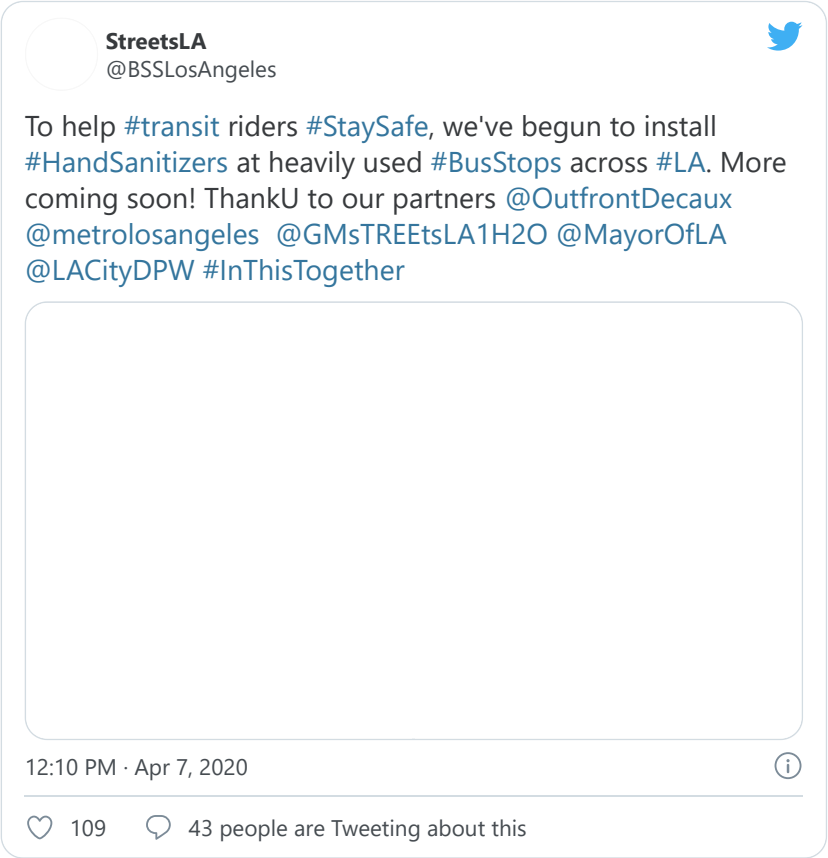
- Metro will be keeping an eye on ridership in the days ahead and may make other quick-strike adjustments to reflect current demand and deploy service to areas most in need. This means NexTrip and other trip planning apps may not have accurate arrival times. If you need assistance locating your bus, call 323.GOMETRO or message us on Twitter @metrolaalerts.
- Metrolink adjusts schedules effective Thursday, March 26 until further notice. Metrolink ridership is down around 80% systemwide, which means a temporary reduction of service levels can occur without the danger of creating crowding situations on trains.

UPDATE, March 23, 2020:

- Two contractors working on Metro construction projects have been confirmed as having the COVID-19 virus. Neither had any involvement with the day-to-day operations of the Metro bus and rail system. The first case involves a field electrical subcontractor working on the Portal Widening & Turnback Facility project at the Red/Purple Line subway yards in downtown Los Angeles. The second case involves a document worker for Walsh Shea Corridor Constructors, the firm building the Crenshaw/LAX Line light rail project. Staff that were in contact with the contractors have been asked to self-quarantine and remain from their work sites. More info here.
- Metro continues to do its best to protect riders and agency employees from COVID-19. Cleaning of buses, trains and facilities has been strengthened. Gloves are available to bus operators who are also required to use the protective barriers between the driver's seat and

maintain physical distance from others, wash hands frequently and use other good hygiene practices.

- Metro is also exploring closing select entrances to rail stations that have multiple entrances. ADA access will be maintained at all stations. This would be done to reduce the number of "touchpoints" that must be frequently cleaned, which in turn would allow Metro to concentrate on keeping the rest of the system as clean as possible.



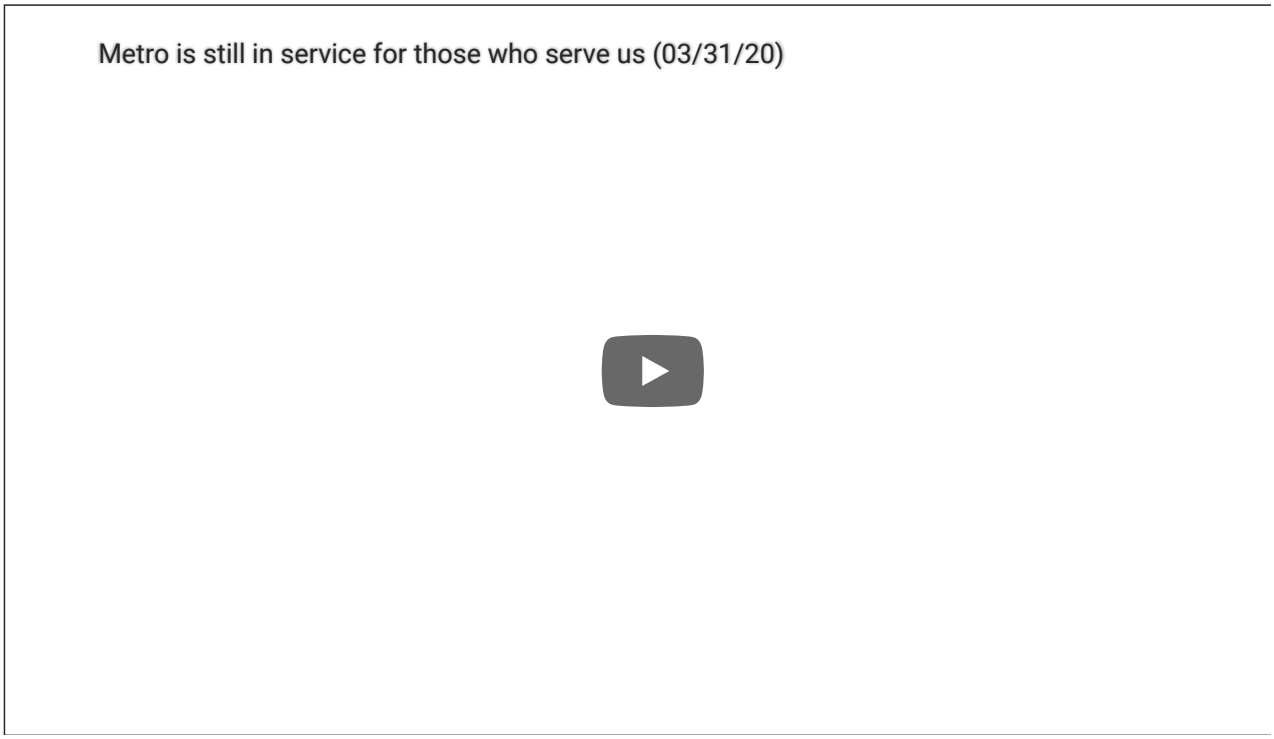
UPDATE, April 3, 2020:

- Los Angeles Mayor Eric Garcetti is now recommending use of cloth face coverings in addition to physical distancing for essential activities and other public health hygiene practices. This does not include surgical and N95 masks, which should be reserved for first responders and medical workers.
- Beverly Hills City Council decided in favor of Metro's closure request of Wilshire Boulevard to help speed up construction of the Wilshire/Rodeo Station for the Purple Line Extension of the subway. The closure will allow Metro's contractors to complete decking for the Wilshire/Rodeo station sooner than expected and will help us minimize future construction impacts to local businesses as they struggle to overcome the impacts of the COVID-19 health crisis.
- For a list of confirmed cases of COVID-19 among Metro employees, contractors and vendors, check this page. The page will be updated every 24 hours.

UPDATE, April 1, 2020:

- April Regional Service Council meetings have been cancelled. We plan to resume them in May.
- NextGen Bus Plan public hearings postponed until July at the earliest. Explore the Plan by visiting the NextGen Virtual Workshop. We welcome your comments via email to nextgen@metro.net.
- Metro's law enforcement partners, the nonprofit PATH (People Assisting the Homeless) and Metro's private security personnel will be conducting assessments of riders at some of our busier transit hubs. The purpose of the assessments is to educate all riders on the importance of limiting travel to essential activities and to try to connect vulnerable and unhoused individuals to shelter beds. No one will be asked any travel details or be required to leave the system.

UPDATE, March 31, 2020:



UPDATE, March 30, 2020:

- To allow for greater social distancing in the workplace, Metro will be implementing the following adjustments to our customer support departments beginning Monday, March 30, 2020 until further notice.
  - All processing of paper reduced fare applications are suspended until further notice.
  - On-line reduced fare applications processing will continue.
  - Union Station East Portal and Wilshire/Vermont Customer Centers will remain open Monday through Friday from 10 a.m. to 2 p.m.
  - Baldwin Hills and East Los Angeles Center Customer Centers will remain open Tuesday through Saturday from 10 a.m. to 2 p.m.
  - Metro Lost and Found office will be closed. Lost items will be held until further notice.
  - Please use our online form to submit a claim.

essential resources, we would like to emphasize that if you are able to stay home, please do so and help us flatten the curve.

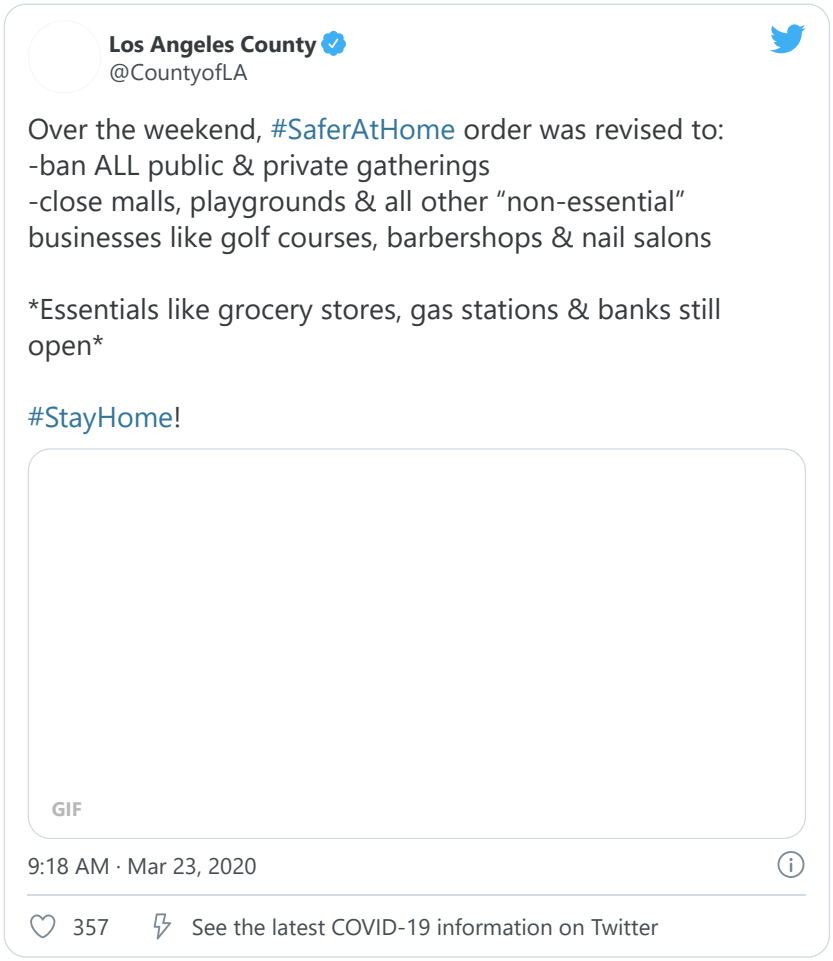
- Metro press briefing with CEO Phil Washington and other senior staff, click link to view.
- Please follow the state stay-at-home orders issued on March 19 by Gov. Gavin Newsom — Metro will remain in service for essential travel.
- Metro Bus service levels will be reduced 15 to 20 percent and we will try to strategically adjust select trips across the system to minimize inconvenience to riders and continue to provide good service on our busiest lines that riders depend on.
- Rail service will be adjusted as follows:
  - Starting tonight, March 20, and until further notice, last trips departing terminal stations will be at midnight on all trains. Metro Rail will run scheduled weekend service on Saturday and Sunday, with a weekday hybrid schedule on weekdays (see next item).
  - Starting Monday, March 23, trains on the B (Red), D (Purple), A (Blue), E (Expo) and L (Gold) Lines will run every 12 minutes between 6 a.m. and 6 p.m. with 20 minute service at all other times. D (Purple) Line trains will have four cars and B (Red) Line trains will have six cars in order for riders to maintain proper social distancing of six feet.
  - Starting Monday, March 23, the C Line (Green) will run every 12 minutes between 4 a.m. and 9 a.m., every 15 minutes until 3 p.m., every 12 minutes from 3 p.m. until 6 p.m. and then every 20 minutes between 6 p.m. until midnight.
  - In order to make final train connections of the night, we recommend making sure you are on the rail system no later than 10:30 p.m. If you require late night service, please consider the Owl Bus Network.
- Metro will be keeping an eye on ridership in the days ahead and may make other quick-strike adjustments to reflect current demand and deploy service to areas most in need. This means NexTrip and other trip planning apps may not have accurate arrival times. If you need assistance locating your bus, call 323.GOMETRO or message us on Twitter @metrolaalerts.
- Metro will begin installing sanitation stations and hand sanitizer dispensers at major transit stops and stations to allow riders to wash their hands, one of the best safeguards against the COVID-19 virus. Metro is also researching how to equip buses and trains with hand sanitizer dispensers to help control the virus.
- For additional information, please refer to our **FAQ.**

UPDATE: March 17, 2020

- **Metro COVID-19 FAQ**

The agency has strengthened cleaning at Union Station and major transit hubs. This includes an elevated focus on cleaning high touch point areas such as handrails, elevator call buttons, and ticket vending machines. Metro also continues to clean buses and trains at least once daily with EPA-approved disinfectants. We're reviewing cleaning protocols to ensure they are

the remainder of the bus. Metro also began rear-door only boarding and exiting on its bus system.



UPDATE, March 22, 2020:

- To assist with social distancing, all Metro Bus riders must board and exit through rear doors only. The front door will remain available to wheelchair riders and those who need the wheelchair ramp. Metro is also requiring all bus operators to use the transparent protective barrier that helps isolate them. While you are not expected to use the fare box or TAP validator at the front of the bus, please have a loaded TAP card with you during travel.
  - If you are using the bike rack, please let the bus operator know before exiting the bus — to give you time to get your bike off the rack at the front of the bus.
- We ask that all riders do their best to practice social distancing once aboard the bus — that is, spread out and try to stay at least six feet from other riders. With many people staying home from work, there is much more room on our buses for social distancing.

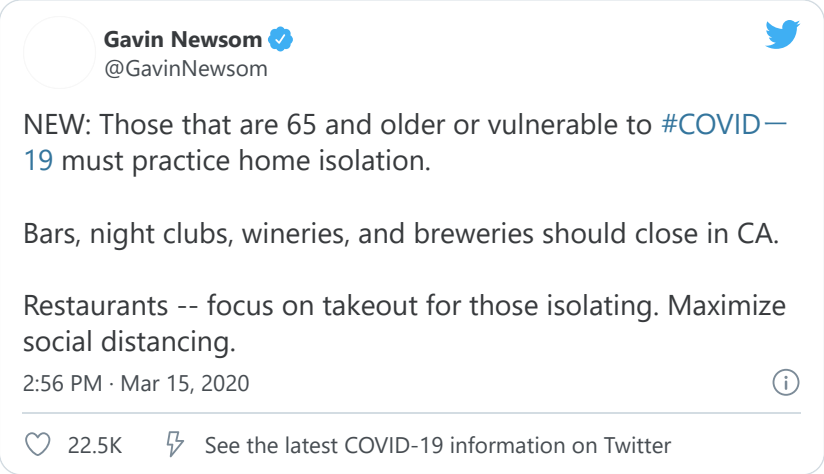
UPDATE, March 20, 2020:

- *Metro would like to extend a huge thank you to our front line staff who have selflessly kept our buses and trains rolling this week, and to all riders using Metro. While we will continue to operate service for those who rely on public transportation to access health care, food, and other*

up-to-date as the current situation evolves. In addition, Metro is producing signage and written materials on what customers can do to reduce the risk of being exposed to the virus.

Best practices include:

- Wash your hands frequently with soap and warm water. Hand washing tips from the CDC are here.
- Stay home if you are able to do so.
- Cough or sneeze into your elbow or use a tissue.
- Make sure you are using a robust, regular cleaning schedule for frequently touched surfaces such as cell phones and computers.



UPDATE, March 13, 2020:

- Amtrak reports passenger that traveled through Union Station may have tested positive for COVID-19.

UPDATE, March 12, 2020:

- Metro has postponed all public events at Union Station for the next 30 days.

L.A. County residents, students, workers and visitors are encouraged to practice good public health hygiene, as this is also the height of flu season. Best practices include:

- Wash your hands frequently with soap and warm water. Hand washing tips from the CDC are here.
- Stay home if you're sick.
- Cough or sneeze into your elbow or use a tissue.
- Make sure you are using a robust, regular cleaning schedule for frequently touched surfaces such as cell phones and computers.

Check publichealth.lacounty.gov (http://www.publichealth.lacounty.gov/media/Coronavirus/) for updates or more information. This article at Vice (https://www.vice.com/en_us/article/z3bw85/dont-let-coronavirus-scare-you-away-from-public-transit) also explains why you shouldn't fear going out in public or using transit.

Metro takes our role in supporting regional mobility and operating services seriously. We have previously dealt with similar public health situations before, including influenza, SARS and H1N1, and will draw on past experiences to inform our response going forward. Metro will continue to ensure that our system remains as safe and clean as possible.

Related



Metro rolling out additional service adjustments on select bus lines starting Monday, July 27
July 24, 2020
In "Transportation News"



Schedule change for Metro buses and trains begins this Sunday, April 19
April 14, 2020
In "Go Metro"

Bus detours expected in downtown Los Angeles for May Day on Tuesday
Metro Bus service will experience detours in downtown Los Angeles on Tuesday, May l due to planned marches for National May Day Protest. Metro plans to run regular Metro Bus and Metro Rail
April 30, 2012
In "Service Alerts"

CATEGORIES: Go Metro (https://thesource.metro.net/category/lifestyle/go-metro-lifestyle/), Policy & Funding (https://thesource.metro.net/category/policy_funding/), Transportation Headlines (https://thesource.metro.net/category/transportation-news/transportation-headlines/)

TAGGED AS: buses (https://thesource.metro.net/tag/buses/), CDC (https://thesource.metro.net/tag/cdc/), cleaning (https://thesource.metro.net/tag/cleaning/), coronavirus (https://thesource.metro.net/tag/coronavirus/), COVID-19 (https://thesource.metro.net/tag/covid-19/), hand washing (https://thesource.metro.net/tag/hand-washing/), L.A. County Department of Public Health (https://thesource.metro.net/tag/l-a-county-department-of-public-health/), public health (https://thesource.metro.net/tag/public-health/), rail cars (https://thesource.metro.net/tag/rail-cars/)



UPDATED: March 3, 2020

As many people are already aware, an outbreak of COVID-19, also known as coronavirus, has disrupted daily life in many places across the globe. The Los Angeles County Department of Public Health has declared a local and public health emergency in response to increased spread of coronavirus across the country and six additional cases in L.A. County.

From their press release (http://www.publichealth.lacounty.gov/phcommon/public/media/mediapubhpdetail.cfm?prid=2248):

> *Public Health stated that none of the new cases are from community spread, and all of these new cases were exposed to COVID-19 through close contacts. None of these cases were linked to the first case reported in LA County in January.*

Metro is being proactive and has formed a Contagious Virus Response Task Force that is closely coordinating with the L.A. County Department of Public Health (http://www.publichealth.lacounty.gov/media/Coronavirus/) and the U.S. Centers for Disease Control and Prevention (https://www.cdc.gov/coronavirus/2019-ncov/community/index.html) to ensure an appropriate response to the coronavirus. There is no indication at this time that there is any increased risk to people riding our buses, trains and bikes.

The agency has strengthened cleaning at Union Station and major transit hubs. This includes an elevated focus on cleaning high touch point areas such as handrails, elevator call buttons, and ticket vending machines. Metro also continues to clean buses and trains at least once daily with EPA-approved disinfectants. We're reviewing cleaning protocols to ensure they are up-to-date as the current situation evolves. In addition, Metro is producing signage and written materials on what customers can do to reduce the risk of being exposed to the virus.

We can't ***stress enough*** that we need the public's help to keep our system clean and safe.

49 replies ›

It does not help when Metro has homeless people constantly on the trains and refusing to move. They are unclean and urinate and defecate on the trains. You could start by somehow removing such people that carry germs and smell up the train cars.

Loading...

I totally agree with Rick Beaver.....the homeless situation on the trains is horrible. I do not feel safe. Either they are mentally abusive or they smell so bad I have to try several cars before I find one I can breath in. The police do not ride the trains and police the aisles....they just take the train to get to the next platform where they just stand for awhile till they go to the next platform. Also I no longer see undercover police on the trains. They have gone from bad to worse, especially the Blue Line. Now with the Coronavirus threat I will definately have to go back to driving.

Loading...

Well, that's a completely unrelated topic since the 'germs' you say they are carrying are not COVID-19, but thanks for showing your true colors and lack of empathy for the underprivileged and mentally ill on this online forum.

Loading...

Everyone deserves to be treated with decency and respect. If you are a frequent rider, you know that Metro is extremely negligent in how it handles issues that occur within the train. The problems on the Metro continue to worsen on a daily basis. I don't have problems with homeless people using the train, but I do have problems with people smoking weed, using drugs, and creating filth on the train. It endangers the health of everyone on the train.

Loading...

Use your brain, seriously. Ignorance like yours is what fuels a pandemic. It is DIRECTLY related. Lack of hygiene, cleanliness and basic handwashing is what spreads COVID-19.

Loading...

I agree with all here. The trains are disgusting due to homeless people using as a hotel. I think Metro police should ask for cards to see if people have paid to ride. I catch the gold line in Little Tokyo and count the amount of people that tap vs. the ones that don't (for one person that taps, at least 25 don't). I blame it on Metro for not installing turnstiles at all stations. I know that the thugs will still get in without paying but at least the turnstile will be somewhat of a deterrent for some.

Loading...

Metro thinks they are being compassionate by not doing anything, but they are actually enabling the situation, and yet, the honest people are being ticketed while the homeless don't have to pay, I passed out Winter Shelter Info this winter on the trains and I didn't
t see any of these homeless advocates out there, I was totally alone in the effort, and was not getting paid, nevertheless, many of the homeless didn't want the information, some don't want help, when some really did, and was thankful...

Loading...

We feel unsafe seating on dirty seats (they should be replaced and fabric should be completely removed as it absorbs dirt and smells bad and then we seat on that). Yes, there are so many homeless sneaking on the trains. There should be cameras everywhere and EVERYTHING should get cleaned and sanitized to prevent CoronaVirus spread. Better to prevent now than to deal with the consequences later.

Loading...

At the very least, we need to resume sweeping trains at the end of the line instead of putting them on for service immediately. Even if it requires another train in service, get everyone off the train at the end of the line so germs can't fester in one spot.

Loading...

Unless the way buses were cleaned when I worked at the RTD/MTA has not changed there is little cleaning except the blowing out of debris at the Fuel Station. The wiping down and mopping is only performed on a limited amount of buses during the day by Service Attendants mid day when there are few buses in need of fueling. Although the majority of contamination is the result of homeless persons riding the bus there are regular passengers as well who do not exercise healthy daily care of themselves.

Perhaps the MTA should adopt a policy not to heat the buses and trains plus secure all the windows in the open position. This was the policy they used at Fort Ord

during the Spinal Meningitis epidemic there in the late 1960's. We certainly were not comfortable especially at night but the occurrence of the disease was stymied.

Loading...

> To repeat: the buses are cleaned before they go into service. It's simply not practical to wipe a bus down every time someone gets on or off. Even if we wiped down the buses several times a day, we would still tell riders the same thing the health department is telling us: the best and most effective way to prevent corona from spreading is to have people wash their hands frequently and to avoid touching their face (especially mouth, nose and eyes).
>
> And this: I reject the notion that everything was always done better in the past. Sure, sometimes. Always? Nope.
>
> Steve Hymon
> Editor, The Source

Loading...

> I never said it was done better in the past. What I reported was how it was done in the past and believe nothing has changed. You're getting a little defensive unnecessarily.

Loading...

Let me tell you a story (Finish your meal before proceeding): I once hopped on a 704 Rapid bus heading EB starting at 4th/Santa Monica, it was 60ft NABI articulated bus, and proceeded to seat on the last forward facing seat on the bus (right under rear headsign). Once the bus got closer t the 405, I noticed there was more people aboard, notice the left most rear seat of the bus was open so I proceed to walk towards the seat only to find. . . DRY VOMIT all over that seat and Window.

That was just. . . bad, I immediately got off the bus and got on the next one.

What angered me the most from that experience was the fact that it was dry vomit, not wet, dry. That means that the bus must've done at least 2 runs with that vomit just laying there.

You guys have up to this point refused to take the proper actions because "the virus isn't in LA county," which is by far just a pathetic exc. . . *sigh*

Just please answer me this Metro: If you guys allow a bus that's been exposed to Vomit continue making runs, why should we really trust you guys?? Honest question.

Loading...

Hi Jose,

First, very sorry about that experience. Not what anyone wants, obviously.

Second, do you know if anyone reported it to the bus operator? That is the kind of situation in which we would get the bus clean as soon as possible.

Thanks,

Steve Hymon
Editor, The Source

Loading...

The bus should have been changed off ASAP>

Loading...

> That was pretty much my thought. This bus should've been taken out of service even well before I became aware of it. It could've been someone with the Norovirus at worst.
>
> Steve,
>
> This was anywhere between 12-18 months ago, I recall reporting it but I couldn't remember the last 2 digits of the the bus. I just remembered it was between the 9270s-9290s, that I do recall. And it was probably around 7:30pm when I first caught the bus.

Loading...

> > There's this thing called a wetvac.
> >
> > It can clean up messes such as vomit in less than three minutes.
> >
> > It costs considerably less than taking a bus out of service, which would also affect commuters trying to get home or to work.
> >
> > Perhaps the best way to handle such issues is to notify the operator.

Loading...

> > > Umm, that's the thing: That shouldn't be the case at all. Like I said it was dry, which meant it had been there for hours and the operator should've already had known had they actually done a walk down on the bus.

> Also, truth be told, many operators just don't care, and that's a fact. They see dry puke and their first thought is most likely going to be "they don't pay me enough to clean that," so at that point taking the bus out of service and affecting commuters for the sake of safety would've been the right thing to do.

Loading...

As one who goes through Crenshaw Station on the C (Green) line nearly every weekday, there's no way those elevators are cleaned every day: the dirt is the same shape it's been for months. I get that folks use it as a loo many times a day (thus the near constant aroma of urine, etc). This does not explain the fossilized filth.

Loading...

I have ridden the full length of the Blue Line with pools of vomit, fecal matter and urine in the train...at 5:45am in the morning before full rush hour even started! Not to mention urine and fecal matter spotted on the platforms as well. I have seen men urinating in the corners of the train and directly on the cloth seats. The last time I saw a Metro staff member "cleaning the train," they were walking through with a squirt bottle and randomly spraying it here and there. No consistency, no thorough scrubbing or wiping. I do not feel assured one bit from this statement and dramatized ad from Metro.

Loading...

I'm sorry, but I think I'll be going back to driving and Uber/Lyft on work days, and I'll stick to Big Blue Bus on days I have class. Unlike the Red/Expo Line, the buses on BBB are actually clean. No homeless, no dirty seats and poles, and no inconsiderate drivers. It's a shame the Rapid 7 doesn't run late anymore but as per usual, Metro's incompetence has lead to this. I'll change my school and work schedule appropriately, which I'm glad I have the privilege to do as such.

Go ahead, continue to ignore the homeless and bodily fluid complaints, but they won't go away without addressing the situation.

Loading...

> Metro it's true changes need to be made the big blue buses are cleaned entirely everyday and mopped why is it so hard to do would you check into a hotel that's cleaned every 3 months like your buses are scheduled for scrubs

Loading...

There needs to be proper fare enforcement, most of the people causing problems are probably the one's who are riding for free. I haven't had my tap card checked on 18 months. The early train from Santa Monica, 6.00 am has mainly homeless people on it who use it as a hotel. Last week a homeless person on the Expo train from downtown LA was coughing for the entire journey without covering his mouth. I'll probably start driving to work soon as the corona virus situation will get worse. You need to check who is actually riding these trains, plus the amount of money being lost must be astronomical.

Loading...

> Completely agree with this. Proper and strict fare enforcement should help reduce the number of troublemakers (likely riding for free) whose presence annoy and/or threaten the safety of other law-abiding riders, and otherwise take up space that should be reserved for paying customers. Also would like to see regular sweeps at the end of the line to remove/discourage those who are using the trains as mobile shelters.

Loading...

> > Here's what I didn't like about the constant fare enforcement:
> >
> > Several times, it holds up passengers trying to make a timely connection to get to work.
> >
> > Secondly, the aggressive fare enforcement was enacted primarily on days/nights of inclement weather– rain, low-to-freezing temperatures, etc.
> >
> > I'm pretty convinced that if homeless people had someplace else to go, they would. And since we obviously don't want them on the buses, what solutions are we ready to propose?

Loading...

I can't even see you guys f$&@ seriously?
I'm a new Yorker living here now 8 years and although I have a lot to say I'm shocked that you ONLY CLEAN THE BUSES ONCE A DAY however you are saying you need the public help and instructing us to HAVE A ROBUST CLEANING CLEANING SCHEDULE FOR FREQUENTLY TOUCHED SURFACES BUT METRO ONLY CLEANS ONCE A DAY?

I have been assaulted on the bus, I've seen sexual advances, waste and human soil on my regular 720 line the SAME CRAP STAINS Soil that bus for weeks THIS IS A SHAM I GUESS NEXT YOU WANT THE PAYING LAWFUL RIDERS TO START CLEANING AND DISINFECTING THE TRAIN 😕 you allow people to get on with up

to 6 bags of waste and trash and recycling etc what you should offer is a program where homeless people can help clean the trains build showers for them mental heath services at your employees facilities etc because you do not in enforce ridership rules on this Vulnerable Population however it's still not fair to the rest of us I digress because this is not about homelessness it's ABOUT YOUR TIPID RESPONSE TO CORNAVIRUS and ARROGANCE TO SUGGEST THE PUBLIC HAVE A ROBUST CLEANING SCHEDULE BUT METRO WITH 200,000 PEOPLE A DAY TOUCHING SERVICES ONLY CLEANS ONE AGAIN 🤦‍♀️ 🤦🏽‍♂️ 🤦‍♂️ 🤦🏾‍♀️ IM RIDING THE BUS/SUBWAY TODAY Let's see how long this ONCE A DAY cleaning is working out will take 📸 #LAMETRONEEDSTOSMELLTHEBUS

Loading...

They didn't post my comments

Loading...

I do see this at 7th/Metro and Santa Monica during the day. At night that's a different story though. Catching the train after 10pm at Union Station is essentially a rolling tent and no one in sight to remove everyone sleeping off the train. You can't exactly expect an increasing in night time ridership to boost with A) trains every 20 min with mismatched transfers, B) decrease in capacity 3 to 2 car trains and packing everyone in a train, especially during a pandemic (really?) and C) just outright poor hygiene at night.

This is why I'm avoiding Metro by all means and sticking to BBB and Uber/Lyft for now. At least my Lyft rides smell like Lysol every time I ride on one.

Loading...

With the Coronavirus spreading so rapidly and now a death in Los Angeles County it's time the MTA and the other carriers become pro-active and address the crisis forcefully. Every bus terminal (end of the line) should be manned by one or more Service Attendants that will clean every bus or train prior to its departure on its next trip. If only one line is at a terminal, those buses should be detoured to the nearest multi line terminal for cleaning and its schedule adjusted. It's very apparent this virus will not go away in a short time. Others are being pro-active, our countries public transit must respond appropriately.

In addition to the cleaning, every bus operator should be mandated to close their security panel separating them from the passengers. Where panels have not been installed as of yet a stepped up retro fit on the week-ends should be initiated.

Loading...

There is no open window available inside the train and some of the newer buses. Besides the frequent cleaning, the virus would still spread around when air is not circulated. I am not sure how often do Metro clean and change the air filter but most of the time the A/C has some smells, and turning the A/C unit on may not prevent them either. No open window poses a threat to riders when smoke occurs inside the train and bus with windows down. I don't see how could we feel safe when riding public transportation.

Loading...

How about you volunteer to help with this?

Loading...

TIME TO BAN UBER SCOOTERS!!!

Loading...

A non-bus related COVID-19 issue: Metro should consider relating the subsidy requirements for vanpools during this public health emergency, as ridership (both number of riders, and number of days a van operates) will be down due to remote work requirements and self-isolation. Subsidies can be the difference in a vanpool surviving financially or not.

Loading...

there is sometimes no need to homeless to ride to bus just to move to a different part of the city, if they are clean that's ok but some smell really bad and left the bus with the small for quite some time. They are also very dirty

Loading...

Metro MTA needs to "Close Their Doors" on all Buses & Rail Trains to the public until the COVID-19 Virus Disease Passes to protect the Public, Bus & Rail Operaters !!!

Loading...

> Hi,
>
> Many people — including health care workers and first responders — rely on public transportation to access jobs, food, care and other essential resources. We will remain in service until told otherwise by public health officials. Please read the

> remainder of the post to see the measures we are taking to keep our system clean and safe. Thank you.
>
> Anna Chen
> Writer, The Source
>
> Loading...

I agree 💯. But since we know they won't do that, metro MTA should at the least provide gloves and mask for their operators. In particular, the bus operators who are so expose to the public.

Loading...

I ride the A (Blue) Line from start to finish each workday and I can tell you the MTA doesn't care about our health or safety. When I get on the train on 1st street, I am routinely the only person who swipes his card because most of the other riders are the homeless! I don't know why there are no officers checking riders? The homeless are not clean, let's just be honest and you can best bet many of them have Coronavirus and spreading it via public transportation. But the MTA doesn't care because I bet most of the big wigs don't take public transportation themselves so who cares right?

Loading...

This is true. Metro don't care and will never do anything about that homeless situation on public transportation. So long as the government keeps giving them that check ANYONE, and I do mean ANYONE! can ride their trains or buses. They give their bus operators a hard time! The bus operators are dehumanized. Not one word out to their operators per division about this coronavirus. My friend told me that yesterday was the first time he/she got info as to where to check online about metro's intentions. They never made an announcement or anything to their bus operators. They have them out there with no gloves and no mask.They don't care about the public or their operators. They treat there operators like crap. Which is crazy since the operators are the back bone of the company.

Loading...

Unfortunately, metro does Not care! The big wigs do not ride the system ,metro provides personal vehicles for them to drive around. The mayor of LA holds three seats at the a metro board of directors and could do more if he wanted to

Loading...

Hi So sad;

Executive staff are not given personal vehicles by Metro. We do have fleet cars that staff can use for the kind of work trips that are difficult via transit but staff who commute via car almost always use their own cars.

Steve Hymon
Editor, The Source

Loading...

Yes, there is a lot we don't know about the coronavirus. If you look back and learn from the lessons of history, the world has encountered disease outbreaks with the likes of cholera, measles, bubonic plague, leprosy, polio, HIV/AIDS, MERS, SARS, avian flu, and much more. There were periods where we did not know as much about them as we do today. Not to mention, the world has faced other trials and tribulations before. Some include: The Great Depression, the stock market crash of 1929, two world wars, and September 11. We must never give in to xenophobia and ignorance. Else, that brews blame, bigotry, and hate. We, as human beings, are much better than that. Be informed. Help out your fellow brothers and sisters in times of need. A shimmering light will appear in our darkest hour. Like the mythical phoenix that rises out of the ashes, we, too, will rise and overcome this crisis. Place your trust in God alone. He is sovereign.

Loading...

Unfortunately I do not believe MTA and what they say. I have ridden the Blue Line for 10 years but just started driving today. I do not feel the train is clean and safe at all! When I first started riding the train the Sheriffs were responsible for policing the line and there were fare checkers and Sheriffs as well at transfer points at Willowbrook and they rode the trains and randomly checked passenger fares. Then the contract was given to LAPD because MTA said the Sheriffs were not doing a good job……All I see now are LAPD on the platforms. The only time they are on the trains is to go to the next platform. They do not check fares. There are no longer fare checkers as well. It has been two years since my fare has been checked. Like Mark says I am one of the few who taps my card…Most just blow by because no one is checking. I am done…… I have written to MTA and do not get responses or I get the canned responses I see from the Source writers. Good luck MTA with making any money when the people that pay are no longer riding.

Loading...

My father works for the MTA, he's 64 years of age and a few years ago had a heart attack. He is a high risk for contracting this virus. I am afraid for his life. He does

not have any sick days remaining and he does not want to call out. What can he do? Can he take leave without pay? My whole family is terrified for him. If you could please offer any advice or help, we would greatly appreciate it.

Loading...

> Hi Jessica,
>
> At this time we highly encourage your father to speak to his direct supervisor about these concerns to explore what options are available. Metro has also sent out an employee FAQ, which is posted on the employee intranet and at divisions, which may be able to provide some guidance. We hope this is helpful and hope you and your family stay safe.
>
> Thank you,
>
> Anna Chen
> Writer, The Source
>
> Loading...

Any mass public transportation (buses, trains, etc.) is a germ incubator. There is a push from several groups to try to push Californians out of their cars – more paid car pool lanes, added fees & taxes for driving, an so on. These groups will not tell the public to avoid public transportation because it ruins their narrative and goals. They put that ahead of public safety. Here's a fact though. If I drive alone in my car somewhere, there is zero chance of me catching COVID-19 from someone else. If I go on public transportation, all bets are off. Be smart, drive alone in your car, and pressure government representatives to issue a "do not use public transportation" warning until this is over.

Loading...

> Hi John Doe;
>
> With all due respect, I don't think driving means zero chance of contracting COVID-19 or anything else. At some point, you will likely depart your car and there is always the chance of catching something. Even outside the current pandemic, we think the chance of contracting anything can be reduced to reasonable levels by following best practice hygiene levels, including frequent hand washing.
>
> Steve Hymon
> Editor, The Source
>
> Loading...

I purchased a 30 day pass last week but my office has been shut down due to the coronavirus indefinitely. Is there any way to get a refund or have there be a hold on the pass until things settle down? I would hate for my $100 to go to waste.

Loading...

> Hi Janette,
>
> At this time we're asking pass holders to hang on to their passes until their daily commutes are back to normal. Once you start riding again, affected customers can call 866-TAPTOGO and we will add the additional days to their TAP cards. If you had additional questions or concerns please email CustomerService@taptogo.net (mailto:CustomerService@taptogo.net)
>
> Thanks,
>
> Anna Chen
> Writer, The Source
>
> Loading...

EXHIBIT B

Effective July 27 2020

20

Service Change
Cambio de Servicio

Beginning July 27, 2020

Additional evening weekday trip on Line 20

A partir del 27 de julio, 2020

Viaje adicional entre semana por la tarde en la Línea 20

metro.net
323.GO.METRO

Travel Info
511

Wheelchair Hotline
800.621.7828

California Relay Service
711

Subject to change without notice
Sujeto a cambios sin previo aviso

Metro®

Beginning Monday, July 27, 2020, Line 20 will begin operating an additional afternoon trip in the westbound direction to help balance passenger loads. The additional service will operate on weekdays only. The added trip start time are as follows:

A partir del lunes 27 de julio del 2020, la Línea 20 empezara a proveer un viaje adicional por la tarde en dirección al oeste. Este viaje adicional ayudara a balancear la cantidad de pasajeros haciendo viajes esenciales. Los viajes agregados trabajarán solo de lunes a viernes. El horario de salida del viaje nuevo es el siguiente:

Westbound Departure Times (*Horario de salida hacia el oeste*): 7th & Maple to Wilshire & Westwood

Westbound *Al Oeste* (Approximate Times/*Tiempos Aproximados*)

7th & Maple	Wilshire & Alvarado	Wilshire / Vermont Station	Wilshire & Crenshaw	Wilshire & Fairfax E	Wilshire & Santa Monica	Wilshire & Westwood D	Wilshire & 14th	5th & Colorado
6:15P	6:33P	6:40P	6:48P	7:04P	7:19P	7:30P	—	—

Although this trip will be scheduled for weekday operation, please note that trips may not appear on Metro Trip Planner, NextBus, Google or other transit feed sources.

For all other scheduled trips seven days a week, please see the Sunday section of Line 20 timetable. For the latest information, please visit www.metro.net or contact Customer Service at (323) GO.METRO.

Aunque esto viaje serán proveídos entre semana, tenga en cuenta que los viajes pueden no aparecer en Metro Trip Planner, NextBus, Google o otras medios de información de tránsito.

Para todos los demás viajes programados los siete días de la semana, por favor consulte los horarios de domingo de la Línea 20. Para la información mas reciente, por favor visite www.metro.net o comuníquese con Servicio al Cliente al (323) GO.METRO.

EXHIBIT C

Monday through Friday

Effective Jul 27 2020

20

Eastbound *Al Este* (Approximate Times/*Tiempos Aproximados*)

SANTA MONICA		WESTWOOD	LOS ANGELES				
1	2	3	5	6	7	8	9
5th & Colorado	Wilshire & 14th	Wilshire & Westwood D	Wilshire & Fairfax	Wilshire & Crenshaw	Wilshire / Vermont Station	Wilshire & Alvarado	7th & Main
5:02A	5:09A	5:20A	5:37A	5:44A	5:53A	5:57A	6:07A
5:26	5:33	5:44	6:02	6:10	6:19	6:23	6:33
5:50	5:57	6:08	6:26	6:34	6:43	6:48	6:59
6:13	6:20	6:31	6:50	6:58	7:07	7:12	7:24
6:37	6:44	6:56	7:15	7:22	7:31	7:36	7:49
7:00	7:07	7:19	7:38	7:46	7:55	8:00	8:14
—	—	7:38	7:58	8:07	8:19	8:25	8:39
—	—	7:59	8:21	8:30	8:42	8:48	9:02
—	—	8:21	8:43	8:53	9:05	9:11	9:25
—	—	8:45	9:07	9:16	9:28	9:34	9:50
—	—	9:02	9:24	9:33	9:46	9:52	10:08
—	—	9:19	9:41	9:51	10:04	10:10	10:26
—	—	9:36	9:58	10:08	10:21	10:27	10:43
—	—	9:52	10:14	10:24	10:37	10:43	10:59
—	—	10:08	10:30	10:40	10:53	10:59	11:15
—	—	10:20	10:44	10:54	11:08	11:14	11:30
—	—	10:35	10:59	11:09	11:23	11:29	11:44
—	—	10:50	11:14	11:24	11:38	11:44	11:59
—	—	11:03	11:29	11:39	11:53	11:59	12:16P
—	—	11:18	11:44	11:54	12:08P	12:14P	12:31
—	—	11:32	11:58	12:09P	12:23	12:29	12:46
—	—	11:47	12:13P	12:24	12:38	12:44	1:01
—	—	11:59	12:28	12:39	12:53	12:59	1:16
—	—	12:15P	12:43	12:54	1:08	1:14	1:31
—	—	12:30	12:58	1:09	1:23	1:29	1:46
—	—	12:45	1:13	1:24	1:38	1:44	2:01
—	—	1:02	1:28	1:39	1:53	1:59	2:16
—	—	1:17	1:43	1:54	2:08	2:14	2:31
—	—	1:32	1:58	2:09	2:23	2:29	2:46
—	—	1:47	2:13	2:24	2:38	2:44	3:01
—	—	2:02	2:28	2:39	2:53	2:59	3:16
—	—	2:17	2:43	2:54	3:08	3:14	3:31
—	—	2:31	2:58	3:09	3:23	3:29	3:44
—	—	2:46	3:13	3:24	3:38	3:44	3:59
—	—	3:00	3:27	3:39	3:53	3:59	4:14
—	—	3:16	3:43	3:55	4:08	4:14	4:29
—	—	3:32	3:58	4:10	4:23	4:29	4:44
—	—	3:47	4:13	4:25	4:38	4:44	4:59
—	—	4:01	4:28	4:40	4:53	4:59	5:11
—	—	4:15	4:42	4:54	5:08	5:14	5:29
—	—	4:31	4:57	5:09	5:23	5:29	5:43
—	—	4:46	5:12	5:24	5:38	5:44	5:58
—	—	5:03	5:28	5:39	5:53	5:59	6:11
—	—	5:19	5:44	5:55	6:08	6:14	6:27
—	—	5:34	6:00	6:10	6:23	6:29	6:41
—	—	5:49	6:15	6:25	6:38	6:44	6:57
—	—	6:04	6:30	6:40	6:53	6:59	7:12
—	—	6:19	6:45	6:55	7:08	7:14	7:26
—	—	6:36	7:02	7:12	7:25	7:31	7:44
—	—	6:57	7:22	7:32	7:45	7:50	8:01
—	—	7:23	7:45	7:55	8:07	8:12	8:24
—	—	7:48	8:10	8:20	8:32	8:37	8:48
—	—	8:13	8:35	8:45	8:57	9:02	9:13
—	—	8:40	9:02	9:11	9:23	9:28	9:39
—	—	9:10	9:30	9:38	9:50	9:55	10:05
—	—	9:39	9:59	10:07	10:19	10:24	10:34
9:49P	9:56P	10:09	10:28	10:36	10:48	10:53	11:03
10:22	10:29	10:41	11:00	11:08	11:18	11:23	11:33
10:52	10:59	11:11	11:30	11:38	11:48	11:52	12:02A
11:25	11:32	11:44	12:02A	12:08A	12:18A	12:22A	12:32
12:01A	12:08A	12:20A	12:38	12:44	12:53	12:57	1:07
12:34	12:41	12:52	1:09	1:15	1:23	1:27	1:37
1:04	1:11	1:22	1:39	1:45	1:53	1:57	2:07
1:34	1:41	1:52	2:09	2:15	2:23	2:27	2:37
2:04	2:11	2:22	2:39	2:45	2:53	2:57	3:07
2:34	2:41	2:52	3:09	3:15	3:23	3:27	3:37
3:04	3:11	3:22	3:39	3:45	3:53	3:57	4:07
3:34	3:41	3:52	4:09	4:15	4:23	4:27	4:36
4:04	4:11	4:22	4:39	4:45	4:53	4:57	5:06
4:34	4:41	4:52	5:09	5:15	5:23	5:27	5:36

Westbound *Al Oeste* (Approximate Times/*Tiempos Aproximados*)

LOS ANGELES					BEVERLY HILLS	WESTWOOD	SANTA MONICA	
10	8	7	6	5	4	3	2	1
7th & Maple	Wilshire & Alvarado	Wilshire / Vermont Station	Wilshire & Crenshaw	Wilshire & Fairfax E	Wilshire & Santa Monica	Wilshire & Westwood D	Wilshire & 14th	5th & Colorado
4:13A	4:23A	4:27A	4:33A	4:39A	4:49A	4:55A	5:04A	5:12A
4:45	4:55	4:59	5:07	5:14	5:24	5:31	5:41	5:49
5:12	5:22	5:26	5:34	5:42	5:52	5:59	6:09	6:17
5:32	5:42	5:46	5:54	6:02	6:15	6:24	6:34	6:42
5:51	6:01	6:07	6:15	6:26	6:39	6:48	6:59	7:07
6:09	6:21	6:27	6:36	6:47	7:00	7:10	—	—
6:28	6:41	6:47	6:56	7:08	7:22	7:32	—	—
6:47	7:00	7:06	7:15	7:27	7:41	7:51	—	—
7:03	7:19	7:25	7:34	7:46	8:00	8:10	—	—
7:22	7:38	7:44	7:53	8:06	8:21	8:31	—	—
7:40	7:56	8:02	8:11	8:25	8:40	8:51	—	—
7:57	8:14	8:20	8:30	8:44	8:59	9:10	—	—
8:13	8:30	8:36	8:46	9:00	9:15	9:26	—	—
8:28	8:45	8:51	9:01	9:15	9:30	9:41	—	—
8:43	9:00	9:06	9:16	9:30	9:45	9:56	—	—
8:58	9:15	9:21	9:31	9:45	10:00	10:11	—	—
9:14	9:30	9:36	9:47	10:02	10:18	10:29	—	—
9:27	9:45	9:51	10:02	10:17	10:33	10:44	—	—
9:42	10:00	10:06	10:17	10:32	10:48	10:59	—	—
9:57	10:15	10:21	10:32	10:47	11:03	11:14	—	—
10:11	10:29	10:36	10:47	11:02	11:18	11:29	—	—
10:26	10:44	10:51	11:02	11:17	11:33	11:44	—	—
10:41	10:59	11:06	11:17	11:32	11:48	11:59	—	—
10:56	11:14	11:21	11:32	11:47	12:03P	12:14P	—	—
11:11	11:29	11:36	11:47	12:02P	12:18	12:29	—	—
11:26	11:44	11:51	12:02P	12:17	12:33	12:44	—	—
11:41	11:59	12:06P	12:17	12:32	12:48	12:59	—	—
11:56	12:14P	12:21	12:32	12:47	1:03	1:14	—	—
12:11P	12:29	12:36	12:47	1:02	1:19	1:30	—	—
12:26	12:44	12:51	1:02	1:17	1:34	1:46	—	—
12:41	12:59	1:06	1:17	1:32	1:49	2:01	—	—
12:56	1:14	1:21	1:32	1:47	2:04	2:16	—	—
1:11	1:29	1:36	1:47	2:02	2:19	2:31	—	—
1:26	1:44	1:51	2:02	2:17	2:34	2:46	—	—
1:41	1:59	2:06	2:17	2:32	2:49	3:01	—	—
1:56	2:14	2:21	2:32	2:47	3:04	3:16	—	—
2:11	2:29	2:36	2:47	3:02	3:19	3:31	—	—
2:26	2:44	2:51	3:02	3:17	3:34	3:46	—	—
2:41	2:59	3:06	3:17	3:32	3:49	4:01	—	—
2:56	3:14	3:21	3:32	3:47	4:04	4:16	—	—
3:11	3:29	3:36	3:47	4:02	4:19	4:31	—	—
3:26	3:44	3:51	4:02	4:17	4:34	4:46	—	—
3:41	3:59	4:06	4:17	4:32	4:49	5:01	—	—
3:56	4:14	4:21	4:32	4:47	5:04	5:15	—	—
4:11	4:29	4:36	4:47	5:02	5:18	5:29	—	—
4:26	4:44	4:51	5:02	5:17	5:33	5:44	—	—
4:41	4:59	5:06	5:17	5:32	5:48	5:59	—	—
4:56	5:14	5:21	5:32	5:47	6:03	6:14	—	—
5:11	5:29	5:36	5:47	6:02	6:18	6:29	—	—
5:28	5:46	5:53	6:04	6:18	6:34	6:45	—	—
5:45	6:03	6:10	6:21	6:34	6:49	6:59	—	—
6:04	6:22	6:29	6:40	6:53	7:08	7:19	—	—
6:15	6:33	6:40	6:51	7:04	7:19	7:30	—	—
6:26	6:44	6:51	7:02	7:15	7:30	7:38	—	—
6:49	7:06	7:13	7:24	7:36	7:50	7:58	—	—
7:11	7:28	7:35	7:45	7:57	8:11	8:19	—	—
7:33	7:50	7:57	8:07	8:19	8:33	8:43	—	—
7:56	8:12	8:19	8:29	8:41	8:55	9:03	9:15P	9:23P
8:20	8:36	8:42	8:52	9:04	9:15	9:24	—	—
8:47	9:02	9:08	9:19	9:31	9:42	9:51	10:02	10:10
9:14	9:28	9:34	9:45	9:57	10:07	10:16	10:27	10:35
9:41	9:54	10:00	10:11	10:22	10:32	10:40	10:51	10:59
10:11	10:24	10:30	10:41	10:50	11:00	11:08	11:18	11:26
10:44	10:55	11:00	11:09	11:17	11:27	11:35	11:44	11:52
11:15	11:26	11:30	11:39	11:47	11:57	12:04A	12:13A	12:21A
11:48	11:59	12:03A	12:11A	12:17A	12:27A	12:34	12:43	12:51
12:18A	12:29A	12:33	12:41	12:47	12:57	1:03	1:12	1:20
12:48	12:59	1:03	1:11	1:17	1:27	1:33	1:42	1:49
1:18	1:29	1:33	1:41	1:47	1:57	2:03	2:12	2:19
1:48	1:59	2:03	2:09	2:15	2:24	2:30	2:39	2:46
2:18	2:29	2:33	2:39	2:45	2:54	3:00	3:09	3:16
2:48	2:59	3:03	3:09	3:15	3:24	3:30	3:39	3:46
3:18	3:29	3:33	3:39	3:45	3:54	4:00	4:09	4:16
3:48	3:59	4:03	4:09	4:15	4:24	4:30	4:39	4:46

Saturday, Sunday and Holiday Schedule

20

Eastbound *Al Este* (Approximate Times/*Tiempos Aproximados*)

SANTA MONICA		WESTWOOD	LOS ANGELES				
1	2	3	5	6	7	8	9
5th & Colorado	Wilshire & 14th	Wilshire & Westwood D	Wilshire & Fairfax	Wilshire & Crenshaw	Wilshire / Vermont Station	Wilshire & Alvarado	7th & Main
5:02A	5:09A	5:20A	5:37A	5:44A	5:53A	5:57A	6:08A
5:37	5:44	5:55	6:12	6:19	6:28	6:32	6:44
6:06	6:13	6:25	6:43	6:50	6:59	7:04	7:16
6:34	6:41	6:53	7:11	7:19	7:29	7:34	7:47
7:04	7:11	7:23	7:41	7:49	7:59	8:04	8:17
7:34	7:41	7:53	8:11	8:19	8:29	8:34	8:48
7:59	8:06	8:18	8:36	8:45	8:58	9:03	9:17
8:23	8:30	8:43	9:02	9:11	9:24	9:29	9:44
8:43	8:50	9:03	9:22	9:31	9:44	9:50	10:05
—	—	9:18	9:37	9:46	9:59	10:05	10:20
—	—	9:33	9:52	10:01	10:14	10:20	10:35
—	—	9:47	10:07	10:16	10:29	10:35	10:50
—	—	10:03	10:23	10:32	10:44	10:50	11:05
—	—	10:19	10:39	10:47	10:59	11:05	11:20
—	—	10:34	10:54	11:02	11:14	11:20	11:35
—	—	10:49	11:09	11:17	11:29	11:35	11:50
—	—	11:03	11:23	11:31	11:44	11:50	12:05P
—	—	11:17	11:37	11:46	11:59	12:05P	12:21
—	—	11:31	11:52	12:01P	12:14P	12:20	12:36
—	—	11:45	12:06P	12:16	12:29	12:35	12:51
—	—	12:01P	12:22	12:32	12:44	12:50	1:06
—	—	12:16	12:37	12:47	12:59	1:05	1:21
—	—	12:31	12:52	1:02	1:14	1:20	1:36
—	—	12:46	1:07	1:17	1:29	1:35	1:51
—	—	1:01	1:22	1:32	1:44	1:50	2:06
—	—	1:15	1:37	1:47	1:59	2:05	2:21
—	—	1:29	1:52	2:02	2:14	2:20	2:36
—	—	1:44	2:07	2:17	2:29	2:35	2:51
—	—	1:59	2:22	2:32	2:44	2:50	3:06
—	—	2:14	2:37	2:47	2:59	3:05	3:21
—	—	2:29	2:52	3:02	3:14	3:20	3:36
—	—	2:44	3:07	3:17	3:29	3:35	3:51
—	—	2:59	3:22	3:32	3:44	3:50	4:06
—	—	3:14	3:37	3:47	3:59	4:05	4:21
—	—	3:29	3:52	4:02	4:14	4:20	4:36
—	—	3:44	4:07	4:17	4:29	4:35	4:51
—	—	3:59	4:22	4:32	4:44	4:50	5:06
—	—	4:14	4:37	4:47	4:59	5:05	5:20
—	—	4:29	4:52	5:02	5:14	5:20	5:35
—	—	4:44	5:07	5:17	5:29	5:35	5:50
—	—	4:59	5:22	5:32	5:44	5:50	6:04
—	—	5:14	5:37	5:47	5:59	6:05	6:20
—	—	5:29	5:52	6:02	6:14	6:20	6:35
—	—	5:46	6:08	6:18	6:30	6:36	6:47
—	—	6:06	6:28	6:38	6:50	6:56	7:09
—	—	6:27	6:48	6:58	7:10	7:16	7:26
—	—	6:48	7:09	7:18	7:30	7:35	7:47
—	—	7:11	7:30	7:38	7:50	7:55	8:05
—	—	7:32	7:50	7:58	8:10	8:15	8:27
—	—	7:57	8:15	8:23	8:35	8:40	8:52
8:07P	8:14P	8:28	8:46	8:54	9:05	9:10	9:20
8:43	8:50	9:04	9:22	9:30	9:41	9:46	9:56
—	—	9:29	9:47	9:55	10:07	10:12	10:22
—	—	10:03	10:22	10:30	10:42	10:47	10:57
10:19	10:26	10:39	10:58	11:06	11:16	11:21	11:31
10:53	11:00	11:12	11:31	11:39	11:48	11:53	12:03A
11:26	11:33	11:45	12:03A	12:09A	12:18A	12:22A	12:32
11:59	12:07A	12:19A	12:37	12:43	12:52	12:56	1:06
12:33A	12:40	12:51	1:08	1:14	1:22	1:26	1:36
1:03	1:10	1:21	1:38	1:44	1:52	1:56	2:06
1:32	1:39	1:50	2:07	2:13	2:21	2:25	2:35
2:02	2:09	2:20	2:37	2:43	2:51	2:55	3:05
2:33	2:40	2:51	3:08	3:14	3:22	3:26	3:36
3:03	3:10	3:21	3:38	3:44	3:52	3:56	4:05
3:33	3:40	3:51	4:08	4:14	4:22	4:26	4:35
4:03	4:10	4:21	4:38	4:44	4:52	4:56	5:06
4:34	4:41	4:51	5:08	5:14	5:22	5:26	5:36

Westbound *Al Oeste* (Approximate Times / *Tiempos Aproximados*)

LOS ANGELES					BEVERLY HILLS	WESTWOOD	SANTA MONICA	
10	8	7	6	5	4	3	2	1
7th & Maple	Wilshire & Alvarado	Wilshire / Vermont Station	Wilshire & Crenshaw	Wilshire & Fairfax E	Wilshire & Santa Monica	Wilshire & Westwood D	Wilshire & 14th	5th & Colorado
4:16A	4:25A	4:30A	4:36A	4:43A	4:52A	4:58A	5:07A	5:15A
4:45	4:55	5:00	5:07	5:15	5:25	5:32	5:42	5:50
5:14	5:25	5:30	5:38	5:47	5:58	6:06	6:16	6:24
5:42	5:54	5:59	6:07	6:17	6:28	6:36	6:47	6:55
6:12	6:24	6:29	6:37	6:47	6:58	7:06	7:17	7:25
6:41	6:54	6:59	7:09	7:19	7:30	7:38	7:52	8:00
7:09	7:23	7:28	7:38	7:48	8:00	8:08	8:24	8:32
7:35	7:49	7:55	8:05	8:15	8:27	8:37	—	—
8:00	8:14	8:20	8:30	8:43	8:55	9:05	—	—
8:23	8:37	8:43	8:53	9:06	9:18	9:28	—	—
8:39	8:53	8:59	9:09	9:22	9:34	9:44	—	—
8:58	9:12	9:18	9:28	9:41	9:53	10:03	—	—
9:13	9:27	9:33	9:43	9:56	10:09	10:19	—	—
9:28	9:42	9:48	9:58	10:11	10:24	10:34	—	—
9:43	9:57	10:03	10:13	10:26	10:39	10:49	—	—
9:58	10:12	10:18	10:28	10:41	10:54	11:04	—	—
10:13	10:27	10:33	10:43	10:56	11:09	11:19	—	—
10:26	10:42	10:48	10:58	11:11	11:24	11:34	—	—
10:41	10:57	11:03	11:13	11:26	11:39	11:49	—	—
10:56	11:12	11:18	11:28	11:41	11:54	12:04P	—	—
11:11	11:27	11:33	11:43	11:56	12:09P	12:19	—	—
11:26	11:42	11:48	11:58	12:11P	12:24	12:34	—	—
11:40	11:57	12:03P	12:13P	12:26	12:40	12:50	—	—
11:55	12:12P	12:18	12:28	12:41	12:55	1:05	—	—
12:10P	12:27	12:33	12:43	12:56	1:10	1:20	—	—
12:25	12:42	12:48	12:58	1:12	1:26	1:36	—	—
12:40	12:57	1:03	1:13	1:27	1:41	1:51	—	—
12:55	1:12	1:18	1:28	1:42	1:56	2:06	—	—
1:10	1:27	1:33	1:43	1:57	2:11	2:21	—	—
1:25	1:42	1:48	1:58	2:12	2:26	2:37	—	—
1:40	1:57	2:03	2:13	2:27	2:41	2:52	—	—
1:55	2:12	2:18	2:28	2:42	2:56	3:07	—	—
2:10	2:27	2:33	2:43	2:57	3:11	3:22	—	—
2:25	2:42	2:48	2:58	3:12	3:26	3:37	—	—
2:40	2:57	3:03	3:13	3:27	3:41	3:52	—	—
2:55	3:12	3:18	3:28	3:42	3:56	4:07	—	—
3:10	3:27	3:33	3:43	3:57	4:11	4:22	—	—
3:25	3:42	3:48	3:58	4:12	4:26	4:37	—	—
3:40	3:57	4:03	4:13	4:27	4:41	4:52	—	—
3:55	4:12	4:18	4:28	4:42	4:56	5:07	—	—
4:10	4:27	4:33	4:43	4:57	5:11	5:22	—	—
4:25	4:42	4:48	4:58	5:12	5:26	5:37	—	—
4:40	4:57	5:03	5:13	5:27	5:41	5:52	—	—
4:55	5:12	5:18	5:28	5:42	5:56	6:04	—	—
5:10	5:27	5:33	5:43	5:57	6:11	6:19	—	—
5:25	5:42	5:48	5:58	6:12	6:26	6:36	—	—
5:40	5:57	6:03	6:13	6:26	6:40	6:48	—	—
5:56	6:12	6:18	6:28	6:41	6:55	7:03	—	—
6:11	6:27	6:33	6:43	6:56	7:10	7:18	—	—
6:41	6:57	7:03	7:13	7:26	7:40	7:47	8:03P	8:11P
7:12	7:27	7:33	7:43	7:56	8:08	8:15	—	—
7:42	7:57	8:03	8:13	8:26	8:38	8:48	—	—
8:11	8:26	8:32	8:42	8:55	9:07	9:15	—	—
8:42	8:57	9:03	9:13	9:24	9:36	9:43	9:54	10:02
9:14	9:28	9:34	9:44	9:55	10:06	10:13	10:24	10:32
9:43	9:57	10:03	10:11	10:22	10:33	10:40	10:51	10:59
10:15	10:26	10:32	10:40	10:50	11:01	11:08	11:18	11:26
10:47	10:58	11:03	11:11	11:20	11:31	11:38	11:47	11:55
11:16	11:26	11:31	11:38	11:47	11:58	12:05A	12:14A	12:22A
11:48	11:58	12:03A	12:10A	12:18A	12:29A	12:36	12:45	12:53
12:18A	12:28A	12:33	12:40	12:48	12:59	1:05	1:14	1:22
12:48	12:58	1:03	1:10	1:18	1:28	1:34	1:43	1:50
1:18	1:28	1:33	1:40	1:48	1:58	2:04	2:13	2:20
1:48	1:58	2:03	2:10	2:17	2:26	2:32	2:41	2:48
2:18	2:28	2:33	2:40	2:47	2:56	3:02	3:11	3:18
2:48	2:58	3:03	3:10	3:17	3:26	3:32	3:41	3:48
3:18	3:28	3:33	3:39	3:46	3:55	4:01	4:10	4:17
3:49	3:59	4:04	4:10	4:17	4:26	4:32	4:41	4:48

Effective Jul 27 2020

20

Metro Local

Eastbound to Downtown Los Angeles
Westbound to Santa Monica
via Wilshire Bl

metro.net
323.GO.METRO

Travel Info
511

Wheelchair Hotline
800.621.7828

California Relay Service
711

N

Metro

Subject to change without notice
Sujeto a cambios sin previo aviso

Sunday and Holiday Schedules

Sunday & Holiday schedule in effect on New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

Horarios de domingo y días feriados

Horarios de domingo y días feriados en vigor para New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day y Christmas Day.

Nextrip

Text "metro" and your intersection or stop number to 41411 (example: metro vignes&cesarechavez or metro 1563). You can also visit metro.net or call 511 and say "Nextrip"

Nextrip

Envíe un mensaje de texto con "Metro" y la intersección de la calle o el número de su parada al 41411. Nextrip le enviará un mensaje de texto con la próxima llegada de cada autobús en esa parada. También puede visitar metro.net o llamar al 511 y decir "Nextrip"

Special Notes

B Trip starts at Wilshire & Highland 4 minutes before time shown at Wilshire & Crenshaw. Operates school days only, except early dismissal school days.
Phone Metro Information for exact days of operation.

C Operation on early dismissal school days. Trip starts at Wilshire & Highland 4 minutes before time shown at Wilshire & Crenshaw.
Phone Metro Information for exact days of operation.

D Line 20 boards and alights passengers at Wilshire and Glendon Ave or Wilshire and Veteran Ave between the hours of 9 pm and 6 am every night and some weekends all day when construction is present. (see timetable map)

E Westbound Line 20 boards and alights passengers at Wilshire and Crescent Heights.

Avisos especiales

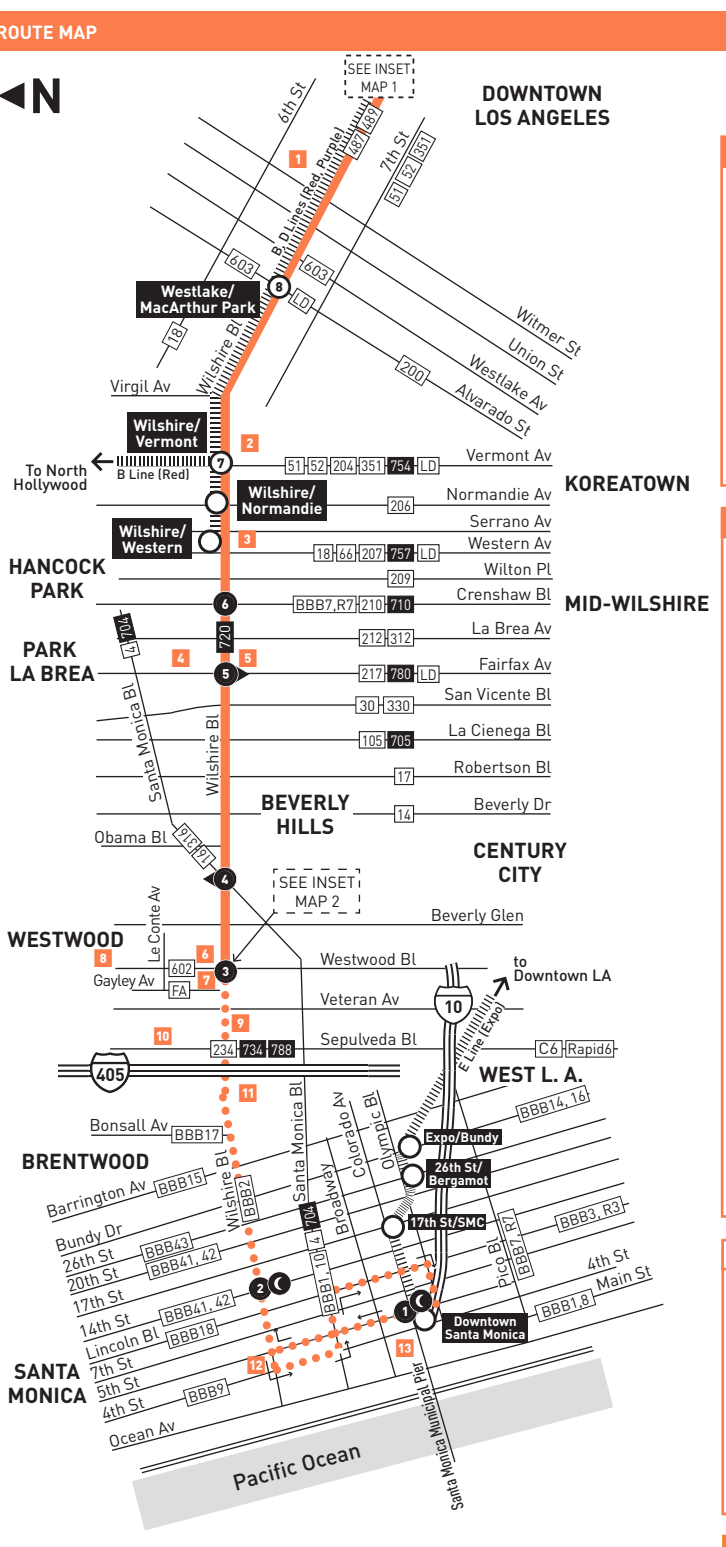
B *Viaje comienza en Wilshire y Highland 4 minutos antes de la hora mostrada en Wilshire y Crenshaw. Opera dias de escuela solamente, menos los dias de despido temprano de escuela. Favor de llamar para mas informacion los dias exactos de operacion.*

C *Opera dias de escuela solamente menos los dias de despido temprano de escuela. Viaje comienza en Wilshire y Highland 4 minutos antes de la hora mostrada en Wilshire y Crenshaw. Favor de llamar para mas informacion los dias exactos de operacion.*

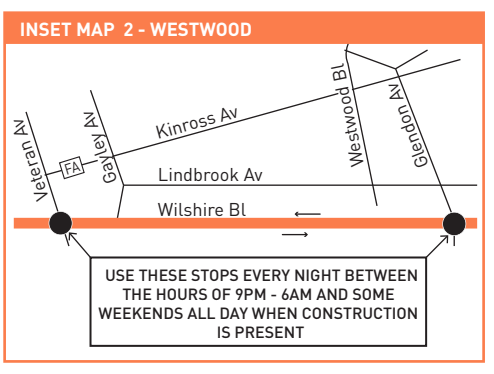
D *Línea 20 tablas y pasajeros de luces en Wilshire y Glendon Ave o Wilshire y Veteran Ave entre las horas de 9 pm y 6 am todas las noches y algunos fines de semana todo el día cuando la construcción está presente. (ver mapa de horarios)*

E *Se puede subir o desembarcar en la línea 20 hacia el oeste en Wilshire y Crescent Heights.*

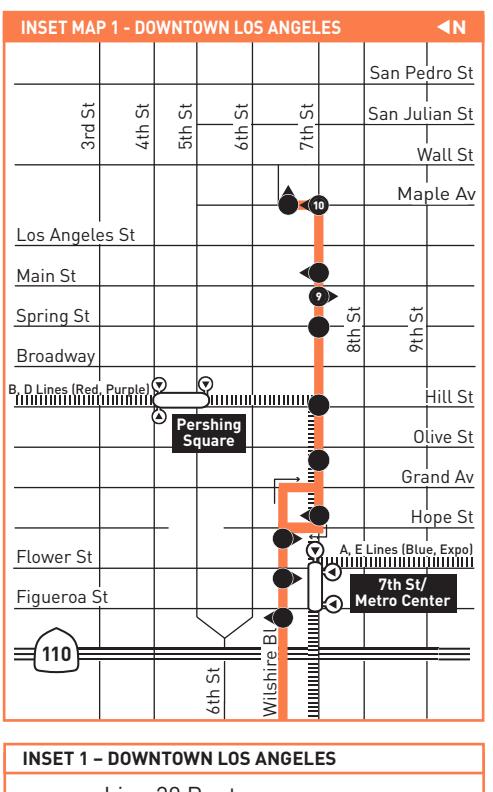
ROUTE MAP



INSET MAP 2 - WESTWOOD



INSET MAP 1 - DOWNTOWN LOS ANGELES N



INSET 1 – DOWNTOWN LOS ANGELES

- Line 20 Route
- Local Stop
- Local Stop - Single Direction Only
- Metro Rail Station
- Metro Rail Station Entrance
- Metro Rail

LEGEND

- Line 20 Route
- Line 20 AM, Eve/Owl Trips
- Early AM, Eve/Owl Timepoint
- Local Stop
- Local Stop - Single Direction Only
- Local Stop Timepoint
- Local Stop Timepoint - Single Direction Only
- Metro Rail Station & Timepoint
- Metro Rail Station
- Metro Rail
- FA LAX FlyAway
- AV Antelope Valley Transit Authority
- BBB Santa Monica's Big Blue Bus
- C Culver CityBus
- CE LADOT Commuter Express
- LD LADOT DASH
- SC Santa Clarita Transit

MAP NOTES

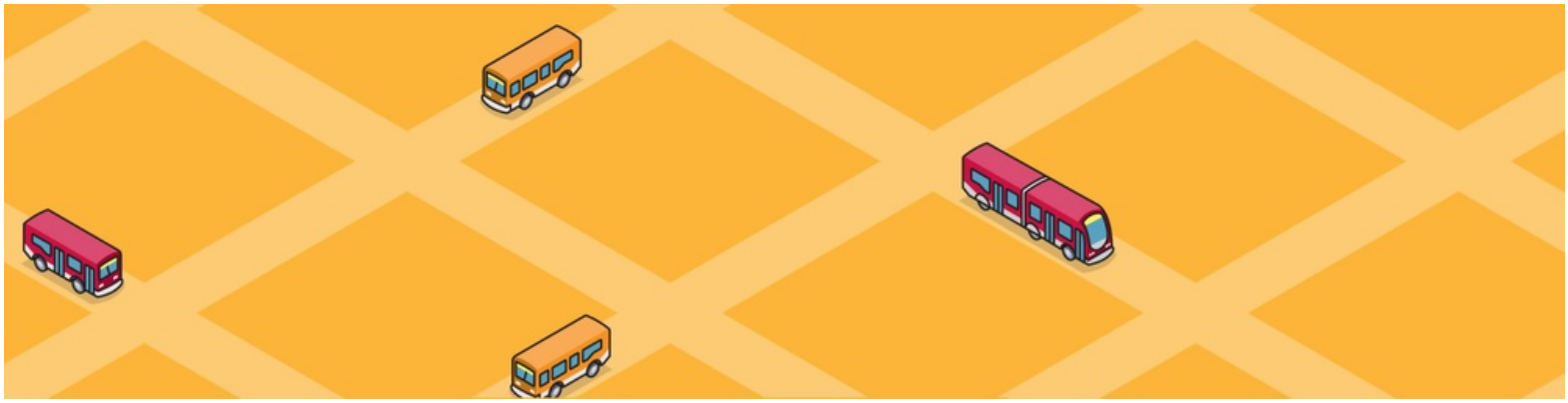
1. **Good Samaritan Hospital**
2. **Wilshire/Vermont Customer Center**
3. **Wiltern Theatre**
4. **LA County Museum of Art**
5. **Petersen Automotive Museum**
6. **Armand Hammer Museum**
7. **Westwood Bl Village**
   Metro 2, 20, 234 (Late nights, early mornings & weekends), 302, 602, 720, 734, 788, AV 786; BBB 1, 2, 8; Rapid 12, 17, 18; C6; Rapid 6; CE 431, 534, 573; SC 792, 797
8. **UCLA**
9. **Federal Building**
10. **LA National Cemetery**
11. **Veteran's Hospital**
12. **4th St & Wilshire Bl**
    BBB 2, 3, 9; Rapid 3
13. **Third Street Promonade**
    Metro 4 Owl, 20 Owl, 534, 704, 720, BBB1, 2, 3, 5, 7, 8, 9, 18; Rapid 3, 7, 10

EXHIBIT D

M

(/)

COVID-19: **Metro has adjusted service in response to COVID-19 and face coverings are now required on all buses and trains. >>** (https://wp.me/p26tDN-wu7)



Service Changes

Schedule changes effective June 21, 2020

Effective Sunday, June 21, some Metro buses will begin running increased service to add capacity for essential travel. All other lines not mentioned below, will continue on a modified Sunday schedule every day of the week. Train service will remain the same. By increasing service in our busiest bus lines, we will help alleviate crowding and encourage riders to social distance while riding Metro. We ask that riders to wear a face covering at all times unless you have a health condition or disability that prevents you from wearing one.

Please keep in mind that we will continue to adjust our service accordingly as it aligns with the four stages of the California reopening plan.

It is important to stress that we continue to provide bus and rail service to every community that is currently served by Metro.

- Metro Bus and Rail Schedules (/riding/schedules/)

Service Change Notices

Line	Message

18 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/18-scn.pdf)	Additional Weekday trips
20 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/20-scn.pdf)	Additional weekday trip
28 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/28-scn.pdf)	Additional Weekday trips
33 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/33-scn.pdf)	Additional weekday trip
45 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/45-scn.pdf)	Additional Weekday trips
51 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/51-scn.pdf)	Additional Weekday trips
53 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/53-scn.pdf)	Additional Weekday trips
55 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/55-scn.pdf)	Additional Weekday trips
66 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/66-scn.pdf)	Additional Weekday trips
81 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/81-scn.pdf)	Additional Weekday trips
108 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/108-scn.pdf)	Additional Weekday trips
111 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/111-scn.pdf)	Additional Weekday trips



152 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/152-scn.pdf)	Additional Weekday early morning trip
180/181 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/180-181-scn.pdf)	Additional Weekday trips
204 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/204-scn.pdf)	Additional Weekday trips
224 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/224-scn.pdf)	Additional Weekday morning trip
232 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/232-scn.pdf)	Additional Weekday Trips
260 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/260-scn.pdf)	Additional Weekday Trips
720 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/720-scn.pdf)	Additional Weekday trips
754 (http://media.metro.net/riding_metro/bus_overview/images/service-changes/754-scn.pdf)	Additional Weekday trips

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Every six months, typically in June and December, Metro Operations undergoes a service change program or "shakeup." Bus schedules are adjusted to accommodate ridership demands and improve connections between Metro Bus, Metro Rail and other transit services throughout the region. Metro's online trip planning info in the Metro Trip Planner, Google Transit and Bing Maps is updated as part of the cycle.

Metro Service Planning, Scheduling & Development staff develops and evaluates each service change program based on input from patrons, employees, studies, local operator requests, and performance monitoring results in accordance with Transit Service Policy (/media/images/service_changes_transit_service_policy.pdf) guidelines

The evaluation process includes a formal public review of the proposals, a technical evaluation of ridership and resource impacts based on established service guidelines and standards, environmental considerations, and coordination with key stakeholders in the regional bus system.

Federal guidelines (https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/title-vi-requirements-and-guidelines-federal-transit) and Metro policy require that a public hearing be held when major service changes to the bus and rail system are considered. Metro conducts outreach to notify the public of the upcoming changes, conducts ride-a-longs on impacted lines, convenes public hearings, and surveys riders for public comment. Proposed service change information is also made available onboard Metro buses and trains, and on a dedicated web page (/about/metro-service-changes/metro-making-service-changes/) .

Once a program is reviewed and approved by the Service Councils (/about/service-councils/) and then the Board of Directors (/about/board/executives/) , the proposed service changes go into effect, and new public timetables and bus operator work assignments are developed.

Annual Activity Timeline		Public Process	Service Planning Activities
May	November/December	Preview of proposed service changes, public hearing date determined	Finalize service change proposals for public hearings
June	January	Public hearings advertised	Conduct Title VI Review
July	February	Service Councils convene public hearings	Receive public comments
August	March	Service Councils vote on proposals	Finalize program
September	April	Report with Council recommendations submitted to Metro Board	Prepare Board presentation of recommended changes

October/November	May	Present Board-approved changes to Service Councils	Program Approval Develop New Service Schedules
December	June	Shakeup – New schedules implemented	Print Public Time Tables and Operator Assignments Begin planning process for next schedule cycle

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Federal guidelines and MTA policy require that a public hearing be held when major service changes to the bus system are considered.

Major service changes are defined as:

- A change of 25% or more in the transit route miles.
- A change of 25% or more in the revenue vehicle miles.
- A new transit route is proposed.
- Standard seasonal variations in transit service are exempt from public hearing requirements unless the number, timing and type of service changes meet specific criteria.
- Emergency service changes may be instituted for 180 days or less without prior notification. A public hearing must be held during that time if the emergency service is to remain in effect for more than 180 days.
- A change is not considered to be major if the service is replaced without interruption at a level that would not otherwise constitute a major change.

Public hearing Process

Metro's Service Councils by-laws require that they convene public hearings to gather public comment on major service changesand that they make recommendations to approve, modify, or deny the proposed changes. Their recommendations are then forwarded to the Metro Board of Directors for approval.

The process begins when Metro Service Planning staff present the proposed service change program to the Service Councils. The Service Councils then set dates, times and locations for public hearings to be held in each region where changes are proposed. If the proposed

changes affect more three or more regions, an additional hearing is held at a central location on a Saturday (usually at Metro's downtown headquarters).

After the hearing details are established, a Notice of Public Hearing is published in regional newspapers a minimum of 30 days in advance of the hearings. Brochures are also developed that include the times, dates, and locations of the hearings, the line numbers, names and route changes proposed, and information on how the public can submit their comments s via email, mail, or fax. The brochures are then distributed at key transportation centers, bus and rail stations, and on Metro buses and trains up to one month before the public hearing is held.

At each public hearing, a detailed presentation of the proposed changes is provided, then public comments are accepted on the proposals. The public hearing is adjourned when all comments have been received.

Subsequent to each hearing, Service Planning staff reviews all comments, and summarizes them in a report with their final service change recommendations. The report is then presented to each Service Council for consideration. The Service Councils then vote to approve, modify, or deny the proposed service changes; their actions are then be summarized and presented to the Metro Board of Directors who then approves the Service Council recommendations or an alternate service change plan.

Metro Transit Info

323.GO.METRO

Mon-Fri 6:30am to 7pm
Sat/Sun 8am to 4:30pm

Tap Customer Service

866.TAPTOGO

Mon-Fri 8am to 4:30pm | Taptogo Website (https://www.taptogo.net)

Transit Watch Metro Security

888.950.7233

24 hours | Report an Issue

Agency Links...

Help & Contacts (/about/contact/)

Customer Centers (/about/contact/#customer-centers)

Metro Careers (/about/careers/)

Board Meetings (https://boardagendas.metro.net/)

Board Recap of Actions (/about/board/recap-actions/)

Media (/news/media-relations-contact-information/)

Investor Relations (https://www.metrobonds.net)

Suppliers + Contractors (http://business.metro.net)

Open Data + Developers (http://developer.metro.net)

Information For...

Fares (/riding/fares/)

Trip Planner (/riding/trip-planner/)

Nextrip Arrivals (/riding/nextrip/)

Alerts + Advisories (/service/advisories/)

Schedules & Maps (/riding/schedules/)

Comment Policy (http://thesource.metro.net/2010/09/08/the-sources-comment-policy)

Employee Intranet (/mymetro)

Employee Self Service (http://fisesss.mta.net/OA_HTML/AppsLocalLogin.jsp)

(http://twitter.com/#!/metrolosangeles) (http://www.facebook.com/losangelesmetro)

(https://www.instagram.com/metrolosangeles/) (https://www.youtube.com/user/losangelesmetro)

(http://www.linkedin.com/company/los-angeles-county-metropolitan-transportation-authority) (/news/metro-rss/)

translate | accessibility (/riding/riders-disabilities/)

site feedback (/customercomments) | site map (/about/site-information/site-map/)

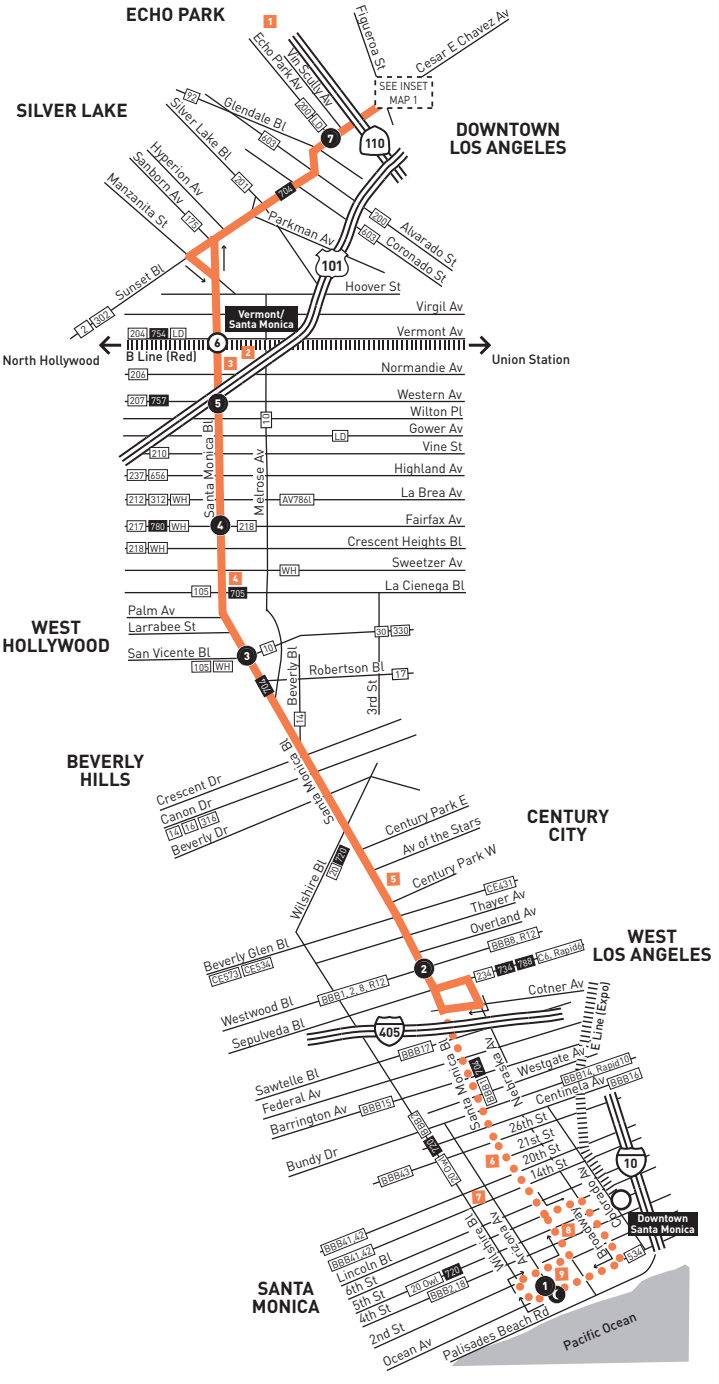
| terms of use (/about/site-information/copyright/)

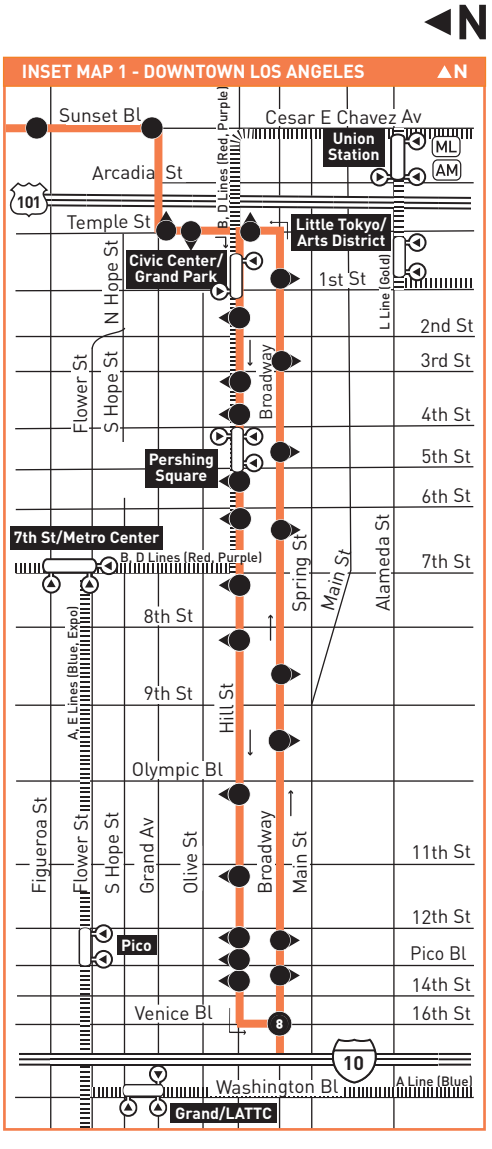
| privacy policy (/about/site-information/privacy-policy/)

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EXHIBIT E

ROUTE MAP





INSET 1 – DOWNTOWN LOS ANGELES

- Line 4 Route
- # Local Stop Timepoint
- # Local Stop Timepoint - Single Direction Only
- Metro Rail Station
- Metro Rail Station Entrance
- ML Metrolink
- AM Amtrak

MAP NOTES

1. **Dodger Stadium**
2. **Braille Institute**
3. **LA City College**
4. **West Hollywood City Hall**
5. **Westfield Century City**
   Metro 4, 16, 28, 316, 704, 728; AV786; BBB5; C3, CE534, 573; SC792, 797
6. **St. John's Hospital**
7. **Santa Monica-UCLA Medical Center**
8. **Santa Monica Bl & 4th St/ Broadway & 4th St**
   Metro 4 Owl, 20 Owl, 534, 704, 720; BBB1, 2, 3, 5, 7, 8, 9, 18; Rapid3, 7, 10
9. **Ocean Av & Santa Monica Bl**
   Metro 4 Owl, 33 Owl, 534, 704, 733; BBB8

LEGEND

- Line 4 Route
- Line 4 Early Am, Eve/Owl Trips Only
- Early Am, Eve/Owl Timepoint
- Local Stop
- Local Stop - Single Direction Only
- # Metro Rail Station & Timepoint
- Metro Rail
- Metro Rail Station
- AV Antelope Valley Transit Authority
- BBB Santa Monica's Big Blue Bus
- C Culver CityBus
- CE LADOT Commuter Express
- LD LADOT DASH
- SC Santa Clarita Transit
- WH West Hollywood Cityline

Monday through Friday

Effective Jun 21 2020

Eastbound *Al Este* (Approximate Times / *Tiempos Aproximados*)

SANTA MONICA	WEST LOS ANGELES	WEST HOLLYWOOD		LOS ANGELES		ECHO PARK	LOS ANGELES
1	2	3	4	5	6	7	8
Ocean & Arizona	Santa Monica & Westwood B	Santa Monica & San Vicente	Santa Monica & Fairfax	Santa Monica & Western	Santa Monica / Vermont Station	Sunset & Echo Park	Venice & Broadway
4:42A	5:00A	5:13A	5:18A	5:31A	5:36A	5:46A	6:03A
5:10	5:28	5:41	5:47	6:00	6:05	6:16	6:33
5:33	5:52	6:05	6:11	6:25	6:30	6:41	6:59
5:53	6:14	6:27	6:33	6:47	6:52	7:03	7:21
6:11	6:32	6:45	6:51	7:05	7:10	7:21	7:40
6:25	6:47	7:00	7:06	7:20	7:25	7:36	7:55
6:38	7:00	7:14	7:20	7:34	7:40	7:51	8:10
6:50	7:13	7:27	7:33	7:49	7:55	8:07	8:26
7:03	7:27	7:42	7:48	8:04	8:10	8:22	8:41
7:17	7:42	7:57	8:03	8:19	8:25	8:38	8:57
—	7:56	8:11	8:18	8:34	8:40	8:53	9:13
—	8:10	8:25	8:32	8:49	8:55	9:09	9:29
—	8:25	8:40	8:47	9:04	9:10	9:24	9:44
—	8:40	8:55	9:02	9:19	9:25	9:39	9:59
—	8:54	9:10	9:17	9:34	9:40	9:54	10:15
—	9:08	9:24	9:31	9:49	9:55	10:10	10:32
—	9:22	9:38	9:46	10:04	10:10	10:25	10:47
—	9:36	9:52	10:00	10:19	10:25	10:41	11:03
—	9:49	10:05	10:15	10:34	10:41	10:57	11:20
—	10:03	10:19	10:29	10:49	10:56	11:12	11:35
—	10:18	10:34	10:44	11:04	11:11	11:27	11:50
—	10:31	10:48	10:58	11:19	11:26	11:43	12:06P
—	10:46	11:03	11:13	11:34	11:41	11:58	12:20
—	11:01	11:18	11:28	11:49	11:56	12:13P	12:35
—	11:16	11:33	11:43	12:04P	12:11P	12:28	12:50
—	11:29	11:47	11:57	12:19	12:26	12:43	1:05
—	11:42	11:59	12:12P	12:34	12:41	12:58	1:20
—	11:56	12:15P	12:27	12:49	12:56	1:13	1:35
—	12:10P	12:30	12:42	1:04	1:11	1:28	1:50
—	12:25	12:45	12:57	1:19	1:26	1:43	2:05
—	12:40	1:00	1:12	1:34	1:41	1:58	2:20
—	12:55	1:15	1:27	1:49	1:56	2:13	2:35
—	1:10	1:30	1:42	2:04	2:11	2:28	2:51
—	1:24	1:45	1:57	2:19	2:26	2:43	3:06
—	1:40	2:01	2:13	2:35	2:41	2:58	3:21
—	1:54	2:15	2:27	2:50	2:56	3:13	3:36
—	2:09	2:30	2:42	3:05	3:11	3:28	3:50
—	2:24	2:45	2:57	3:20	3:26	3:43	4:05
—	2:39	3:00	3:12	3:35	3:41	3:58	4:20
—	2:54	3:15	3:27	3:50	3:56	4:12	4:34
—	3:09	3:30	3:42	4:05	4:11	4:27	4:48
—	3:23	3:45	3:57	4:20	4:26	4:41	5:02
—	3:39	4:01	4:12	4:35	4:41	4:56	5:17
—	3:54	4:16	4:27	4:50	4:56	5:11	5:32
—	4:09	4:31	4:42	5:05	5:11	5:26	5:47
—	4:24	4:47	4:58	5:20	5:26	5:41	6:02
—	4:39	5:02	5:13	5:35	5:41	5:56	6:16
—	4:53	5:17	5:28	5:50	5:56	6:11	6:31
—	5:07	5:32	5:43	6:05	6:11	6:26	6:45
—	5:23	5:47	5:58	6:20	6:26	6:41	7:00
—	5:38	6:01	6:12	6:35	6:41	6:56	7:15
—	5:52	6:15	6:26	6:50	6:56	7:11	7:30
—	6:07	6:30	6:41	7:06	7:11	7:26	7:45
—	6:23	6:45	6:56	7:21	7:26	7:40	7:59
—	6:41	7:03	7:13	7:36	7:41	7:55	8:14
—	7:00	7:21	7:31	7:51	7:56	8:10	8:29
—	7:15	7:36	7:46	8:06	8:11	8:25	8:44
—	7:32	7:52	8:02	8:21	8:26	8:40	8:58
—	7:49	8:08	8:18	8:36	8:41	8:55	9:13
—	8:12	8:30	8:39	8:56	9:01	9:14	9:33
—	8:36	8:54	9:03	9:20	9:25	9:38	9:57
—	9:00	9:18	9:27	9:44	9:49	10:02	10:21
—	9:24	9:42	9:51	10:08	10:13	10:26	10:45
—	9:48	10:06	10:15	10:32	10:36	10:48	11:06
—	10:12	10:30	10:39	10:56	11:00	11:11	11:28
—	10:37	10:56	11:04	11:20	11:24	11:35	11:51
—	11:00	11:20	11:28	11:44	11:48	11:59	12:15A
—	11:25	11:44	11:52	12:08A	12:12A	12:22A	12:38
11:28P	11:50	12:08A	12:16A	12:32	12:36	12:46	1:02
11:48	12:09A	12:26	12:33	12:47	12:51	1:01	1:17
12:06A	12:25	12:41	12:48	1:02	1:06	1:16	1:32
12:18	12:37	12:52	12:59	1:13	1:17	1:27	1:43
12:31	12:50	1:05	1:12	1:26	1:30	1:40	1:56
12:45	1:04	1:19	1:26	1:40	1:44	1:54	2:10
12:59	1:18	1:33	1:40	1:54	1:58	2:07	2:23
1:18	1:37	1:52	1:59	2:12	2:16	2:25	2:41
1:38	1:57	2:12	2:19	2:32	2:36	2:45	3:01
1:59	2:17	2:32	2:39	2:52	2:56	3:05	3:21
2:24	2:42	2:57	3:04	3:17	3:21	3:30	3:46
2:49	3:07	3:22	3:29	3:42	3:46	3:55	4:11
3:16	3:34	3:48	3:54	4:07	4:11	4:20	4:36
3:48	4:06	4:19	4:25	4:37	4:41	4:50	5:06
4:18	4:36	4:49	4:55	5:07	5:11	5:20	5:36

Westbound *Al Oeste* (Approximate Times / *Tiempos Aproximados*)

LOS ANGELES	ECHO PARK	LOS ANGELES		WEST HOLLYWOOD		WEST LOS ANGELES	SANTA MONICA
8	7	6	5	4	3	2	1
Venice & Broadway	Sunset & Echo Park	Santa Monica / Vermont Station	Santa Monica & Western	Santa Monica & Fairfax	Santa Monica & San Vicente	Santa Monica & Westwood C	Ocean & Arizona
D4:07A	4:24A	4:33A	4:37A	4:48A	4:53A	5:05A	5:23A
4:33	4:49	4:58	5:02	5:13	5:18	5:30	5:54
4:54	5:11	5:21	5:25	5:37	5:43	5:56	6:20
5:13	5:30	5:40	5:45	5:57	6:03	6:16	6:40
5:32	5:50	6:00	6:05	6:17	6:23	6:37	7:01
5:51	6:09	6:20	6:25	6:38	6:44	7:02	—
6:10	6:28	6:40	6:45	6:58	7:04	7:22	—
6:26	6:45	6:57	7:02	7:16	7:22	7:40	—
6:40	6:59	7:11	7:17	7:31	7:37	7:55	—
6:54	7:14	7:26	7:32	7:46	7:52	8:10	—
7:08	7:28	7:41	7:47	8:01	8:08	8:26	—
7:23	7:43	7:56	8:02	8:17	8:24	8:42	—
7:37	7:57	8:11	8:17	8:32	8:41	8:59	—
7:51	8:12	8:26	8:32	8:48	8:57	9:17	—
8:06	8:27	8:41	8:47	9:03	9:12	9:32	—
8:21	8:42	8:56	9:02	9:19	9:28	9:48	—
8:34	8:55	9:10	9:17	9:34	9:45	10:05	—
8:49	9:10	9:25	9:32	9:49	10:00	10:20	—
9:03	9:25	9:40	9:47	10:04	10:15	10:35	—
9:18	9:40	9:55	10:02	10:20	10:31	10:51	—
9:34	9:55	10:10	10:17	10:35	10:46	11:06	—
9:49	10:10	10:25	10:32	10:51	11:02	11:22	—
10:02	10:24	10:40	10:47	11:06	11:17	11:37	—
10:17	10:39	10:55	11:02	11:21	11:32	11:52	—
10:31	10:53	11:10	11:17	11:36	11:47	12:09P	—
10:45	11:08	11:25	11:32	11:52	12:03P	12:27	—
10:57	11:22	11:39	11:47	12:07P	12:18	12:42	—
11:11	11:36	11:54	12:02P	12:23	12:34	12:58	—
11:24	11:51	12:09P	12:17	12:38	12:50	1:14	—
11:39	12:06P	12:24	12:32	12:53	1:05	1:29	—
11:54	12:21	12:39	12:47	1:08	1:20	1:44	—
12:09P	12:36	12:54	1:02	1:23	1:35	1:59	—
12:24	12:51	1:09	1:17	1:38	1:50	2:14	—
12:39	1:06	1:24	1:32	1:53	2:05	2:29	—
12:54	1:21	1:39	1:47	2:08	2:20	2:44	—
1:09	1:36	1:54	2:02	2:23	2:35	2:58	—
1:24	1:51	2:09	2:17	2:38	2:50	3:13	—
1:39	2:06	2:24	2:32	2:52	3:04	3:27	—
1:53	2:21	2:39	2:47	3:07	3:19	3:42	—
2:08	2:36	2:54	3:02	3:22	3:34	3:57	—
2:23	2:51	3:09	3:17	3:37	3:49	4:12	—
2:38	3:06	3:24	3:32	3:52	4:04	4:27	—
2:54	3:21	3:39	3:47	4:07	4:19	4:42	—
3:10	3:36	3:54	4:02	4:22	4:34	4:57	—
3:25	3:51	4:09	4:17	4:37	4:49	5:11	—
3:40	4:06	4:24	4:32	4:52	5:04	5:25	—
3:55	4:21	4:39	4:47	5:07	5:18	5:39	—
4:10	4:36	4:54	5:02	5:22	5:33	5:54	—
4:26	4:52	5:09	5:17	5:37	5:47	6:08	—
4:41	5:07	5:24	5:32	5:51	6:01	6:22	—
4:58	5:23	5:40	5:47	6:06	6:16	6:37	—
5:14	5:38	5:55	6:02	6:21	6:31	6:51	—
5:30	5:54	6:10	6:17	6:36	6:46	7:06	—
5:45	6:09	6:25	6:32	6:50	7:00	7:19	—
6:00	6:24	6:40	6:47	7:05	7:14	7:33	—
6:15	6:39	6:55	7:02	7:20	7:29	7:48	—
6:31	6:54	7:10	7:17	7:35	7:44	8:02	—
6:46	7:09	7:25	7:32	7:50	7:59	8:16	—
7:03	7:26	7:41	7:47	8:04	8:13	8:30	—
7:18	7:41	7:56	8:02	8:18	8:27	8:44	—
7:39	8:01	8:16	8:22	8:38	8:47	9:04	—
8:03	8:25	8:40	8:46	9:02	9:11	9:28	—
8:27	8:49	9:04	9:10	9:26	9:36	9:53	—
8:55	9:16	9:31	9:36	9:52	10:02	10:19	—
9:18	9:38	9:53	9:58	10:13	10:24	10:40	11:04P
9:43	10:03	10:17	10:22	10:37	10:48	11:04	11:26
9:58	10:18	10:32	10:37	10:52	11:03	11:19	11:41
10:10	10:30	10:44	10:49	11:04	11:16	11:32	11:54
10:31	10:51	11:04	11:08	11:23	11:35	11:50	12:11A
10:50	11:10	11:22	11:26	11:40	11:52	12:07A	12:27
D11:07	11:25	11:37	11:41	11:55	12:05A	12:19	12:39
11:25	11:44	11:56	11:59	12:13A	12:22	12:35	12:55
11:45	12:04A	12:15A	12:19A	12:32	12:41	12:53	1:13
D12:06A	12:24	12:35	12:39	12:51	1:00	1:12	1:32
12:26	12:44	12:55	12:59	1:11	1:20	1:32	1:52
12:46	1:04	1:15	1:19	1:31	1:38	1:50	2:10
D1:07	1:25	1:35	1:39	1:51	1:58	2:10	2:30
1:36	1:54	2:04	2:08	2:20	2:27	2:39	2:59
D2:06	2:24	2:34	2:38	2:49	2:56	3:07	3:27
2:36	2:54	3:04	3:08	3:19	3:25	3:36	3:56
D3:06	3:24	3:34	3:38	3:49	3:55	4:06	4:26
3:39	3:55	4:04	4:08	4:19	4:25	4:35	4:55

Saturday, Sunday and Holiday Schedule

Effective Jun 21 2020

Eastbound *Al Este* (Approximate Times / *Tiempos Aproximados*)

SANTA MONICA	WEST LOS ANGELES	WEST HOLLYWOOD		LOS ANGELES		ECHO PARK	LOS ANGELES
1	2	3	4	5	6	7	8
Ocean & Arizona	Santa Monica & Westwood E	Santa Monica & San Vicente	Santa Monica & Fairfax	Santa Monica & Western	Santa Monica / Vermont Station	Sunset & Echo Park	Venice & Broadway
4:43A	5:01A	5:14A	5:20A	5:32A	5:36A	5:46A	6:03A
5:08	5:26	5:39	5:45	5:57	6:01	6:11	6:28
5:31	5:49	6:02	6:08	6:22	6:27	6:37	6:54
5:52	6:12	6:25	6:31	6:45	6:50	7:00	7:17
—	6:32	6:45	6:51	7:05	7:10	7:22	7:39
6:24	6:47	7:00	7:07	7:22	7:27	7:39	7:56
6:39	7:02	7:17	7:24	7:39	7:44	7:56	8:14
6:55	7:19	7:34	7:41	7:56	8:01	8:13	8:31
—	7:36	7:51	7:58	8:13	8:18	8:30	8:48
7:25	7:53	8:08	8:15	8:30	8:35	8:47	9:05
—	8:09	8:24	8:31	8:46	8:51	9:04	9:23
—	8:25	8:40	8:47	9:02	9:08	9:22	9:41
—	8:40	8:55	9:02	9:18	9:24	9:38	9:57
—	8:54	9:10	9:18	9:34	9:40	9:54	10:14
—	9:10	9:26	9:34	9:50	9:56	10:10	10:30
—	9:25	9:41	9:49	10:05	10:11	10:25	10:45
—	9:39	9:55	10:03	10:20	10:26	10:40	11:00
—	9:53	10:09	10:18	10:35	10:41	10:55	11:15
—	10:08	10:24	10:33	10:50	10:56	11:11	11:32
—	10:23	10:39	10:48	11:05	11:11	11:26	11:47
—	10:37	10:53	11:02	11:20	11:26	11:41	12:02P
—	10:51	11:08	11:17	11:35	11:41	11:56	12:17
—	11:05	11:23	11:32	11:50	11:56	12:11P	12:32
—	11:20	11:38	11:47	12:05P	12:11P	12:26	12:47
—	11:34	11:52	12:01P	12:20	12:26	12:41	1:02
—	11:48	12:06P	12:16	12:35	12:41	12:56	1:17
—	12:03P	12:21	12:31	12:50	12:56	1:11	1:32
—	12:18	12:36	12:46	1:05	1:11	1:26	1:47
—	12:33	12:51	1:01	1:20	1:26	1:41	2:02
—	12:47	1:06	1:16	1:35	1:41	1:56	2:17
—	1:01	1:21	1:31	1:50	1:56	2:11	2:32
—	1:16	1:36	1:46	2:05	2:11	2:26	2:47
—	1:31	1:51	2:01	2:20	2:26	2:41	3:02
—	1:46	2:06	2:16	2:35	2:41	2:56	3:17
—	2:01	2:21	2:31	2:50	2:56	3:11	3:32
—	2:16	2:36	2:46	3:05	3:11	3:26	3:47
—	2:29	2:49	2:59	3:20	3:26	3:41	4:02
—	2:44	3:04	3:14	3:35	3:41	3:56	4:17
—	2:59	3:19	3:29	3:50	3:56	4:11	4:32
—	3:14	3:34	3:44	4:05	4:11	4:26	4:46
—	3:29	3:49	3:59	4:20	4:26	4:40	5:00
—	3:44	4:04	4:14	4:35	4:42	4:56	5:16
—	4:00	4:20	4:30	4:50	4:57	5:11	5:30
—	4:15	4:35	4:45	5:05	5:12	5:26	5:45
—	4:30	4:50	5:00	5:20	5:27	5:41	6:00
—	4:45	5:05	5:15	5:35	5:42	5:56	6:15
—	5:01	5:21	5:31	5:51	5:58	6:12	6:31
—	5:17	5:37	5:47	6:07	6:14	6:28	6:46
—	5:33	5:53	6:03	6:23	6:30	6:44	7:02
—	5:51	6:11	6:21	6:40	6:46	7:00	7:18
—	6:09	6:29	6:38	6:57	7:03	7:17	7:34
—	6:26	6:46	6:55	7:14	7:20	7:34	7:51
—	6:43	7:03	7:12	7:31	7:37	7:50	8:07
—	7:03	7:23	7:32	7:48	7:54	8:07	8:24
—	7:22	7:40	7:49	8:05	8:11	8:24	8:41
—	7:40	7:57	8:06	8:22	8:28	8:40	8:57
—	7:57	8:14	8:23	8:39	8:45	8:57	9:14
—	8:15	8:32	8:40	8:56	9:01	9:13	9:30
—	8:33	8:49	8:57	9:13	9:18	9:30	9:47
—	8:50	9:06	9:14	9:30	9:35	9:47	10:04
—	9:07	9:23	9:31	9:47	9:52	10:04	10:21
—	9:25	9:41	9:49	10:04	10:09	10:20	10:37
—	9:43	9:59	10:06	10:21	10:26	10:37	10:54
—	10:01	10:16	10:23	10:38	10:43	10:54	11:11
—	10:18	10:33	10:40	10:55	11:00	11:11	11:28
—	10:36	10:51	10:58	11:12	11:16	11:27	11:44
—	10:53	11:08	11:15	11:29	11:33	11:43	11:59
—	11:10	11:25	11:32	11:46	11:50	11:59	12:14A
11:07P	11:28	11:43	11:50	12:04A	12:08A	12:18A	12:32
11:29	11:48	12:03A	12:09A	12:22	12:26	12:36	12:50
11:49	12:08A	12:21	12:27	12:40	12:44	12:54	1:08
12:07A	12:26	12:39	12:45	12:58	1:02	1:11	1:25
12:25	12:44	12:57	1:03	1:16	1:20	1:29	1:43
12:44	1:02	1:15	1:21	1:34	1:38	1:47	2:01
1:02	1:20	1:33	1:39	1:52	1:56	2:05	2:19
1:22	1:40	1:53	1:59	2:12	2:16	2:25	2:39
1:42	2:00	2:13	2:19	2:32	2:36	2:45	2:59
2:02	2:20	2:33	2:39	2:52	2:56	3:05	3:19
2:27	2:45	2:58	3:04	3:17	3:21	3:30	3:44
2:52	3:10	3:23	3:29	3:42	3:46	3:55	4:09
3:17	3:35	3:48	3:54	4:07	4:11	4:20	4:34
3:47	4:05	4:18	4:24	4:37	4:41	4:50	5:04
4:17	4:35	4:48	4:54	5:07	5:11	5:20	5:34

Westbound *Al Oeste* (Approximate Times / *Tiempos Aproximados*)

LOS ANGELES	ECHO PARK	LOS ANGELES		WEST HOLLYWOOD		WEST LOS ANGELES	SANTA MONICA
8	7	6	5	4	3	2	1
Venice & Broadway	Sunset & Echo Park	Santa Monica / Vermont Station	Santa Monica & Western	Santa Monica & Fairfax	Santa Monica & San Vicente	Santa Monica & Westwood C	Ocean & Arizona
D4:07A	4:24A	4:33A	4:37A	4:47A	4:52A	5:03A	5:24A
4:34	4:49	4:58	5:02	5:13	5:18	5:29	5:50
4:55	5:11	5:21	5:25	5:36	5:41	5:53	6:14
5:16	5:32	5:42	5:46	5:57	6:02	6:15	6:36
5:34	5:52	6:02	6:07	6:18	6:23	6:36	6:57
5:55	6:13	6:23	6:28	6:40	6:45	7:00	—
6:16	6:34	6:45	6:49	7:01	7:07	7:22	—
6:34	6:53	7:04	7:09	7:21	7:27	7:44	—
6:53	7:12	7:24	7:29	7:42	7:48	8:05	—
7:13	7:32	7:44	7:49	8:02	8:09	8:26	—
7:30	7:50	8:02	8:07	8:21	8:28	8:45	—
7:48	8:08	8:20	8:25	8:39	8:46	9:03	—
8:05	8:25	8:38	8:43	8:57	9:04	9:21	—
8:22	8:42	8:55	9:00	9:15	9:22	9:39	—
8:37	8:57	9:11	9:17	9:32	9:40	9:58	—
8:52	9:12	9:26	9:32	9:48	9:56	10:14	—
9:06	9:27	9:41	9:47	10:03	10:11	10:29	—
9:20	9:42	9:56	10:02	10:19	10:27	10:45	—
9:33	9:55	10:10	10:17	10:34	10:43	11:01	—
9:48	10:10	10:25	10:32	10:49	10:58	11:16	—
10:02	10:24	10:40	10:47	11:04	11:13	11:31	—
10:15	10:38	10:55	11:02	11:20	11:29	11:47	—
10:30	10:53	11:10	11:17	11:35	11:44	12:02P	—
10:45	11:08	11:25	11:32	11:50	11:59	12:18	—
11:00	11:23	11:40	11:47	12:05P	12:14P	12:33	—
11:15	11:38	11:55	12:02P	12:20	12:29	12:48	—
11:29	11:52	12:09P	12:17	12:35	12:44	1:03	—
11:44	12:07P	12:24	12:32	12:51	1:00	1:20	—
11:57	12:22	12:39	12:47	1:06	1:15	1:35	—
12:11P	12:36	12:54	1:02	1:21	1:30	1:50	—
12:25	12:50	1:08	1:17	1:36	1:45	2:05	—
12:40	1:05	1:23	1:32	1:51	2:00	2:21	—
12:55	1:20	1:38	1:47	2:06	2:16	2:37	—
1:10	1:35	1:53	2:02	2:21	2:31	2:53	—
1:25	1:50	2:08	2:17	2:36	2:46	3:08	—
1:40	2:05	2:23	2:32	2:51	3:01	3:23	—
1:55	2:20	2:38	2:47	3:06	3:16	3:38	—
2:10	2:35	2:53	3:02	3:21	3:31	3:53	—
2:28	2:52	3:09	3:17	3:36	3:46	4:08	—
2:43	3:07	3:24	3:32	3:51	4:01	4:23	—
2:59	3:22	3:39	3:47	4:06	4:16	4:38	—
3:14	3:37	3:54	4:02	4:21	4:31	4:54	—
3:30	3:53	4:10	4:17	4:36	4:46	5:09	—
3:44	4:08	4:25	4:32	4:51	5:01	5:24	—
3:58	4:23	4:40	4:47	5:06	5:16	5:38	—
4:13	4:38	4:55	5:02	5:20	5:30	5:50	—
4:28	4:53	5:10	5:17	5:35	5:45	6:05	—
4:43	5:08	5:25	5:32	5:49	5:59	6:19	—
4:58	5:23	5:40	5:47	6:04	6:14	6:34	—
5:13	5:38	5:55	6:02	6:19	6:29	6:48	—
5:29	5:54	6:10	6:17	6:34	6:43	7:02	—
5:45	6:09	6:25	6:32	6:49	6:58	7:17	—
6:01	6:25	6:41	6:47	7:04	7:13	7:32	—
6:16	6:40	6:56	7:02	7:19	7:28	7:46	—
6:33	6:56	7:12	7:18	7:35	7:44	8:02	—
6:49	7:12	7:28	7:34	7:50	7:59	8:17	—
7:06	7:29	7:44	7:50	8:06	8:14	8:32	—
7:23	7:45	8:00	8:06	8:21	8:29	8:47	—
7:39	8:01	8:16	8:22	8:37	8:45	9:03	—
7:57	8:17	8:32	8:38	8:53	9:01	9:19	—
8:14	8:34	8:48	8:54	9:08	9:16	9:34	—
8:31	8:51	9:05	9:10	9:24	9:32	9:50	—
8:50	9:09	9:22	9:27	9:40	9:48	10:02	10:24P
9:08	9:27	9:39	9:44	9:57	10:05	10:23	—
9:25	9:44	9:56	10:01	10:14	10:22	10:35	10:57
9:42	10:01	10:13	10:18	10:31	10:38	10:51	11:13
9:59	10:18	10:30	10:35	10:48	10:55	11:07	11:29
10:17	10:36	10:47	10:52	11:05	11:12	11:24	11:45
10:36	10:54	11:05	11:09	11:21	11:28	11:40	12:01A
10:55	11:11	11:22	11:26	11:38	11:44	11:56	12:16
11:13	11:29	11:39	11:43	11:55	12:01A	12:12A	12:32
11:31	11:47	11:57	12:01A	12:13A	12:19	12:30	12:50
11:50	12:06A	12:16A	12:20	12:32	12:38	12:49	1:09
D12:06A	12:27	12:36	12:40	12:52	12:58	1:09	1:29
12:31	12:46	12:55	12:59	1:11	1:16	1:27	1:47
12:50	1:05	1:14	1:18	1:30	1:35	1:46	2:06
D1:06	1:25	1:34	1:38	1:49	1:54	2:05	2:25
1:40	1:55	2:04	2:08	2:19	2:24	2:35	2:55
D2:06	2:25	2:34	2:38	2:49	2:54	3:05	3:25
2:40	2:55	3:04	3:08	3:19	3:24	3:35	3:55
D3:06	3:25	3:34	3:38	3:49	3:54	4:05	4:25
3:40	3:55	4:04	4:08	4:19	4:24	4:35	4:55

Sunday and Holiday Schedules

Sunday & Holiday schedule in effect on New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

Horarios de domingo y días feriados

Horarios de domingo y días feriados en vigor para New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day y Christmas Day.

Nextrip

Text "metro" and your intersection or stop number to 41411 (example: metro vignes&cesarechavez or metro 1563). You can also visit metro.net or call 511 and say "Nextrip"

Nextrip

Envíe un mensaje de texto con "Metro" y la intersección de la calle o el número de su parada al 41411. Nextrip le enviará un mensaje de texto con la próxima llegada de cada autobús en esa parada. También puede visitar metro.net o llamar al 511 y decir "Nextrip"

Special Notes

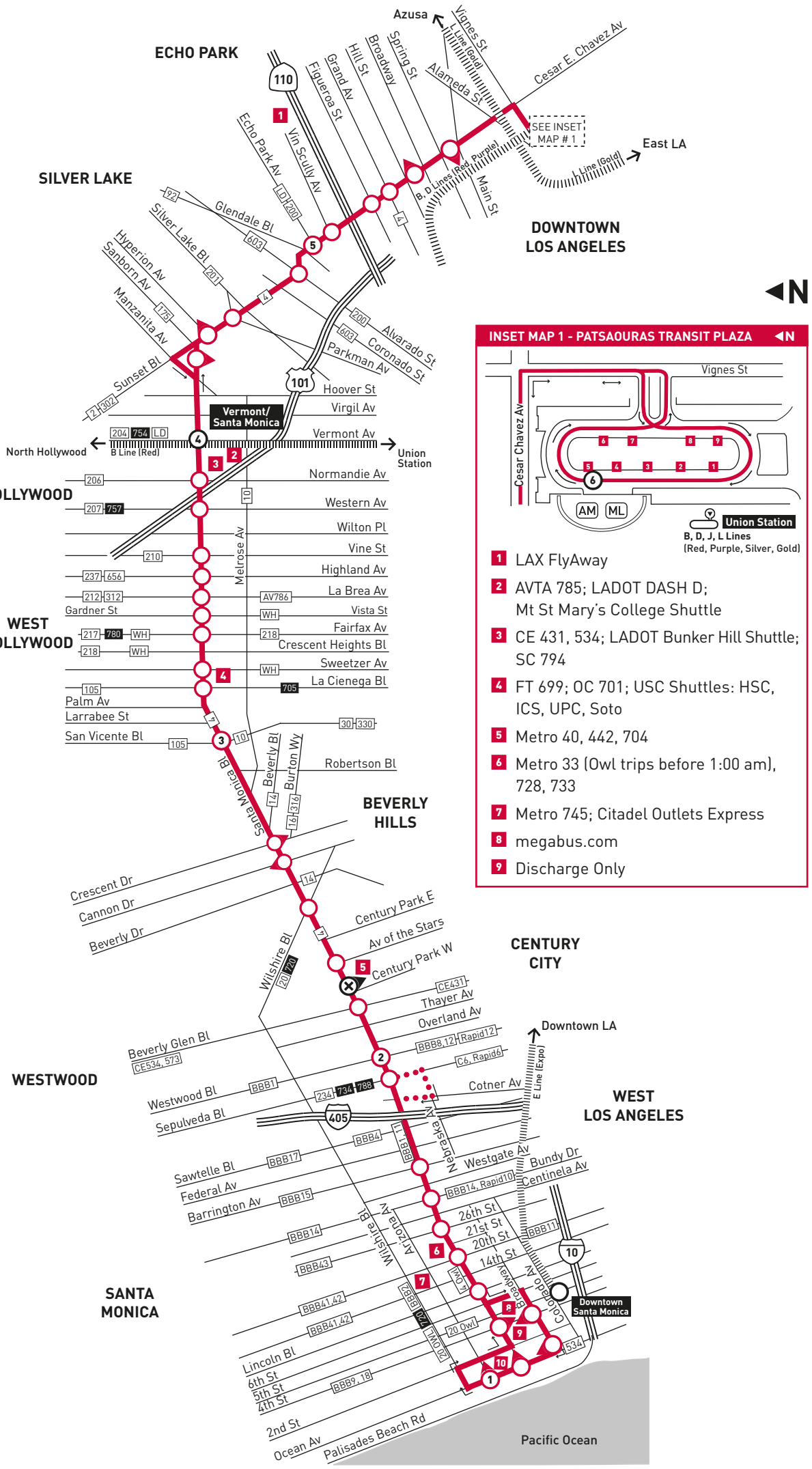
- **B** Trips shown originating at Santa Monica & Westwood begin service from Nebraska & Sepulveda 5 - 9 minutes before time shown.
- **C** Trips shown terminating at Santa Monica & Westwood continue to Nebraska & Sepulveda arriving approximately 2 - 5 minutes after time shown.
- **D** Waits at Broadway & 7th for transfer connection.

Avisos especiales

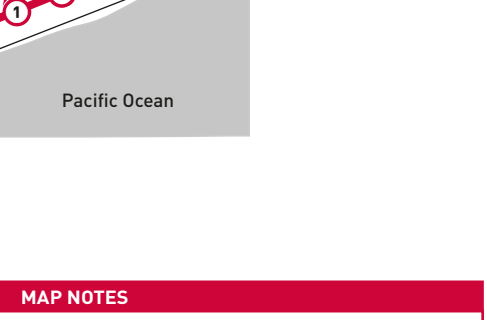
- **B** *Los viajes que se muestran originándose en Santa Mónica y Westwood empiezan el servicio desde Nebraska y Sepulveda 5 - 9 minutos antes de la hora mostrada.*
- **C** *Los viajes que se muestran terminando en Santa Mónica y Westwood continúan hacia Nebraska & Sepulveda llegando a aproximadamente 2 - 5 minutos después de la hora mostrada.*
- **D** *Espera en Broadway y 7th para las conexione de transferencia.*

EXHIBIT F

ROUTE MAP



INSET MAP 1 - PATSAOURAS TRANSIT PLAZA



1. LAX FlyAway
2. AVTA 785; LADOT DASH D; Mt St Mary's College Shuttle
3. CE 431, 534; LADOT Bunker Hill Shuttle; SC 794
4. FT 699; OC 701; USC Shuttles: HSC, ICS, UPC, Soto
5. Metro 40, 442, 704
6. Metro 33 (Owl trips before 1:00 am), 728, 733
7. Metro 745; Citadel Outlets Express
8. megabus.com
9. Discharge Only

LEGEND

- Line 704 Route
- Shortline Turnaround Loop at Nebraska & Sepulveda
- Rapid Stop
- Rapid Stop - Single Direction Only
- Rapid Stop Timepoint
- Metro Rail
- Metro Rail Station
- Metro Rail Station & Timepoint
- Temporary Stop Only
- ML — Metrolink
- AM — Amtrak
- AV — Antelope Valley Transit Authority
- BBB — Santa Monica's Big Blue Bus
- C — Culver CityBus
- FT — Foothill Transit
- CE — LADOT Commuter Express
- LD — LADOT DASH
- OC — Orange County Bus
- SC — Santa Clarita Transit
- WH — West Hollywood Cityline

MAP NOTES

1. **Dodger Stadium**
2. **Braille Institute**
3. **LA City College**
4. **West Hollywood City Hall**
5. **Westfield Century City**
   Note: (Use temporary stop at Eastbound Santa Monica Bl / Century Park West until construction is complete at Santa Monica Bl / Ave of the Stars)
   Metro 4, 16, 28, 316, 704, 728; AV 786; BBB5; C3; CE 534, 573; SC 792, 797
6. **St. John's Hospital**
7. **Santa Monica-UCLA Medical Center**
8. **Santa Monica Bl & 4th St / Broadway & 4th St**
   Metro 4 Owl, 20 Owl, 534, 704, 720
   BBB 1, 2, 3, 5, 7, 8, 9, 18; Rapid 3, 7, 10
9. **Third Street Promenade**
10. **Ocean Av & Arizona Av**
    Metro 4 Owl, 33 Owl, 534, 704, 733; BBB 8; Rapid 10

Monday through Friday

Effective Jun 21 2020

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Eastbound *Al Este* (Approximate Times/*Tiempos Aproximados*)

1 SANTA MONICA	2 WEST LOS ANGELES	3 WEST HOLLYWOOD	4 LOS ANGELES	5 ECHO PARK	6 DOWNTOWN LOS ANGELES
Ocean & Arizona	Santa Monica & Westwood	Santa Monica & San Vicente	Santa Monica & Vermont	Sunset & Echo Park	Patsaouras Bus Plaza / LA Union Station
7:13A	7:34A	7:49A	8:12A	8:21A	8:31A
7:40	8:03	8:18	8:41	8:50	9:01
8:04	8:28	8:44	9:08	9:18	9:28
8:28	8:53	9:09	9:34	9:44	9:55
8:50	9:16	9:32	9:59	10:10	10:21
9:21	9:47	10:04	10:31	10:42	10:53
9:41	10:07	10:24	10:51	11:02	11:13
10:06	10:32	10:50	11:19	11:30	11:41
10:29	10:55	11:14	11:44	11:55	12:06P
10:56	11:24	11:43	12:13P	12:24P	12:35
11:15	11:44	12:03P	12:35	12:47	12:58
11:36	12:06P	12:25	12:58	1:10	1:21
11:57	12:27	12:47	1:20	1:32	1:44
12:17P	12:47	1:07	1:41	1:53	2:05
12:36	1:06	1:26	2:00	2:12	2:24
12:55	1:26	1:46	2:20	2:32	2:44
1:15	1:46	2:06	2:40	2:52	3:04
1:35	2:06	2:26	3:00	3:12	3:24
1:52	2:24	2:45	3:20	3:32	3:44
2:13	2:46	3:07	3:42	3:54	4:06
2:34	3:07	3:28	4:03	4:14	4:26
2:58	3:31	3:52	4:27	4:38	4:50
3:16	3:49	4:10	4:45	4:56	5:08
3:36	4:09	4:30	5:04	5:15	5:27
4:01	4:33	4:54	5:28	5:39	5:51
4:26	4:58	5:19	5:52	6:03	6:14
4:52	5:22	5:43	6:16	6:27	6:38
5:14	5:42	6:03	6:36	6:47	6:58
5:36	6:02	6:22	6:55	7:06	7:17
6:02	6:29	6:48	7:20	7:31	7:42
6:23	6:50	7:09	7:40	7:51	8:02
6:47	7:12	7:31	8:01	8:11	8:21
7:14	7:39	7:57	8:25	8:34	8:43
7:40	8:04	8:21	8:49	8:58	9:07
8:06	8:29	8:45	9:11	9:20	9:28
8:33	8:55	9:11	9:36	9:45	9:53
9:00	9:20	9:36	10:00	10:09	10:17
9:24	9:44	10:00	10:24	10:33	10:41
9:48	10:08	10:24	10:48	10:56	11:04
10:12	10:32	10:48	11:12	11:20	11:28
10:38	10:57	11:13	11:37	11:45	11:53
11:03	11:22	11:38	12:01A	12:09A	12:17A
11:30	11:49	12:05A	12:26	12:34	12:42

Westbound *Al Oeste* (Approximate Times/*Tiempos Aproximados*)

6 DOWNTOWN LOS ANGELES	5 ECHO PARK	4 LOS ANGELES	3 WEST HOLLYWOOD	2 WEST LOS ANGELES	1 SANTA MONICA
Patsaouras Bus Plaza / LA Union Station	Sunset & Echo Park	Santa Monica & Vermont	Santa Monica & San Vicente	Santa Monica & Westwood	Ocean & Arizona
6:41A	6:51A	7:00A	7:20A	7:32A	7:51A
7:16	7:26	7:36	7:58	8:13	8:32
7:41	7:52	8:02	8:25	8:40	9:02
8:03	8:14	8:24	8:49	9:04	9:26
8:25	8:36	8:46	9:11	9:26	9:49
8:46	8:57	9:07	9:34	9:50	10:15
9:09	9:20	9:30	9:59	10:15	10:41
9:29	9:40	9:51	10:20	10:36	11:02
9:49	10:00	10:12	10:41	10:57	11:24
10:08	10:19	10:31	11:01	11:17	11:45
10:28	10:39	10:51	11:21	11:37	12:05P
10:48	10:59	11:12	11:43	11:59	12:29
11:08	11:19	11:32	12:05P	12:22P	12:52
11:27	11:38	11:51	12:24	12:42	1:13
11:46	11:57	12:11P	12:44	1:02	1:33
12:07P	12:18P	12:32	1:05	1:23	1:54
12:27	12:38	12:52	1:25	1:43	2:14
12:46	12:57	1:11	1:44	2:02	2:33
1:05	1:17	1:31	2:05	2:24	2:55
1:25	1:37	1:51	2:26	2:45	3:17
1:49	2:01	2:15	2:48	3:07	3:37
2:13	2:25	2:39	3:11	3:30	4:00
2:33	2:45	2:59	3:31	3:50	4:20
2:53	3:05	3:19	3:50	4:09	4:39
3:15	3:27	3:41	4:11	4:29	4:59
3:40	3:52	4:06	4:36	4:54	5:23
4:07	4:18	4:31	5:01	5:19	5:48
4:32	4:43	4:56	5:26	5:42	6:09
4:57	5:08	5:21	5:50	6:06	6:31
5:23	5:34	5:46	6:15	6:31	6:56
5:49	6:00	6:12	6:41	6:57	7:24
6:17	6:28	6:40	7:09	7:25	7:50
6:45	6:56	7:08	7:37	7:53	8:16
7:15	7:26	7:37	8:04	8:18	8:40
7:43	7:54	8:05	8:32	8:46	9:06
8:11	8:22	8:33	8:59	9:13	9:33
8:42	8:52	9:02	9:28	9:42	10:01
9:12	9:22	9:32	9:58	10:12	10:29
9:47	9:57	10:06	10:32	10:46	11:03

Saturday, Sunday and Holiday Schedule

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Eastbound *Al Este* (Approximate Times/*Tiempos Aproximados*)

SANTA MONICA	WEST LOS ANGELES	WEST HOLLYWOOD	LOS ANGELES	ECHO PARK	DOWNTOWN LOS ANGELES
1	2	3	4	5	6
Ocean & Arizona	Santa Monica & Westwood	Santa Monica & San Vicente	Santa Monica & Vermont	Sunset & Echo Park	Patsaouras Bus Plaza / LA Union Station
7:17A	7:36A	7:49A	8:11A	8:20A	8:30A
7:46	8:05	8:18	8:41	8:50	9:01
8:03	8:24	8:37	9:01	9:11	9:22
8:32	8:54	9:07	9:31	9:41	9:52
8:58	9:20	9:34	9:59	10:10	10:21
9:28	9:50	10:04	10:31	10:42	10:53
9:46	10:08	10:24	10:51	11:02	11:12
10:13	10:36	10:52	11:19	11:30	11:40
10:39	11:02	11:18	11:46	11:57	12:08P
11:05	11:29	11:45	12:13P	12:24P	12:35
11:22	11:46	12:02P	12:31	12:43	12:54
11:40	12:06P	12:22	12:51	1:03	1:14
12:03P	12:30	12:46	1:16	1:28	1:39
12:19	12:46	1:02	1:32	1:44	1:55
12:43	1:10	1:26	1:56	2:08	2:19
1:00	1:27	1:43	2:14	2:26	2:37
1:27	1:53	2:10	2:41	2:53	3:04
1:45	2:11	2:28	2:59	3:11	3:22
2:03	2:29	2:46	3:17	3:29	3:39
2:27	2:53	3:10	3:41	3:53	4:03
2:48	3:14	3:31	4:02	4:13	4:23
3:13	3:39	3:59	4:29	4:40	4:51
3:36	4:02	4:18	4:47	4:58	5:09
3:51	4:17	4:33	5:03	5:14	5:25
4:20	4:46	5:02	5:32	5:43	5:54
4:38	5:04	5:20	5:50	6:01	6:12
5:05	5:31	5:47	6:17	6:28	6:38
5:19	5:45	6:01	6:31	6:42	6:52
5:41	6:07	6:23	6:53	7:04	7:13
6:10	6:36	6:52	7:20	7:30	7:39
6:32	6:57	7:13	7:40	7:50	7:59
6:55	7:19	7:35	8:01	8:11	8:20
7:22	7:44	7:59	8:24	8:34	8:42
7:46	8:08	8:23	8:48	8:57	9:05
8:10	8:32	8:47	9:12	9:21	9:29
8:34	8:56	9:11	9:36	9:45	9:53
9:03	9:23	9:37	10:00	10:09	10:17
9:28	9:48	10:02	10:24	10:33	10:41
9:54	10:13	10:26	10:48	10:56	11:04
10:18	10:37	10:50	11:12	11:20	11:28
10:42	11:01	11:14	11:36	11:44	11:52
11:08	11:26	11:39	11:59	12:08A	12:16A
11:34	11:52	12:05A	12:26A	12:34	12:42

Westbound *Al Oeste* (Approximate Times/*Tiempos Aproximados*)

DOWNTOWN LOS ANGELES	ECHO PARK	LOS ANGELES	WEST HOLLYWOOD	WEST LOS ANGELES	SANTA MONICA
6	5	4	3	2	1
Patsaouras Bus Plaza / LA Union Station	Sunset & Echo Park	Santa Monica & Vermont	Santa Monica & San Vicente	Santa Monica & Westwood	Ocean & Arizona
6:41A	6:51A	7:00A	7:20A	7:32A	7:50A
7:16	7:26	7:36	7:58	8:10	8:28
7:45	7:56	8:07	8:30	8:42	9:00
8:02	8:13	8:24	8:47	8:59	9:19
8:21	8:32	8:43	9:07	9:20	9:42
8:40	8:51	9:02	9:26	9:40	10:03
9:10	9:21	9:32	9:58	10:12	10:36
9:29	9:40	9:52	10:18	10:32	10:56
9:49	10:00	10:12	10:38	10:53	11:19
10:08	10:19	10:31	10:59	11:14	11:41
10:27	10:38	10:51	11:22	11:37	12:04P
10:46	10:57	11:11	11:41	11:57	12:26
11:07	11:18	11:32	12:02P	12:18P	12:47
11:27	11:38	11:51	12:21	12:37	1:06
11:46	11:57	12:11P	12:41	12:57	1:26
12:06P	12:17P	12:31	1:01	1:17	1:46
12:26	12:37	12:51	1:21	1:37	2:07
12:46	12:57	1:11	1:41	1:57	2:27
1:06	1:17	1:31	2:01	2:17	2:47
1:26	1:37	1:51	2:21	2:37	3:07
1:50	2:01	2:15	2:45	3:02	3:32
2:14	2:25	2:39	3:09	3:26	3:54
2:30	2:41	2:55	3:26	3:43	4:11
2:53	3:04	3:18	3:49	4:06	4:34
3:11	3:22	3:36	4:07	4:24	4:52
3:38	3:49	4:03	4:34	4:50	5:18
4:10	4:21	4:34	5:05	5:21	5:49
4:33	4:44	4:57	5:27	5:42	6:09
4:57	5:08	5:21	5:49	6:04	6:29
5:26	5:37	5:50	6:17	6:32	6:56
5:49	6:00	6:13	6:40	6:54	7:18
6:22	6:33	6:46	7:14	7:28	7:52
6:45	6:56	7:09	7:37	7:51	8:15
7:14	7:25	7:38	8:04	8:17	8:39
7:42	7:53	8:06	8:32	8:45	9:06
8:13	8:24	8:36	9:02	9:15	9:36
8:46	8:57	9:08	9:30	9:43	10:04
9:15	9:26	9:37	9:59	10:12	10:33
9:45	9:56	10:07	10:29	10:41	11:00

Sunday & Holiday Schedules

Sunday & Holiday schedule in effect on New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day.

Horarios de domingo y días feriados

Horarios de domingo y días feriados en vigor para New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day y Christmas Day.

Nextrip

Text "metro" and your intersection or stop number to 41411 (example: metro vignes&cesarechavez or metro 1563). You can also visit metro.net or call 511 and say "Nextrip"

Nextrip

Envíe un mensaje de texto con "Metro" y la intersección de la calle o el número de su parada al 41411. Nextrip le enviará un mensaje de texto con la próxima llegada de cada autobús en esa parada. También puede visitar metro.net o llamar al 511 y decir "Nextrip"