Final Initial Study/Negative Declaration

450 North Roxbury Drive Project

October 2024

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1.0 INTRODUCTION

1.1 Statutory Authority and Requirements

An application for the proposed 450 North Roxbury Drive Project (Project) has been submitted to the City of Beverly Hills Planning Division for discretionary review. The City of Beverly Hills (City), as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and that preparation of an Initial Study is required.

This Initial Study evaluates the potential environmental effects that could result from the construction and operation of the Project. This Initial Study has been prepared in accordance with CEQA (California Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.).

1.2 Summary of Findings

Pursuant to CEQA Guidelines Section 15367, the City, as Lead Agency, has the authority for environmental review and adoption of the environmental documentation, in accordance with CEQA. Because the Project proposes an increase in density (as further described in **Section 2.0, Project Description**), the Project does not qualify for a Class 5 Categorical Exemption pursuant to CEQA Guidelines Section 15305, thereby triggering the need for an Initial Study leading to a Negative Declaration (IS/ND). This Initial Study has evaluated the environmental issues outlined as part of the CEQA Guidelines Appendix G Environmental Checklist Form. It provides decision-makers and the public with information concerning the Project's potential environmental effects and recommended mitigation measures, if any.

Based on the Environmental Checklist Form and supporting environmental analysis, the Project would have no impact or a less than significant impact concerning all environmental issue areas. As set forth in CEQA Guidelines Section 15070(a), an IS/ND can be prepared when the Initial Study identifies no substantial evidence, in light of the whole record before the agency, that the Project may have a significant effect on the environment.

1.3 Initial Study Public Review Process

Pursuant to Section 15071 of the CEQA Guidelines, this IS/ND will be circulated for public review and shall include:

a) A brief description of the project, including a commonly used name for the project, if any (see **Section 2.0, Project Description**);

b) The location of the project, preferably shown on a map, and the name of the project proponent (see **Section 2.0, Project Description**);

c) A proposed finding that the project will not have a significant effect on the environment; (see **Section 3.0, Lead Agency Determination**, and environmental analysis provided in **Section 4.0, Evaluation of Environmental Impacts**);

d) An attached copy of the Initial Study documenting reasons to support the finding (see City website listed below); and

e) Mitigation measures, if any, included in the project to avoid potentially significant effects (not applicable).

The Notice of Intent (NOI) to adopt a Negative Declaration has been provided to the Clerk of the County of Los Angeles and mailed to responsible and trustee agencies concerned with the Project and other public agencies with jurisdiction by law over resources affected by the Project. A 20-day public review period from September 11, 2024 through October 1, 2024 has been established for the IS/ND in accordance with CEQA Guidelines Section 15073. During the public review period, the IS/ND, including the Technical Appendices, was made available for review on the City website, at https://www.beverlyhills.org/environmental.

Written comments on this IS/ND may be sent to:

Minjee Hahm, AICP, Associate Planner
City of Beverly Hills, Planning Division
455 North Rexford Drive
Beverly Hills, CA 90210
Email: mhahm@beverlyhills.org

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation may be required. If not or if the issues raised do not provide substantial evidence that the Project would have a significant effect on the environment, the IS/ND will be considered for adoption and the Project for approval.

1.4 Incorporation by Reference

Pursuant to CEQA Guidelines Section 15150, an IS/ND may incorporate by reference all, or portions of, another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the IS/ND's text.

The documents outlined below, which were utilized during preparation of this IS/ND, are hereby incorporated by reference and are available for review on the City's website, at:

Beverly Hills General Plan. The City adopted its comprehensive General Plan (General Plan) in 2010. Since adopting the General Plan, the General Plan's 2021-2029 Housing Element was adopted in October 2021, and the Safety Element was amended in May 2022. The General Plan outlines the City's goals, plans, and objectives for land use within the City's jurisdiction.

- Found at: https://www.beverlyhills.org/1067/General-Plan-Document

Beverly Hills Municipal Code. The Beverly Hills Municipal Code (BHMC) regulates municipal affairs within the City's jurisdiction including, without limitation, the building and zoning regulations (i.e., BHMC Title 9, Building and Property Health and Safety Regulations, and Title 10, Planning and Zoning). BHMC Title 10 is the primary tool for implementing the General Plan and coordinating and controlling the development and use of real property throughout the City. The BHMC is referenced throughout this IS/ND to establish the Project's baseline regulatory requirements.

- Found at: https://codelibrary.amlegal.com/codes/beverlyhillsca/latest/beverlyhills_ca/0-0-0-1

1.5 Report Organization

This document is organized into the following sections:

Section 1.0: Introduction provides a Project introduction and overview, cites the CEQA Guidelines to which the proposed Project is subject, and summarizes the IS/ND's conclusions.

Section 2.0: Project Description details the Project's location, environmental setting, background and history, characteristics, discretionary actions, construction program, phasing, agreements, and required permits and approvals. This Section also identifies the IS/ND's intended uses, including a list of anticipated permits and other approvals.

Section 3.0: Lead Agency Determination provides the determination of the Project and an overview of potential impacts that may or may not result from Project implementation.

Section 4.0: Evaluation of Environmental Impacts provides an analysis of environmental impacts identified in the environmental checklist.

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2.0 PROJECT DESCRIPTION

2.1 Location

The Project would redevelop a 6,797 square foot portion of the ground floor of a five-floor, partially subterranean parking garage (the upper two levels are above ground) with rooftop parking located at 450 North Roxbury Drive to retail space. The five-floor parking garage is attached to a 10-story, 155-foot-tall office building located on the northern portion of the same parcel, constructed in 1970. The parking garage and office building together are considered the Project Site; however, the remainder of the parking garage and the attached office building would not be redeveloped as part of this Project. The Project Site is in the southwestern portion of the City of Beverly Hills (City), in Los Angeles County (County), approximately 3.0 miles north of Culver City and 8.5 miles west of downtown Los Angeles; see **Figure 2-1: Regional Vicinity Map**.

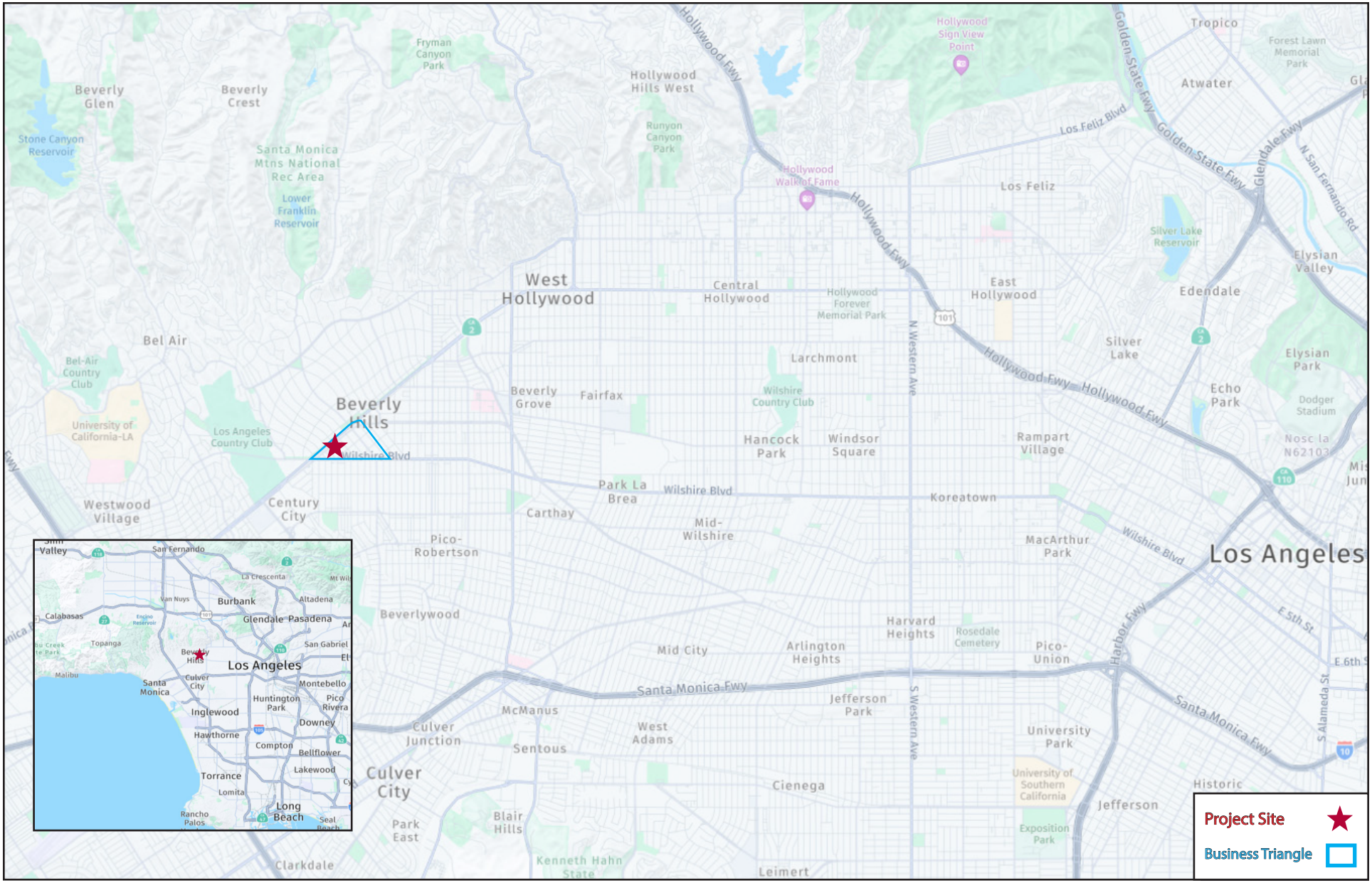
The Project Site is bound by South Santa Monica Boulevard to the north, Bram Goldsmith Way (an alley) to the east, an existing commercial building to the south, and North Roxbury Drive to the west. The Project Site is located on a 0.8-acre parcel (Assessor's Parcel Number [APN] 4343-024-020). The Project Site is located within the Business Triangle, which is defined in BHMC Section 10-3-2703 as the area bounded by the centerline of Wilshire Boulevard, the centerline of Santa Monica Boulevard (south roadway), and the centerline of the alley between Canon Drive and Crescent Drive; see **Figure 2-2: Local Vicinity Map**. The Project Site is located at the intersection of South Santa Monica Boulevard and North Roxbury Drive. Regional access to the Project Site is provided via Interstate 10 (I-10) and Interstate 405 (I-405). Local access is generally provided via Santa Monica Boulevard (State Route 2 or SR-2) to the north of the Project Site and Wilshire Boulevard to the south of the Project Site.

2.2 Environmental Setting

2.2.1 On-Site Conditions

The office building consists of retail tenants on the ground floor and office and medical suites on the remaining nine floors. The office building and parking garage were constructed in 1970 and represent a modern and late interpretation of the Corporate International style. The building and parking garage were evaluated for historical significance and were determined to not be individually eligible for listing in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or as a Beverly Hills Landmark.[1] The Project would focus development within the ground story of a five-story parking garage with three levels above grade (including rooftop parking) and two subterranean levels. The parking garage currently comprises 96,850 square feet with a floor area ratio (FAR) of 2.65 and contains 365 parking spaces across the five stories. The ground floor of the parking garage contains a total of 56 parking spaces, comprised of 34 single spaces, 14 tandem spaces, and 8 Americans with Disabilities Act (ADA) spaces. The parking garage is currently open to the public.

[1] Architectural Resources Group, 450 N. Roxbury Drive Historical Resource Assessment and Project Impacts Analysis, April 23, 2024.



SOURCE: Nearmap, 2024

FIGURE 2-1: Regional Vicinty Map

450 NORTH ROXBURY DRIVE PROJECT

Kimley»Horn

SOURCE: Google Earth, 2024

FIGURE 2-2: Local Vicinty Map

450 NORTH ROXBURY DRIVE PROJECT

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The Project Site is approximately 258 to 260 feet above mean sea level (amsl) and is relatively flat. Planter walls are provided along the North Roxbury Drive street frontage. The Project Site is accessed via two in/out driveways on North Roxbury Drive guarded by parking barriers. Pedestrian access is provided via an existing sidewalk along North Roxbury Drive.

2.2.2 General Plan and Zoning

The Project Site has a General Plan land use designation of Commercial (Low Density General). The maximum allowable density in this land use designation is a FAR of 2.0, and the maximum allowable height is 45 feet.

The Project Site is zoned C-3 Commercial. According to BHMC Section 10-3-1601, principal uses permitted in this Zone include various commercial uses such as café, office, parking garage, store, shop for the conducting of wholesale or retail business, and store.

2.2.3 Surrounding Land Uses

The Project Site is located in a fully urbanized area of the City and is primarily surrounded by commercial and office development in the Business Triangle. On-site and surrounding land uses and zoning are further detailed in **Table 2.2-1: On-site and Surrounding Land Uses**.

Table 2.2-1: On-site and Surrounding Land Uses

Description	Existing On-the-Ground[1]	Land Use Designation[2]	Zoning[3]
Project Site	Five-story parking garage (three above-grade levels, two subterranean levels) and 10-story office building	Commercial (Low Density General)	C-3 Commercial
North	South Santa Monica Boulevard, commercial buildings	Commercial (Low Density General)	C-3 Commercial
South	Commercial and office buildings	Commercial (Low Density General)	C-3 Commercial
East	Bram Goldsmith Way, commercial and office buildings, parking garage	Commercial (Low Density General)	C-3 Commercial
West	North Roxbury Drive, commercial and office buildings	Commercial (Low Density General)	C-3 Commercial
Business Triangle	Commercial and office buildings	Commercial (Low Density General), Commercial (Medium Density Commercial), Specific Plan – Beverly Hills Gardens	C-3 Commercial, BE-O-PD Entertainment Office Planned Development Overlay Zone; Beverly Hills Garden Specific Plan

1. Google Earth Pro, 2024.
2. City of Beverly Hills, General Plan Land Use Designations – Beverly Hills, January 25, 2022, https://www.beverlyhills.org/DocumentCenter/View/1105/General-Plan-Land-Use-Map-PDF?bidId=. Accessed August 5, 2024.
3. City of Beverly Hills, Zoning Map, October 5, 2021, https://www.beverlyhills.org/DocumentCenter/View/5101/Zoning-Map-PDF. Accessed June 26, 2024.

Public transit access in proximity to the Project Site includes the Los Angeles County Metropolitan Transportation Authority (Metro) Line 20 bus stop at the intersection of Wilshire Boulevard and North Linden Drive, located approximately 400 feet southwest of the Project Site; the Metro Line 4 bus stop at the intersection of Santa Monica Boulevard and North Camden Drive, located approximately 600 feet northeast of the Project Site; and the Metro Line 720 bus stop at the

intersection of Wilshire Boulevard and Santa Monica Boulevard, located approximately 740 feet southwest of the Project Site. The Project Site is also approximately 0.31 miles northwest of the future Metro D Line Wilshire/Rodeo Station, which slated to open in 2026.[2]

2.3 Project Characteristics

2.3.1 Project Overview

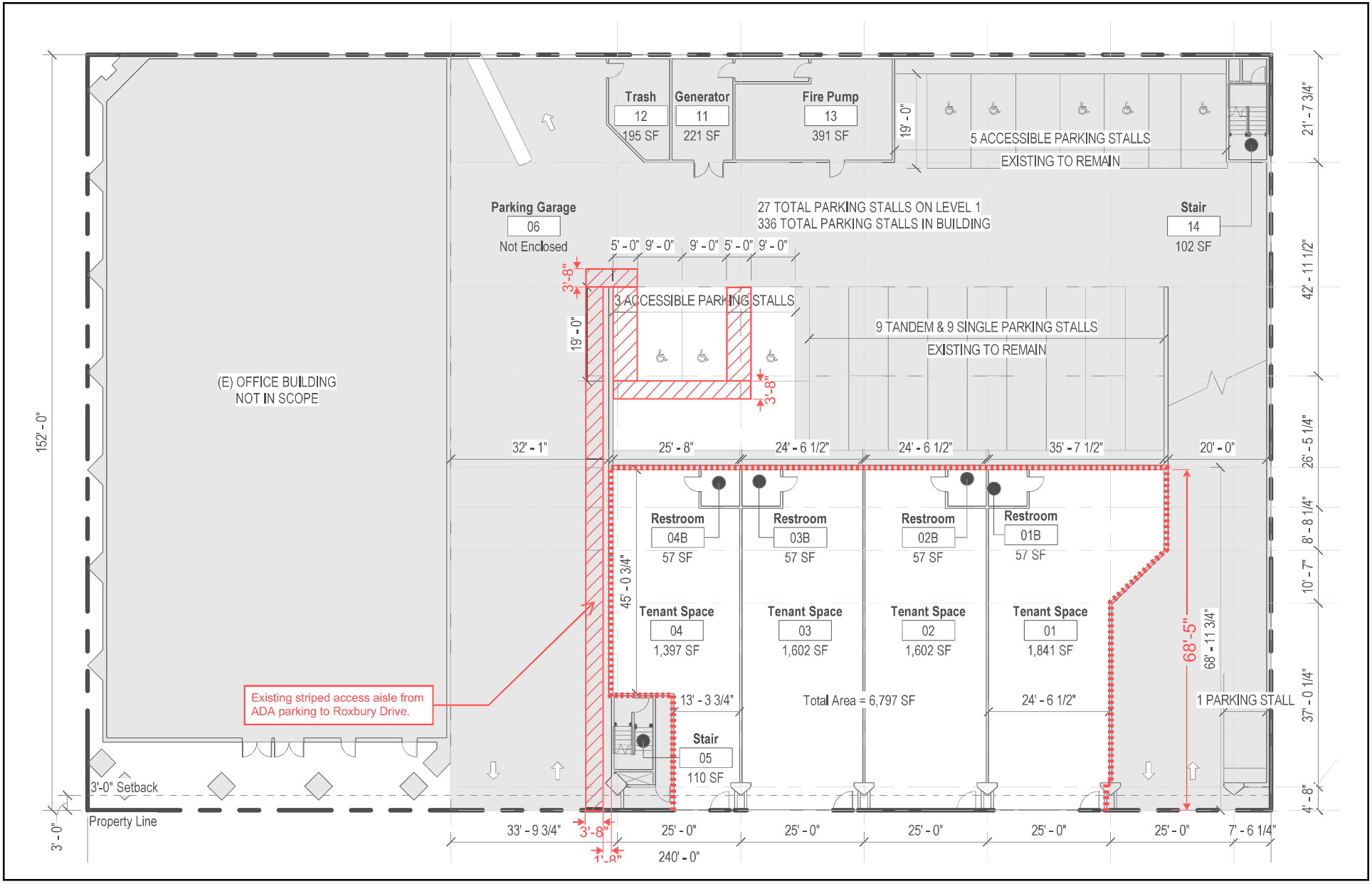
The Applicant, 450 Roxbury II Manager, LLC, proposes to convert a portion of the ground level of the existing parking garage to approximately 6,797 square feet of retail space. The Project would remove 29 existing parking spaces, add 300 square feet of planter area, and restripe the remaining ground level of parking to replace the 3 removed ADA parking spaces; see **Figure 2-3: Conceptual Site Plan**. The Applicant is requesting a Zone Text Amendment (ZTA) and General Plan Amendment (GPA) to allow an increase in the maximum FAR as a result of the conversion of the ground level of an existing parking structure abutting a public street to retail business(es), as defined in BHMC Section 10-3-100, up to a depth of 70 feet from the front property line, subject to approval of a Development Plan Review pursuant to BHMC Section 10-3-3100.[3] Refer to **Section 2.3.6, Proposed ZTA and GPA**, for additional information regarding the proposed ZTA and GPA.

2.3.2 Site Design

The proposed 6,797 square feet of retail uses would be split into four retail spaces ranging from 1,397 square feet to 1,841 square feet. The four retail spaces would be accessed from the North Roxbury Drive street frontage. The storefront facades would consist of louvers, cast-in-place (CIP) concrete, and storefront glazing. Signage would be installed on top of the storefronts; see **Figure 2-4: Project Rendering Fronting North Roxbury Drive**. Approximately 300 square feet of planter area would be added. The Project would increase the floor area for the parcel from 96,850 square feet to 103,647 square feet and increase the FAR from 2.65 to 2.84.

[2] Los Angeles County Metropolitan Transportation Authority (Metro), Westside Purple Line Extension Section 2 Project December 2023 Quarterly Project Status Report, 2023, https://libraryarchives.metro.net/DPGTL/StatusReports/2023-december-westside-purple-line-extension-section-2.pdf. Accessed June 10, 2024.

[3] The ZTA and GPA would apply to the entire Business Triangle of the City; however, future projects that would seek to utilize the ZTA and GPA would be subject to environmental review at such time.



SOURCE: HLW International LLP, 2024

FIGURE 2-3: Conceptual Site Plan

450 NORTH ROXBURY DRIVE PROJECT

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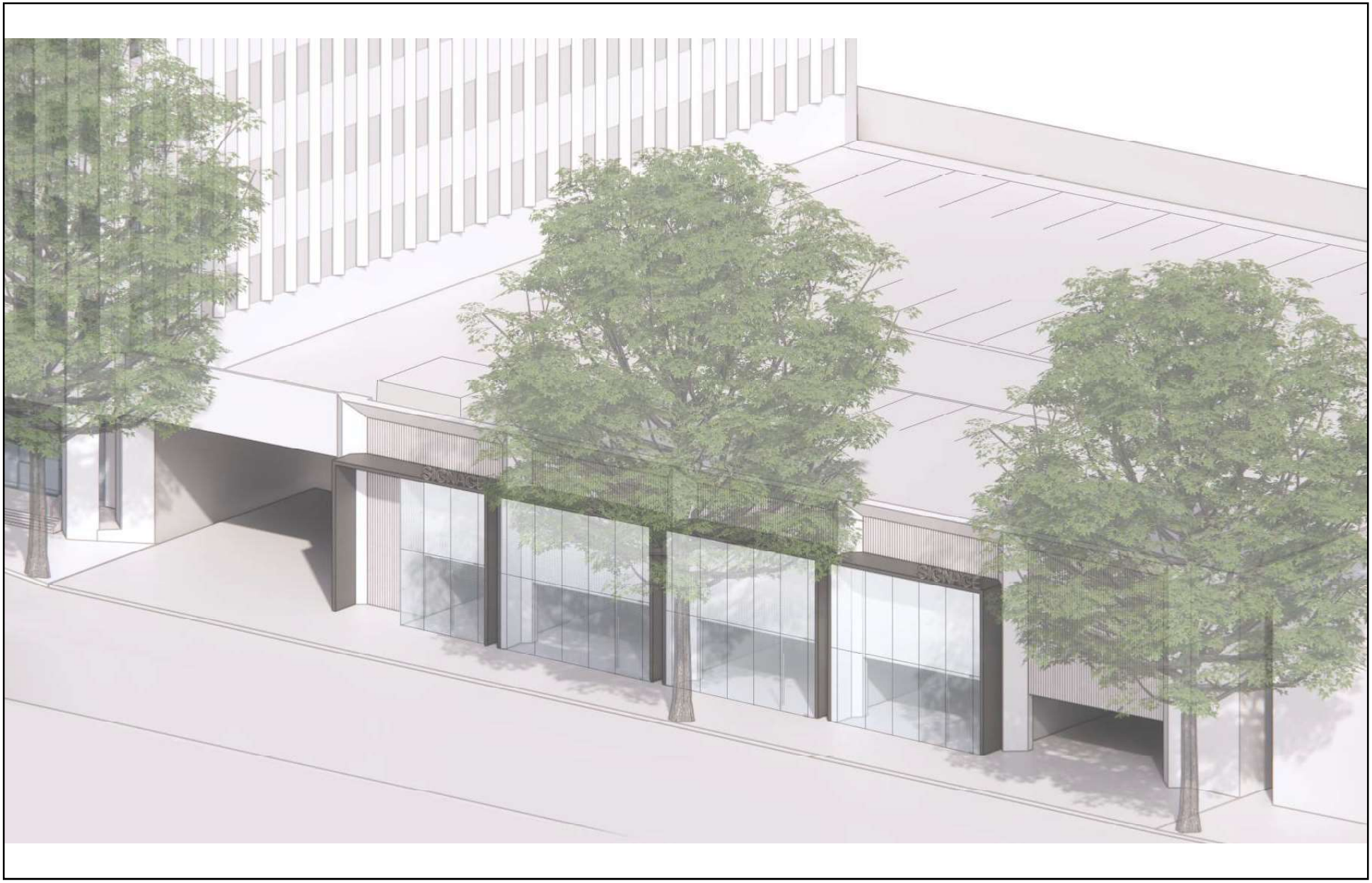


SOURCE: HLW International LLP, 2024

FIGURE 2-4: Project Rendering Fronting North Roxbury Drive

2.3.3 Access, Circulation, and Parking

Per BHMC Section 10-3-2730, the Project would be required to provide one parking space per 350 square feet of commercial floor area, for a total of 20 additional spaces. However, Assembly Bill (AB) 2097 (2022) (Government Code Section 65863.2) prohibits public agencies or cities from imposing a minimum automobile parking requirement on most development projects located within a half-mile radius of an existing or planned major transit stop. Pursuant to AB 2097, as the Project Site is approximately 0.31 miles northwest of the future Metro D Line Wilshire/Rodeo Station, the Project is eligible for automobile parking reduction. The Project would eliminate 29 existing parking spaces (which includes 24 single parking spaces and 5 tandem parking spaces) on the ground floor and restripe and replace 3 ADA parking spaces, resulting in a total of 335 parking spaces throughout the entire parking garage; see **Table 2.3-1: Ground Floor Project Parking**. The proposed total of parking spaces for the entire parking garage would allow the parking garage to continue to provide sufficient parking for the public. The three relocated ADA parking spaces would be located adjacent to the northeastern end of the proposed retail spaces. The existing parking spaces on the other floors of the parking garage would remain.

Table 2.3-1: Ground Floor Project Parking

Parking Spaces	Existing Parking	Proposed Parking[1]
Total Single Spaces	34	10
Total Tandem Spaces	14	9
Total ADA Spaces	8	8
Total Spaces	56	27

Vehicular access to the Project Site would continue to be provided via the two existing in/out driveways on North Roxbury Drive. Pedestrian access would continue to be provided via the existing sidewalk along North Roxbury Drive. The Project would not modify the existing driveways and sidewalk.

2.3.4 Security

Both existing driveways would continue to be secured by existing parking barriers that require visitors to press a button for a ticket to enter the parking garage. The Project would also include security measures such as security lighting and a surveillance camera system.

2.3.5 Infrastructure and Utilities Improvements

A new mechanical split heating, ventilation, and air conditioning (HVAC) system would be installed above the ceilings of the retail spaces. A new rooftop HVAC unit would be provided immediately south of an existing HVAC unit on the rooftop. The Project would also install four 5-ton heat pump condensers along the western edge of the rooftop. Actual equipment size and clearances will be determined upon finalization of site plans and is subject to review by the City. Ducting and piping for the proposed HVAC system would be cored through the concrete curb at the edge of the rooftop of the parking garage down to ground level and distributed to each retail space as required.

An automated sprinkler system would be installed throughout the retail spaces for fire protection purposes, including a fire pump on the eastern portion of the Project Site. The Project would be a Type I-B construction, which is a type of construction in which building elements are fire resistive and non-combustible.

2.3.6 Proposed ZTA and GPA

The Project would include a ZTA and GPA to allow sites located within the Business Triangle (as defined in **Section 2.2.3, Surrounding Land Uses**) to increase their maximum FAR as a result of the conversion of the ground level of an existing parking structure abutting a public street to retail business(es), as defined in BHMC Section 10-3-100, up to a depth of 70 feet from the front property line, subject to approval of a Development Plan Review pursuant to BHMC Section 10-3-3100. The additional floor area of the conversion shall not exceed 10 percent of the maximum allowable floor area for the site, regardless of the existing building square footage. In compliance with the proposed ZTA and GPA, the Project is proposing a conversion of 6,797 square feet of an existing parking structure, resulting in a new total of 103,647 square feet of proposed floor area. Pursuant to BHMC Section 10-3-2745, the maximum allowable floor area for the Project Site is 72,960 square feet. Therefore, the 6,797 square feet conversion is approximately 9.3 percent of the maximum allowable floor area (72,960 square feet) and would be less than 10 percent of the maximum allowable floor area for the site.

There are a few sites within the Business Triangle that may potentially utilize the ZTA and GPA to increase their maximum FAR by converting the ground level of their existing parking structure to retail business(es). As the additional floor area for conversion would not be allowed to exceed 10 percent of the maximum allowable floor area for the site, regardless of the existing building square footage, these developments would be considered minor but would be subject to approval of a Development Review Plan pursuant to BHMC Section 10-3-3100. As the application of the ZTA and GPA to other potential sites within the Business Triangle is not reasonably foreseeable at this time, those projects, should it be submitted as a formal application to the City, would require a project-specific CEQA analysis at that time. As such, although the proposed ZTA and GPA apply to the entire Business Triangle, the Project Site for the proposed Project is confined only to the parking garage and office building located within the Project parcel, as described above in **Section 2.1, Location**.

2.4 Project Construction

Project construction is anticipated to occur over one phase, lasting approximately 14 months, beginning as early as January 2025 and ending as early as February 2026. Construction would occur consistent with City noise policies, as presented in BHMC Section 5-1-205. Specifically, construction would occur Monday through Friday, excluding holidays, between 8:00 A.M. and 6:00 P.M, and on Saturdays only if an after hours construction permit is issued pursuant to BHMC 5-1-205.C. No grading or excavation will be required to construct the Project.

2.5 Agreements, Permits, and Approvals

The City, as Lead Agency, has discretionary authority over the proposed Project. To implement this Project, at a minimum, the following discretionary permits/approvals must be granted by the City and others:

- Zone Text Amendment to allow for a FAR above the City's 2.0 FAR limitation,
- General Plan Amendment to allow for a FAR above the City's 2.0 FAR limitation for the proposed additional floor area,
- Development Plan Review,
- Adoption of this Negative Declaration,
- Architectural Review, and
- Issuance of building permits.

3.0 LEAD AGENCY DETERMINATION

On the basis of this initial evaluation:

I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	X
I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed Project MAY have a significant effect on the environment and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed Project MAY have a potentially significant or a potentially significant unless mitigated impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier 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.	

City of Beverly Hills

Minjee Hahm, AICP
Associate Planner

September 11, 2024
Date

4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The following environmental analysis is patterned after CEQA Guidelines Appendix G**.** An explanation is provided for all responses, which are supported by the cited information sources. The responses consider the whole action involved with the proposed Project: on- and off-site, Project- and cumulative-level, direct and indirect, and short-term construction and long-term operational. The explanation of each issue also identifies the significance criteria or threshold, if any, used to evaluate each question, and the mitigation identified, if any, to avoid or reduce the impact to less than significant. To each question, there are four possible responses:

- **No Impact.** The Project would not have any measurable environmental impact.
- **Less Than Significant Impact.** The Project would have the potential to impact the environment, although this impact would be below-established thresholds that are considered to be significant.
- **Less Than Significant With Mitigation Incorporated.** The Project would have the potential to generate impacts, which may be considered as a significant effect on the environment, although mitigation measures or changes to the Project's physical or operational characteristics could reduce these impacts to a less than significant level.
- **Potentially Significant Impact.** The Project could have impacts, which may be considered significant, and therefore additional analysis is required to identify mitigation. A determination that there is a potential for significant effects indicates the need to more fully analyze the Project's impacts and identify mitigation.

4.1 Aesthetics

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?				X
c) If in a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Impact Analysis

4.1a Would the project have a substantial adverse effect on a scenic vista?

No Impact. Under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly-valued landscape for the public's benefit. The Project Site is currently developed with a parking garage, office building, and associated minimal landscaping. The Project Site is within a fully urbanized area of the City dominated by commercial and office development. Overall Project Site topography is relatively flat. The City does not have clearly defined scenic vistas, and no scenic views currently exist on-site or are available from the Project Site. The Santa Monica Mountains to the north may be visible from the streets surrounding the Project Site and from the rooftop of the parking garage on-site, but views are limited by multi-story development and street trees surrounding the Project Site.

The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The proposed development is within the footprint of the existing parking garage on-site. As such, upon Project development, views of the Santa Monica Mountains would continue to be blocked within the Project Site and along North Roxbury Drive and Bram Goldsmith Way. The Project would not directly obstruct an existing public view of a scenic vista as no scenic vistas are in the Project Site vicinity. Similarly, although the Project proposes a ZTA and GPA to allow for a FAR above the City's FAR limitation, because there are no scenic vistas visible from the Business

Triangle, the associated ZTA and GPA would similarly have no impact on any scenic vistas. Therefore, Project development, including the adoption of the associated ZTA and GPA for the Business Triangle, would not result in a substantial adverse effect on a scenic vista. No impacts would occur.

4.1b Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?

No Impact. There are no State-designated scenic highways in the City.[4] The nearest eligible scenic highway is State Route 1 (SR-1) located approximately 5.8 miles southwest of the Project Site, and the nearest officially designated scenic highway is the portion of SR-2 located within the Angeles National Forest, approximately 9.9 miles west of the Project Site.

The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The proposed development would be contained within the ground floor of the existing parking garage on-site. Therefore, due to the Project Site's distance from State scenic highways, the Project would not damage scenic resources. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which would also not impact State scenic highways due to the Business Triangle's distance from State scenic highways. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not damage scenic resources within a State scenic highway. No impacts would occur.

4.1c If in a non-urbanized area, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project Site is in an urbanized area of the City; therefore, the applicable threshold with respect to the Project is whether the Project is consistent with applicable zoning and other regulations governing scenic quality.

Pursuant to BHMC Section 10-3-1601, principal uses permitted in this zone include various commercial uses such as parking garage, store, shop for the conducting of wholesale or retail business, and studio. The Project Site's land use and zoning designations (Commercial [Low Density General] and C-3 Commercial, respectively) permit a maximum FAR of 2.0. Additionally, the Commercial (Low Density General) land use designation permits a maximum building height of 45 feet.

The Project proposes to convert a portion of the ground floor of the existing parking garage on-site to include new tenant spaces for retail businesses, which would be consistent with the

[4] California Department of Transportation, California State Scenic Highway System Map, 2019, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed on June 13, 2024.

permitted uses of the C-3 Commercial zone. The Applicant is requesting a ZTA and GPA to allow the Project to increase the floor area of the Project parcel from 96,850 square feet to 103,647 square feet and increase the FAR from 2.65 to 2.84.

The Project would be designed in accordance with the land use and zoning development standards outlined in the City's General Plan Land Use Element and BHMC. Upon City approval of the proposed ZTA and GPA and the City's development review of the proposed site plans, the Project would not conflict with zoning or other regulations governing scenic quality. Similarly, other development within the Business Triangle that may potentially utilize the associated ZTA and GPA would be required to comply with the ZTA and GPA, upon adoption, along with other City requirements. Therefore, impacts would be less than significant.

4.1d Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. Existing outdoor lighting at and near the Project Site is associated with the existing parking garage on-site, surrounding office and commercial buildings and parking, and street lighting along North Roxbury Drive typical of urbanized areas. New light sources introduced by the Project may increase ambient nighttime illumination levels.

Construction

Pursuant to BHMC Section 5-1-205, construction would occur Monday through Friday, excluding holidays, between 8:00 A.M. and 6:00 P.M., and on Saturdays only if an after hours construction permit is issued. While the majority of Project construction would occur during daylight hours, there is a potential that construction could require the use of artificial lighting, particularly during the winter season when daylight is no longer sufficient earlier in the day. To the extent artificial light sources are required, such use would be temporary and would cease upon completion of Project construction. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with BHMC light intensity requirements. Additionally, as part of the Project, construction lighting would be shielded to minimize light spillover. Construction lighting, while potentially bright, would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing comprised of a solid material or including screening would be placed along the periphery of the Project Site's street frontage along North Roxbury Drive to screen construction activity from street view at off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which would also be required to apply with BHMC regulations regarding light intensity and glare.

Based on the above, light and glare associated with Project construction activities would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, impacts related to light and glare during construction would be less than significant.

Operation

The Project would introduce new sources of light and glare that are typically associated with retail uses, including architecture, interior, security, and wayfinding lighting sources. However, all Project lighting would comply with current energy standards and codes, while providing efficient and effective on-site lighting. Nighttime security lighting for the Project would be provided to illuminate storefront entrances and within the parking structure. The nearest sensitive receptors in the vicinity of the Project Site are the residential communities approximately 350 feet northwest of the Project Site. However, all exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses and security lighting would be designed to prevent light trespass onto adjacent properties. It is not anticipated that the amount of light emanating from the Project would represent a noticeable increase over current light levels.

The Project would include appropriate levels of interior and exterior lighting for security and architectural highlighting. Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project in accordance with BHMC lighting regulations that require that operational lighting would be directed downward or on the specific on-site feature to be lit and avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses.

Regarding glare, daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic trim. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Similar to the existing development at the Project Site, sun reflection from the Project would occur during periods in which the sun is low on the horizon and when the point of reflection within the Project Site is in front of the driver, in the direction of travel. No sources of substantial glare are anticipated with implementation of the proposed retail development. Exterior building materials of the proposed retail uses would use various non-reflective material designed to minimize the transmission of glare from the Project's buildings and would not include polished metals. The Project building would be prohibited from using highly reflective building materials such as mirrored glass on exterior facades. Parking would remain within the parking garage, thereby reducing potential nighttime glare from vehicles. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which would be required to comply with BHMC lighting and glare regulations.

Based on the above, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant.

4.2 Agricultural and Forestry Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Impact Analysis

4.2a Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

4.2b Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

4.2c 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))?

4.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?

4.2e Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The Project Site is developed with an existing parking garage and office building and is located in an urbanized area of the City. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The proposed ZTA and GPA would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

According to the California Department of Conservation's California Important Farmland Finder, the Project Site is mapped as Urban and Built-Up Land. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance is mapped within or in the immediate vicinity of the Project Site.[5] Further, there is no land under a Williamson Act contract in the City.[6] There is also no forest land within or in the vicinity of the Project Site. Additionally, the Project Site is zoned C-3 Commercial. No agricultural, forest land, or timberland zoning exists in the City.[7] Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which is developed with commercial and office uses and does not contain any agricultural or forestry resources or zoning. Therefore, no impact concerning mapped farmlands, Williamson Act contracts, or agricultural, forest, or timber land zoning would occur.

[5] California Department of Conservation (DOC), California Important Farmland Finder, 2022, https://maps.conservation.ca.gov/dlrp/ciff/. Accessed on June 12, 2024.

[6] DOC, California Williamson Act Enrollment Finder, 2022, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/. Accessed on June 12, 2024.

[7] City of Beverly Hills, Zoning Map – City of Beverly Hills, 2021, https://www.beverlyhills.org/DocumentCenter/View/5101/Zoning-Map-PDF. Accessed June 12, 2024.

4.3 Air Quality

This Section is based on the *Air Quality Analysis* prepared by Kimley-Horn, which is included in its entirety as **Appendix A: Air Quality Analysis.**

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

Impact Analysis

4.3a Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

As part of its enforcement responsibilities, the U.S. Environmental Protection Agency (EPA) requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Ambient Air Quality Standards (CAAQS) require an air quality attainment plan to be prepared for areas designated as nonattainment regarding the state and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the South Coast Air Basin, which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which the South Coast Air Basin is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 Air

Quality Management Plan (AQMP) and 2022 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2022 AQMP builds upon measures already in place from previous AQMPs. The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 8-hour ozone (O_3) National Ambient Air Quality Standard (NAAQS). Air quality management planning is a regional and multi-agency effort including the SCAQMD, the California Air Resources Control Board (CARB), the Southern California Association of Governments (SCAG), and the U.S. EPA. The AQMPs' pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's growth projections and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's 2016 and 2022 AQMPs.

Criteria for determining consistency with the AQMPs are defined by the following indicators:

- **Consistency Criterion No. 1**: The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs.
- **Consistency Criterion No. 2**: The Project will not exceed the assumptions in the AQMPs or increments based on the years of the Project build-out phase.

According to the SCAQMD's CEQA Air Quality Handbook, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.

The violations to which Consistency Criterion No. 1 refers are exceedances of the CAAQS or NAAQS. As shown below, the Project would not exceed the construction or operational standards. Therefore, the Project would not result in an increase in frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs. Thus, the Project would be consistent with the AQMP under the first criterion.

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's growth forecasts included in the 2020-2045 RTP/SCS. SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans. The Project is consistent with the City of Beverly Hills General Plan land use designation for the Project Site and, therefore, the growth associated with the Project at the Project Site has been accounted for in SCAG's latest growth forecasts. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.

As shown below in Threshold 4.3b, the air pollutant emissions resulting from Project implementation would not exceed the SCAQMD localized significance thresholds. Localized significance thresholds were developed to ensure no exceedances of the California or federal ambient air quality standards would occur if project emissions were below thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including volatile organic compounds [VOC], nitrous oxides [NO_X], carbon monoxide [CO], sulfur dioxides [SO_X], particulate matter 10 microns or less in diameter [PM10], and particulate matter 2.5 microns or less in diameter [PM2.5]), the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, the Project would be consistent with employment growth projections in the AQMP.

Additionally, regarding the associated ZTA and GPA for the Business Triangle, that other potential development that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be similar in nature and scale to the proposed development for this Project as they would be allowed to increase the FAR up to an additional 10 percent of the maximum allowable floor area for the site. Therefore, these other potential development projects would likely have similar air quality emissions and would therefore likely not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs. Additionally, these projects would be required to complete a project-specific CEQA analysis at that time. Thus, these other potential development projects would be consistent with the AQMP under the first criterion. Additionally, these other potential development projects would also be required to be consistent with the City's General Plan land use designation for their respective sites. Through compliance with the City's General Plan land use designation, the growth associated with these projects would also be accounted for in SCAG's latest growth forecasts.

Based on the above, approval of the Project, including the adoption of the associated ZTA and GPA, would not result in any significant effects relating to a conflict with or obstruction of the implementation of the SCAQMD's AQMP. Therefore, impacts would be less than significant.

4.3b 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?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

<u>Regional Construction Impacts</u>

Construction associated with the proposed Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone-precursor pollutants (i.e., reactive organic gases [ROG] and NO_X, PM10, and PM2.5). Construction-generated emissions are short term and of temporary duration, lasting only as long

as construction activities occur, but would be considered a significant air quality impact if the amount of pollutants generated exceeds the SCAQMD's thresholds of significance. Sources of emissions during construction include motor vehicle exhaust associated with construction equipment and worker trips and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation grading activities as well as weather conditions and the appropriate application of water. However, the Project would not include site preparation or grading activities. Sensitive land uses surrounding the Project Site consist mostly of a church and residential communities located approximately 350 feet northwest of the Project Site.

The duration of construction activities for the Project is estimated to be approximately 14 months, beginning as early as January 2025 and ending as early as February 2026. The Project would convert existing parking area on the ground floor of an existing parking structure to retail uses and relocate three existing ADA parking spaces, resulting in a total construction area of approximately 0.16 acres.

Construction-generated emissions associated with the Project were calculated using the CARB-approved California Emissions Estimator Model (CalEEMod), which is designed to model emissions for land use development projects, based on typical construction requirements. See **Appendix A** for more information regarding the construction assumptions used in this analysis. Predicted maximum daily construction-generated emissions for the Project are identified in **Table 4.3-1: Project Construction Emissions**. The modeling emissions include truck idling time and emissions from heavy-duty diesel equipment.

Table 4.3-1: Project Construction Emissions

Calendar Year	Emissions (pounds per day)[1]					
	ROG	NO_X	CO	SO_2	PM10	PM2.5
2025	0.53	5.19	7.11	0.01	0.35	0.21
2026	3.27	4.86	7.04	0.01	0.23	0.18
Maximum Emissions	***3.27***	***5.19***	***7.11***	***0.01***	***0.35***	***0.21***
SCAQMD Threshold	75	100	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

1. Emissions were calculated using the CalEEMod version 2022.1, as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.

Source: CalEEMod version 2022.1; see **Appendix A** for model outputs.

The Project is subject to SCAQMD Rules 402, 403, and 1113, which prohibit nuisances, require dust mitigation, and limit VOC content in paints, respectively. It has been assumed that these rules will be followed using watering the site and low VOC paints during construction. The results of the emissions modeling, as summarized on Table 4.3-1, show that construction criteria

pollutant emissions would remain below the applicable thresholds, and construction impacts on short-term regional air quality would be less than significant.

Regional Operational Impacts

Operational emissions are typically associated with mobile sources (i.e., motor vehicle use) and area sources (such as the use of landscape maintenance equipment, hearths, consumer products, and architectural coatings). Energy source emissions would be generated from electricity and natural gas non-hearth) usage. **Table 4.3-2: Project Operational Emissions** summarizes the operational emissions attributable to the Project. As shown in Table 4.3-2, the Project's regional operational emissions would not exceed applicable SCAQMD thresholds, and operational impacts on long-term regional air quality would be less than significant.

Table 4.3-2: Project Operational Emissions

Source	Emissions (pounds per day)[1]					
	ROG	NO_X	CO	SO_2	PM10	PM2.5
Area	0.21	<0.005	0.30	<0.005	<0.005	<0.005
Energy	<0.005	0.01	0.01	<0.005	<0.005	<0.005
Mobile	1.16	0.83	8.58	0.02	1.78	0.46
Total	**1.37**	**0.84**	**8.88**	**0.02**	**1.78**	**0.46**
SCAQMD Threshold	55	55	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

1. Emissions were calculated using the CalEEMod version 2022.1, as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.
2. Totals may not add up due to rounding.

Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs.

Regarding the associated ZTA and GPA for the Business Triangle, given that other potential development projects that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be similar in nature and scale to the proposed development for this Project, construction and operational air quality emissions for such projects would likely be similar as those for this Project. Additionally, these other potential development projects would be subject to the same SCAQMD regulations pertaining to VOCs. As such, the adoption of the associated ZTA and GPA would also not result in a cumulatively considerably net increase of any criteria pollutant for which the South Coast Air Basin is non-attainment under the NAAQS or CAAQS, and impacts would be less than significant.

Therefore, for the reasons substantiated above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the South Coast Air Basin is non-attainment under the NAAQS or CAAQS. Impacts would be less than significant.

4.3c Would the Project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Localized Construction Impacts

The nearest sensitive receptors to the Project Site are a church and community of single-family residences located approximately 350 feet (approximately 100 meters) to the northwest. To assess potential impacts to nearby sensitive receptors, the SCAQMD established Localized Significance Thresholds (LSTs). LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) to assist lead agencies in analyzing project-specific localized impacts.

CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment. However, the Project would not require any site preparation or grading activities. Therefore, because the Project disturbance area is less than one acre, the LSTs for a one-acre site has been used in this construction analysis.

LSTs were established for NO_X, CO, PM10, and PM2.5, based on project size and local ambient air pollutant levels, as determined by Source Receptor Area (SRA). For this Project, the appropriate SRA for LSTs is the Northwest Coastal LA County (SRA 2). Thus, the applicable LSTs for a 1.0 acre site in SRA 2 were used in this analysis.

SCAQMD's methodology indicates that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. The LSTs for 1.0 acre site with receptors at 100 meters were used for the construction analysis. **Table 4.3-3: Localized Significance of Emissions** presents the results of localized emissions modeling for construction activity. Emissions of these pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, construction impacts on regional air quality would be less than significant.

Localized Operational Impacts

According to the SCAQMD localized significance threshold methodology, LSTs apply to on-site sources. LSTs for receptors located at 100 meters for SRA 2 were conservatively used in this analysis. The 1.0-acre LST threshold was used for the Project Site. The operational emissions include all on-site Project-related stationary sources (i.e., area and energy sources). As shown on Table 4.3-3, the maximum daily emissions during operations would not exceed applicable LSTs,

and are not expected to result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, operational impacts would be less than significant.

Table 4.3-3: Localized Significance of Emissions

Source/Activity	Emissions (pounds per day)[1]			
	NO_X	CO	PM10	PM2.5
Construction Emissions				
Demolition 2025	4.3	5.6	0.2	0.2
Building Construction 2025	5.1	6.9	0.2	0.2
Building Construction 2026	4.8	6.9	0.2	0.2
Architectural Coating 2026	0.9	1.1	<0.1	<0.1
Maximum Daily Emissions	*5.1*	*6.9*	*0.2*	*0.2*
SCAQMD Localized Screening Threshold (1.0 acres of disturbance at 100 meters)	121	1,233	27	8
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Operational Emissions				
On-site Emissions (Area + Energy Sources)	<0.1	0.3	<0.1	<0.1
SCAQMD Localized Screening Threshold (1.0 acres of disturbance at 100 meters)	121	1,233	7	2
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

1. Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in **Appendix A.**

Source: CalEEMod version 2022.1. Refer to **Appendix A** for model outputs.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service (LOS) of an intersection from Project-related traffic would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined in the South Coast Air Basin.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 AQMP. The Basin was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent AQMP that addresses CO concentrations. As part of the SCAQMD CO Hotspot analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well

below the 35 ppm federal standard. The Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot spot analysis as the Project would generate 370 net daily vehicle trips. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced in the Project vicinity. Therefore, impacts on regional air quality would be less than significant.

Regarding the associated ZTA and GPA for the Business Triangle, given that other potential development projects that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be similar in nature and scale to the proposed development for this Project, localized construction and operational air quality impacts for such projects would likely be similar as those for this Project, and would also likely not generate the volume of traffic required to generate a CO hot spot. As such, the adoption of the associated ZTA and GPA would also not expose sensitive receptors to substantial pollutant concentrations.

For the reasons expounded above, the Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

4.3d Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Construction

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

Odors may be generated during construction activities such as, equipment diesel exhaust, architectural coatings, VOCs, and paving activities. However, these odors would be temporary, are not expected to affect a substantial number of people and would disperse rapidly. Therefore, impacts related to odors associated with the Project's construction-related activities would be less than significant.

Regarding the associated ZTA and GPA for the Business Triangle, given that other potential development projects that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be similar in nature and scale to the proposed development for this Project, odor impacts for such development projects would be similar to that for the Project. It is likely that such development projects would also include construction

odors that would be temporary. Therefore, impacts related to odors associated with the adoption of the ZTA and GPA would be less than significant.

Operations

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, the Project would not create objectionable odors and no impact would occur.

Additionally, given that such development projects that may take advantage of the ZTA and GPA would only involve the conversion of the ground floor of existing parking structures to retail businesses, such development projects would also not include any land uses that have been identified by the SCAQMD as odor sources. As such, the adoption of the associated ZTA and GPA would also not create objectionable odors, and no impact would occur.

Overall, for the reasons substantiated above, Project impacts would be less than significant.

4.4 Biological Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

Impact Analysis

4.4a Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The Project Site is occupied by an existing parking garage and office building. The Project Site contains minimal landscaping in the form of planter walls on the Project Site's street frontage along north Roxbury Drive. The Project Site is in an urbanized area of the City and is surrounded by commercial uses. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which

would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

A review of the California Department of Fish and Wildlife (CDFW) California Natural Biodiversity Database (CNDDB) QuickView Tool found 14 threatened or endangered wildlife species in the Beverly Hills Quadrangle, which is the Project Site's quadrangle.[8] The 14 species are listed in **Table 4.4-1: Species in the Vicinity of the Project Site**.

Table 4.4-1: Species in the Vicinity of the Project Site

Common Name	Scientific Name
Amphibians	
Western Spadefoot	*Spea hammondii*
Birds	
California Condor	*Gymnogyps californianus*
Western Snowy Plover	*Charadrius nivosus nivosus*
Coastal California Gnatcatcher	*Polioptila californica californica*
Least Bells Vireo	*Vireo bellii pusillus*
Swainson's Hawk	*Buteo swainsoni*
Fish	
Tidewater Goby	*Eucyclogobius newberryi*
Insects	
Monarch - California overwintering population	*Danaus plexippus plexippus pop. 1*
Crotchs Bumble Bee	*Bombus crotchii*
Vascular Plants	
Brauntons Milk-vetch	*Astragalus brauntonii*
Ventura Marsh Milk-vetch	*Astragalus pycnostachyus var. lanosissimus*
Coastal Dunes Milk-vetch	*Astragalus tener var. titi*
Salt Marsh Birds-beak	*Chloropyron maritimum ssp. maritimum*

Source: CDFW, CNDDB QuickView Tool, 2024, https://apps.wildlife.ca.gov/bios6/?tool=cnddbqv.

There is currently no native habitat within or near the Project Site to support the listed species above. The Project Site is either out of range for these species or would not provide suitable habitat due to its highly disturbed nature and the fact that the Project Site is located in a highly urbanized area. Additionally, no natural biological resources or communities are present within, adjacent to, or in the vicinity of the Project Site. The ZTA and GPA associated with the Project would only affect development within the Business Triangle, which is developed with commercial and office uses and therefore also does not include any native habitat. Therefore, the Project, including adoption of the associated ZTA and GPA for the Business Triangle, would not result in 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. There would be no impact.

[8] California Department of Fish and Wildlife (CDFW), California Natural Biodiversity Database QuickView Tool, 2023, https://apps.wildlife.ca.gov/bios6/?tool=cnddbqv. Accessed June 12, 2024.

4.4b Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

4.4c Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is fully developed with an existing parking garage and office building and is in an urbanized area of the City. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. According to the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory, no riparian habitats or wetlands are present on or adjacent to the Project Site.[9] The nearest identified wetland is a freshwater emergent wetland located approximately 0.7-mile southwest of the Project Site in the City of Los Angeles. The ZTA and GPA associated with the Project would only affect development within the Business Triangle, which is developed with commercial and office uses and does not contain or is near any riparian habitats. Therefore, the Project, including adoption of the associated ZTA and GPA for the Business Triangle, would not have an adverse effect on riparian habitat or other sensitive natural community or on State or federally protected wetlands. No impacts would occur.

4.4d 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?

No Impact. The Project Site is fully developed, surrounded by urban development, and is not part of an established wildlife corridor. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. Project development would occur within the Project Site and would not impact the movement of any native wildlife species. The Project Site currently contains minimal landscaping in the form of planter walls. The Project proposes to add approximately 300 square feet of planter area. It is unlikely that the existing or proposed landscaping would provide suitable habitat for any native resident or wildlife species. The ZTA and GPA associated with the Project would only affect development within the Business Triangle, which is also developed with commercial and office uses and is therefore not part of an established wildlife corridor. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. No impacts would occur.

[9] United States Fish and Wildlife Service, National Wetlands Inventory, 2021, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed on June 12, 2024.

4.4e Would the project conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. Provisions for the removal and planting of trees and landscaping in private property is addressed in BHMC Sections 10-3-2900 through 10-3-2906, which requires that persons desiring to remove trees from their own private property shall apply for a tree removal permit. The Project Site is entirely developed with a five-level parking garage consisting of two subterranean levels and three above-grade levels (including rooftop parking) and a 10-story office building. There is currently minimal landscaping within the Project Site in the form of planter walls on the Project Site's street frontage along North Roxbury Drive. No trees exist within the Project Site; as such, no trees would be removed from the Project Site as a result of Project development. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle that would convert the ground level of an existing parking structure to retail businesses. The proposed ZTA and GPA would be applicable to the Project Site for the Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria for purposes of converting existing street level parking into retail use. However, as these other potential sites would similarly convert the ground level of a parking structure to retail business, it would similarly not require the removal of trees. As such, the proposed ZTA and GPA would not result in the removal of any trees. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not conflict with local policies or ordinances protecting biological resources, including the City's tree preservation policies. There would be no impact.

4.4f Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. No portions of the City are located within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.[10,11] Therefore, the Project would not result in conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which is not within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. As such, there would be no impact.

[10] CDFW, NCCP Plan Summaries, 2023, https://wildlife.ca.gov/conservation/planning/nccp/plans. Accessed June 12, 2024.
[11] Data Basin, Habitat Conservation Plan (HCP), California, https://databasin.org/maps/new/#datasets=c116dd0d32df408cb44ece185d98731c. Accessed June 12, 2024.

4.5 Cultural Resources

This Section is based on the Historical Resource Assessment and Project Impacts Analysis (Historical Resource Assessment) prepared by Architectural Resources Group (ARG) on April 2024 and peer reviewed by the City in April 2024; Archaeological Resources Assessment, prepared by Kimley-Horn in September 2024, which are included in their entirety in **Appendix B: Historical Resources Assessment and Project Impacts Analysis** and **Appendix C: Archaeological Resources Assessment**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			X	
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

Impact Analysis

4.5a Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

CEQA Guidelines Section 15064.5(a) generally defines a historic resource as a resource that is: (1) listed in, or eligible for listing in the California Register of Historic Resources (California Register); (2) listed in a local register of historical resources (as defined in Section 5020.1(k) of the PRC); (3) identified as significant in a historical resources survey meeting the criteria in Section 5024.1(g) of the PRC; and/or (4) determined to be a historical resource by a project's lead agency. Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be historically significant if the resource meets the criteria for listing on the California Register of Historical Resources (California Register).

The Project Site is developed with an existing parking garage that is attached to a commercial office building within the same parcel. The parking garage and office building were constructed

in 1970 and therefore meets the State-recommended threshold under which buildings may be eligible for listing in the National Register of Historic Places (National Register) if they are at least 50 years of age.

According to the Historical Resources Assessment prepared for the Project, the existing parking garage on-site and attached office building were constructed in 1970 during which Beverly Hills experienced an economic boom in the years following World War II. The parking garage and office building were originally owned and occupied by Kaplan, Livingston, Goodwin, Berkowitz, and Selvin, a now-defunct entertainment law firm. The property is currently owned by Starpoint Properties. In a Beverly Hills Architectural Commission Report prepared by City Planning staff on April 17, 2019, the subject property is noted as a potentially eligible historic resource. The report states that "The building appears to be an eligible historic resource as a potential contributor to an eligible post-war historic commercial district…" The report does not provide information related to the boundaries of the district, when or how the district was identified, or under which registration criteria or level of significance (under the National Register, California Register, or Beverly Hills Register of Historic Properties [Beverly Hills Register]) the district is eligible for designation. Because the subject property was cited as eligible by City staff as a potential contributor to an eligible postwar historic district in 2019, ARG did not re-evaluate the property for eligibility as a district contributor. Rather, it is conservatively being treated as a contributor to the potential district and the district as a historical resource under CEQA.

The parking garage and office building do not appear to be individually eligible for listing the National Register, California Register, or Beverly Hills Register. While the parking garage and office building are more than 45 years old (Beverly Hills Landmark Designation Criterion A.1) and retain substantial integrity as defined by the National Park Service (Beverly Hills Landmark Designation Criterion A.3), research failed to: associate them with events that have made a significant contribution to broad patterns of history (National Register and California Register Criteria A/1); associate them with the lives of any persons significant to local, California, or U.S. history (National Register and California Register Criteria B/2); identify distinctive characteristics of a type period, or method of construction, or that represents the work of a master, or that possess high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction (National Register, California Register, and Beverly Hills Landmark Designation Criteria C/3/A.2); identify whether the parking garage and office building have yielded or may likely yield information important to prehistory or history (National Register and California Register Criteria D/4); or identify whether the parking garage or office building have continued historic value to the community such that its designation as Beverly Hills Landmark is reasonable and necessary to promote and further the purposes of the City's Historic Preservation Ordinance (Beverly Hills Register Criterion A.4). While the subject property meets Beverly Hills Register Criteria A.1 and A.3, it does not meet Beverly Hills Landmark Designation Criteria A.2 and A.4. Because a property must satisfy all four Part A eligibility criteria for consideration as a Beverly Hills Landmark in the City, the parking garage and office building are not eligible for local designation and has thus not been evaluated under Part B eligibility criteria.

Because the historical resource as defined by CEQA is the postwar commercial historic district and not the individual parking garage and office building, the focus of the analysis provided herein is the potential material impairment of the subject property as a district contributor and

the ability of the historic district to continue to convey its significance after completion of the Project.

The Project would not result in the demolition of the parking garage or office building. The Project proposes changes to the exterior of the parking garage, including removal of original aluminum screens/panels and raised planters in four bays fronting North Roxbury Drive and the installation of four glazed retail storefront assemblies. However, the overall height, form, massing, setbacks, design, and majority of the property's original features and materials (i.e. its simplified grid pattern, vertical concrete piers, and size/pattern of its window and garage bays, as noted in the 2019 Architectural Commission Report), would remain. No changes would be made to the exterior of the office building under the Project.

Because the Project would preserve the vast majority of the parking garage's and office building's extant historic materials and features, the parking garage and office building would retain the physical characteristics that account for their potential eligibility as a contributor to the eligible postwar commercial historic district identified by City staff in 2019.

Additionally, the Project proposes a ZTA and GPA to allow for additional floor area for the conversion to not exceed 10 percent of the maximum allowable floor area for the site. The associated ZTA and GPA would only affect development within the Business Triangle. Other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use and should they meet the criteria, would be subject to the same CEQA requirements as the Project, and potential impacts to historic resources would be evaluated as part of those projects' environmental analysis. The ZTA and GPA would only be for the proposed additional floor area within the ground floor of the parking garage, which would likely not result in modifications that would result in the building losing its potential eligibility as a contributor. As such, the adoption of the ZTA and GPA would have a less than significant impact on historical resources.

Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not cause a substantial adverse change in the significance of a historical resource, and impacts would be less than significant.

4.5b Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The records search conducted for the Archaeological Resources Assessment at the South Central Coastal Information Center (SCCIC) on June 27, 2024 identified 24 cultural resources studies that have previously taken place within a 0.5-mile radius of the Project Site. No previous studies have taken place and no resources have been recorded within the Project Site.

A Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC) resulted in positive findings within the vicinity of the Project area, and the NAHC

recommended further consultation with the Gabrieleño/Tongva San Gabriel Band of Mission Indians in accordance with Assembly Bill (AB) 52. The City received a response from the Gabrieleño Band of Mission Indians - Kizh Nation Tribe on July 13, 2024, indicating they had an interest in the Project at the time. A tribal consultation call was scheduled between the City and the Gabrieleño Band of Mission Indians - Kizh Nation Tribe on August 16, 2024. During the call after learning that the Project would involve no ground disturbance, the Gabrieleño Band of Mission Indians - Kizh Nation Tribe expressed no concerns with the Project. The Gabrieleño Band of Mission Indians - Kizh Nation Tribe requested that the City reach out to the Tribe for further assessment should there be a change to the Project. AB 52 and SB 18 consultation with the Gabrieleño Band of Mission Indians - Kizh Nation Tribe was concluded afterwards. The City also received a response from the Gabrielino Tongva Indians of California Tribal Council on July 24, 2024, indicating interest in the Project at the time. However, after City staff confirmed via email that the Project would involve no ground disturbance, the Gabrielino Tongva Indians of California Tribal Council expressed no concerns with the Project via email on July 24, 2024, and AB 52 and SB 18 tribal consultation efforts with the Gabrielino Tongva Indians of California Tribal Council concluded afterwards. To date, no other responses from the Native American community have been received as part of the AB 52 and SB 18 tribal consultation effort.

A review of available geologic maps, topographic maps, and historic aerial imagery was conducted for the Project Site. Geologic maps show that the Project Site is underlain by younger Quaternary alluvium (Qya). Human occupation took place in the more recent Holocene era and, as such, younger geologic units such as those within the Project Site typically have a moderate-to-high potential for archaeological resources at surface or near surface level. However, historic aerials and topographic maps show that development within the Project Site, and therefore, ground disturbance, occurred prior to earliest imagery on file from 1947. Additionally, the Project Site looks to have been redeveloped at least once, and currently contains a below-ground garage that expands two levels. As a result of this review, it is apparent that the Project Site has been subjected to an extensive amount of ground disturbance, including at least 40 to 50 feet below surface to accommodate a subterranean two-story parking garage.

Since no archaeological resources were identified within the Project Site as a result of the records search and associated research, it is unlikely that undisturbed archaeological resources are present within the Project Site given the extent of prior development. Additionally, the Project would involve only minimal ground-disturbing activities within the existing utility right-of-way adjacent to the Project Site for connection to utility infrastructure, and would not involve excavation or grading. As such, there is little potential for archaeological resources that meet the definition of “Historical Resources” or “Unique Archaeological Resources”, as defined by CEQA, to be identified within the Project area as a result of the Archaeological Resources Assessment.

Regarding the associated ZTA and GPA, the ZTA and GPA would only affect development within the Business Triangle, which also has been heavily disturbed and is entirely developed with commercial and office uses. Additionally, given that other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would similarly involve the conversion of the ground level of an existing parking structure abutting a public street to retail businesses, such would similarly involve minimal ground-disturbing activities. Nevertheless, such projects are subject to

applicable regulations formulated to avoid significant archaeological resource impacts. In addition, as applicable, such projects would be required to conduct site-specific SLF or records searches with the SCCIC to determine if any applicable results would affect the related projects. Additionally, such other potential development projects would be subject to the same CEQA requirements as the Project and potential impacts to archaeological resources would be evaluated as part of those projects' environmental analysis. As such, the adoption of the associated ZTA and GPA would have a less than significant impact on archaeological resources.

Therefore, impacts to archaeological resources would be less than significant.

4.5c Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Given the Project Site has been subject to extensive disruption, the potential to disturb or impact any human remains is unlikely. Additionally, the Project would involve only minimal ground-disturbing activities within the existing utility right-of-way adjacent to the Project Site for connection to utility infrastructure and would not involve excavation or grading. However, there is always a possibility that that human remains could be interred beneath the Project Site. If human remains are found, the Project would be required to comply with PRC Section 5097, et seq., and California State Health and Safety Code (HSC) Sections 7050.5-7055 that describe the general provisions regarding human remains, including the requirements if any human remains are accidentally discovered during excavation of a site. The requirements and procedures set forth in PRC Section 5097.98 would be implemented if human remains are discovered, including notification of the County Coroner, notification of the NAHC if the remains are determined to be prehistoric, and consultation with the individual identified by the NAHC to be the "most likely descendant." If human remains are found during excavation, the Project will comply with California State HSC Section 7050.5 in which excavation must stop within 50 feet of the discovery until the County Coroner has made a determination of origin and disposition of the remains pursuant to PRC Section 5097.98 and appropriate recommendations have been made for the treatment and disposition of the remains. Similarly, other potential development within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be subject to the same regulations regarding the inadvertent discovery of human remains. Compliance with the established regulatory framework would ensure the proper treatment of human remains should they be encountered. Therefore, impacts would be less than significant.

4.6 Energy

This Section is based on the *Energy Calculations* prepared by Kimley-Horn, which are included in their entirety in **Appendix D: Energy Calculations**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Impact Analysis

4.6a Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Southern California Edison (SCE) provides electricity to the Project area. Total electricity demand in SCE's service area is forecast to increase by approximately 8,000 GWh—or 8 billion kWh—between 2024 and 2030.[12]

Construction

The energy consumption associated with Project construction includes primarily diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption. Temporary electric power for as-necessary lighting and electronic equipment (such as computers inside temporary construction trailers, and heating, ventilation, and air conditioning) would be connected to existing power options. The amount of electricity used during construction would be minimal; typical demand would stem from the use of electrically powered hand tools and several construction trailers by managerial staff during the hours of construction activities. The majority of the energy used during construction would be from petroleum (e.g., gasoline and diesel).

Construction activity is anticipated to occur over a duration of approximately 14 months, beginning as early as January 2025 and ending as early as February 2026. The energy associated

[12] California Energy Commission, California Energy Demand 2018-2030 Revised Forecast, Figure 49 Historical and Projected Baseline Consumption SCE Planning Area, 2018, https://www.enreergy.ca.gov/data-reports/reports/integrated-energy-policy-report/2017-integrated-energy-policy-report/2017-iepr. Accessed July 25, 2024.

with Project construction includes diesel fuel from on-road hauling trips, vendor trips, and off-road construction diesel equipment, as well as gasoline fuel from on-road worker commute trips. Because construction activities typically do not require natural gas, it is not included in the following discussion. The methodology for each category is discussed below. Quantifications of construction energy are provided by the Project below; see **Table 4.6-1: Energy Use During Construction.**

Table 4.6-1: Energy Use During Construction

Source	Project Construction Usage[1]	Los Angeles County Annual Energy Consumption	Percentage of Countywide Consumption
Diesel Use	**Gallons**		
On-Road Construction Trips	475	532,570,627	0.00009%
Off-Road Construction Equipment	16,252		0.00305%
Construction Diesel Total	16,727		0.00314%
Gasoline	**Gallons**		
On-Road Construction Trips	552	3,536,229,368	0.00002%

1. Fuel usage based on Climate Registry conversion ratios (General Reporting Protocol, 2022).
Source: Refer to the energy calculations in **Appendix E**.

Fuel

During Project construction, transportation energy use would depend on the type and number of trips, vehicle miles traveled (VMT), fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would be from transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel/gasoline. The use of energy resources by these vehicles would fluctuate according to the construction phase and would be temporary. Project construction would total approximately 16,727 gallons of diesel and 552 gallons of gasoline. As shown above in Table 4.6-1, the proposed Project's fuel from the entire construction period would approximately 0.00314 percent of Countywide diesel and 0.00002 percent of Countywide gasoline consumption.

Impacts related to transportation energy use during Project construction would be temporary and would not require expanded energy supplies or construction of new infrastructure. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary fuel consumption.

Operations

The energy consumption associated with Project operations would occur from building energy (electricity) use, water use, and transportation-related fuel use. Annual Energy use during Project operation is shown in **Table 4.6-2: Annual Energy Consumption During Operations**.

Table 4.6-2: Annual Energy Consumption During Operations

Source	Project Operational Usage	Los Angeles County Annual Energy Consumption	Percentage Increase Countywide

Electricity Use	**GWh**		
Building Energy[1]	0.068	68,485	0.00010%
Water Conveyance	0.003		0.00001%
Natural Gas Use	**Therms/Year (therms/year)**		
Area	335	2,820,285,935	0.00001%
Diesel Use	**Gallons/Year**		
Mobile[2]	3,910	535,038,344	0.00073%
Gasoline Use	**Gallons/Year**		
Mobile[2]	39,728	3,446,400,365	0.00115%

1. The electricity and natural gas usage are based on Project-specific estimates and CalEEMod defaults.
2. Calculated based on the mobile source fuel use based on VMT and fleet-average fuel consumption (in gallons per mile) from EMFAC2021 for operational year 2026.

Source: Refer to the energy calculations in **Appendix E**.

Electricity

The Project's estimated operational electrical demand would total approximately 0.071 GWh per year. This would represent 0.0001 percent of SCE's forecast 2026 increased demand, thus, would result in a negligible increased demand compared to SCE's overall demand. It is also noted that the Project (i.e., design and materials) would be subject to compliance with the 2022 Building Energy Efficiency Standards. The Project would also be required to comply with CALGreen, which establishes planning and design standards for sustainable site development, energy efficiency (more than California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Due to energy efficiency measures incorporated into the facility, Project operations would not result in wasteful, inefficient, or unnecessary consumption of energy, or wasteful uses of electricity resources.

Natural Gas

Southern California Gas Company (SoCalGas) provides natural gas to the Project area. The Project's estimated operational natural gas demand would total approximately 335 therms per year. This would represent 0.00001 percent of SoCalGas's forecast 2026 increased demand, thus would result in a negligible increased demand compared to SoCalGas's overall demand. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary consumption of natural gas resources.

Fuel

As shown in Table 4.6-2, during Project operations, diesel fuel consumption would be approximately 3,910 gallons per year. The Project would generate 370 net daily vehicle trips. As shown above in Table 4.6-2, the County's annual diesel fuel use in 2026 is anticipated to be 535,038,344 gallons.[13] Estimated Project operational diesel fuel use would represent 0.001 percent of the County's current diesel use. Thus, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Estimated Project operational gasoline fuel use would be approximately 39,728 gallons per year, which represent 0.001 percent of the County's current gasoline use. Thus, the proposed Project would not result in a substantial demand for

[13] California Air Resources Board, EMFAC2021.

energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary fuel consumption. In addition, this analysis includes a conservative estimate of fuel usage.

None of the projected energy uses exceed one percent of the corresponding County use. Project operations would not substantially affect existing energy or fuel supplies or resources. Further, the Project would be subject to compliance with applicable energy standards and new capacity would not be required.

Proposed ZTA and GPA Energy Impacts

Regarding the associated ZTA and GPA for the Project, given that the nature of other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be similar in nature and scale to the proposed development for this Project in that they would also involve the conversion of the ground floor of an existing parking structure to retail businesses, construction and operational energy consumption of the other potential development projects would likely be similar to that for this Project. As with the Project, these other potential development projects would also be required to comply with relevant CALGreen regulations and standards, further reducing energy consumption. Should any potentially significant energy impacts occur, these projects, should they become reasonably foreseeable, would be required to complete a project-specific CEQA analysis at that time and mitigate such impacts to a less than significant level, where applicable. As such, energy consumption impacts from adoption of the associated ZTA and GPA would be less than significant.

Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would result in a less than significant impact concerning consumption of energy resources.

4.6b Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Project design and operations would be subject to compliance with State Building Energy Efficiency Standards, appliance efficiency regulations, and CALGreen Code standards. As concluded in Threshold 4.6a, Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Although the City has not adopted any specific plans that address energy efficiency, the City has released the Draft Beverly Hills Climate Action and Adaptation Plan (CAAP) in March 2023 to help the City comply with the City's GHG emissions reduction goals through implementation of many measures that also result in energy conservation and efficiency. As such, the Project would be designed to meet all applicable State building energy efficiency standards as well as the City's energy efficiency

standards. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which would also be subject to compliance with pertinent specific plans that address energy efficiency, and the City's energy efficiency standards. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

4.7 Geology and Soils

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Impact Analysis

4.7ai Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as Alquist-Priolo Earthquake Fault Zones, around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

According to the California Geological Survey (CGS), the Project Site is within the Santa Monica Fault Zone, which is an Alquist-Priolo Earthquake Fault Zone in the Beverly Hills Quadrangle.[14] Additionally, Cross Fault #2, an inferred fault, passes through the Project Site. According to the California Geological Survey (CGS), Cross Fault #2, an inferred fault, passes through the Project Site.[15] However, the corresponding Fault Evaluation Report from CGS states that this fault became inactive about 200,000 years ago.[16] Therefore, the likelihood of surface rupture occurring due to seismic activity from Cross Fault #2 is low. Nevertheless, as the Project Site is within the Santa Monica Fault Zone, which is an Alquist-Priolo Earthquake Fault Zone, the potential for surface rupture at the Project Site due to seismic activity from the Santa Monica Fault Zone is high, and the Project could cause potential substantial adverse effects involving rupture of a known earthquake fault. In accordance with the 2022 California Building Code (CBC) and City Building Code, the Project would involve seismic retrofitting of the parking garage to accommodate seismic loading. Similarly, regarding the ZTA and GPA, although there are potentially active faults located within the Business Triangle, development within the Business Triangle would also be subject to regulations from the CBC and City Building Code. Through compliance with existing pertinent regulations, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not result in substantial damage to structures or infrastructure or expose people to substantial risk of injury involving the rupture of a known earthquake fault. Impacts from fault rupture would be less than significant.

[14] California Geological Survey (CGS), Earthquake Zones of Required Investigation Beverly Hills Quadrangle, 2018.
[15] CGS, Plate 1 – FER 259, 2018.
[16] CGS, Fault Evaluation Report FER 259, 2018, page 17.

4.7aii Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving strong seismic ground shaking?

Less Than Significant Impact. The Project Site is within the Southern California region, a seismically active area. As described in Threshold 4.7ai, although Cross Fault #2 cross through the Project Site, the fault became inactive about 200,000 years ago; therefore, the likelihood of seismic activity occurring from this fault is low. However, the Project Site is within the Santa Monica Fault Zone, a designated Alquist-Priolo Earthquake Fault Zone in the Beverly Hills Quadrangle. Additionally, several other active and potentially active faults are mapped within 10 kilometers of the Project Site, most notably the Newport-Inglewood, Santa Monica, and Hollywood Fault Zones.[17] Thus, the Project Site is exposed to potential risk involving strong seismic ground shaking. Accordingly, the Project would be subject to compliance with the most recent versions of the CBC and City Building Code, which are intended to minimize potential risk involving seismic ground shaking. Similarly, regarding the ZTA and GPA, although there are potentially active faults located within the Business Triangle, development within the Business Triangle would also be subject to regulations from the CBC and City Building Code. Therefore, following compliance with the established regulatory framework, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not cause potential substantial adverse effects involving strong seismic ground shaking. Impacts would be less than significant.

4.7aiii Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving seismic-related ground failure, including liquefaction?

No Impact. Liquefaction is a seismic phenomenon in which loose, saturated, relatively uniform fine- to medium-grained clean cohesionless soils behave similarly to a fluid when subjected to high-intensity and long-duration ground shaking. Three criteria must be met for liquefaction to occur: 1) loose, clean granular soils, 2) shallow groundwater, and 3) strong, long-duration ground shaking.

The Project Site is currently developed with an existing parking garage with two subterranean levels and three above-grade levels (including rooftop parking) and an office building. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses.

Construction of the Project would be contained entirely within the ground floor of the parking garage and would not encroach on other levels of the structure; accordingly, the Project is not anticipated to involve any soil-disturbing or dewatering activities. Additionally, the CGS' Earthquake Zones of Required Investigation for the Beverly Hills Quadrangle Map indicates that the Project Site is not within an area potentially susceptible to liquefaction.[18] Similarly, the associated ZTA and GPA would not cause potential substantial adverse effects involving seismic-related ground failure, as the Business Triangle is not located within an area potentially susceptible to liquefaction. Therefore, the Project, including the adoption of the associated ZTA

[17] CGS, Alquist-Priolo Site Investigation Reports, https://maps.conservation.ca.gov/cgs/informationwarehouse/apreports/. Accessed June 14, 2024.
[18] CGS, Earthquake Zones of Required Investigation Beverly Hills Quadrangle.

and GPA for the Business Triangle, would not cause potential adverse effects involving seismic-related ground failure, including liquefaction. No impacts would occur.

4.7aiv Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving landslides?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. The topography of the Project Site and surrounding area are flat. No landslides are located on or near the Project Site. Additionally, according to the CGS' Earthquake Zones of Required Investigation for the Beverly Hills Quadrangle Map, the Project Site is not within an earthquake-induced landslide zone.[19] Therefore, the potential for seismically-induced landslides to impact the Project Site is very low. Similarly, regarding the associated ZTA and GPA, as the area encompassing the Business Triangle is relatively flat, the likelihood for seismically-induced landslides to impact the Business Triangle is also very low. As such, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, or death involving landslides. No impacts would occur.

4.7b Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project Site is located in an urbanized area, has been previously disturbed by past development activities, and is currently completely developed with an existing five-level parking garage consisting of two subterranean levels and three above-grade levels (including rooftop parking) and office building. The Project involves the conversion of a portion of the ground floor of the parking garage to retail space and associated hardscape improvements, including the addition of approximately 300 square feet of planter area.

The Project would not involve any excavation or grading. The Project would include minor ground-disturbing activities within the existing utility right-of-way adjacent to the Project Site to allow for connection to existing utility infrastructure adjacent to the Project Site. During this work, soil would be exposed. The Applicant would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the Project Site. Additionally, the Applicant would be required to comply with CALGreen Building Code Section 5.106.1, which states that newly constructed projects and additions which disturb less than one acre of land shall prevent the pollution of stormwater runoff from the construction activities through the implementation of the local stormwater management and/or erosion control ordinance and best management practices (BMPs). Additionally, the associated ZTA and GPA would only affect development within the Business Triangle. Development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would similarly convert the ground level of a parking structure to retail business and may not involve excavation or grading as the work would be confined to the ground level of existing parking structures that may involve soil movement, which would be required to comply with the same regulations pertaining to the minimization of soil erosion or the loss of

[19] CGS, Earthquake Zones of Required Investigation Beverly Hills Quadrangle.

topsoil. Therefore, through compliance with existing regulations, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not result in substantial erosion or the loss of topsoil. Therefore, impacts would be less than significant.

4.7c 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?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project Site would not be subject to seismically-induced liquefaction (see Threshold 4.7a.iii) or landslides (see Threshold 4.7a.iv).

For lateral spreading to occur, the liquefiable zone must be continuous, unconstrained laterally, and free to move along gently sloping ground toward an unconfined area. Since liquefaction is not considered a hazard at the Project Site (see Threshold 4.7a.iii), earthquake-induced lateral spreading is also not considered a hazard at the Project Site. Given that other potential development projects within the Business Triangle that may take advantage of the associated ZTA and GPA would similarly convert the ground level of an existing parking structure abutting a public street to retail businesses, such projects would likely not be susceptible to liquefaction. Additionally, lateral spreading is also not considered a hazard within the Business Triangle. Therefore, there would be no impacts associated with lateral spreading.

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface, which can result in a gradual lowering of the ground level. The Project Site is not mapped in an area of subsidence by the U.S. Geological Survey (USGS).[20] Furthermore, as construction of the Project would be contained entirely within the ground floor of the parking garage and would not encroach on other levels of the structure or require excavation or grading, the Project would not involve any dewatering activities that could cause ground subsidence on the Project Site. Additionally, the ZTA and GPA associated with the Project would only affect similar development within the Business Triangle, which is also not in an area of subsidence mapped by USGS. Additionally, as with the Project, similar development projects within the Business Triangle would also be contained within the ground levels of existing parking garages and would likely not require construction activities that could cause ground subsidence on their sites. Therefore, the potential for ground collapse and other adverse effects due to subsidence to occur on the Project Site is considered low, and there would be no impact.

Regarding collapsible soils, construction of the Project would be contained entirely within the ground floor of the parking garage and would not encroach on other levels of the structure. Accordingly, the Project would not involve any soil movement. Development projects within the Business Triangle that may take advantage of the ZTA and GPA, , for purposes of converting existing street level parking into retail use and should they meet the criteria, and that may involve soil movement would be required to comply with CBC and City Building Code regulations to minimize risk pertaining to collapsible soils. Therefore, the Project's potential for collapse is considered low, and there would be no impact.

[20] United States Geological Survey, Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed June 26, 2024.

For the reasons substantiated above, Project development, including the adoption of the associated ZTA and GPA for the Business Triangle, would not cause substantial hazards arising from unstable soils. There would be no impact.

4.7d Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?

No Impact. The Project Site is currently developed with an existing parking garage with two subterranean levels and three above-grade levels (including rooftop parking) and ten-story office building. The Project involves the conversion of a portion of the ground floor of the parking garage to retail space.

The Project would not involve any excavation or grading and would only include minor ground-disturbing activities within the existing utility right-of-way adjacent to the Project Site to allow for connection to existing utility infrastructure adjacent to the Project Site. Accordingly, the Project would not involve substantial soil movement that would create substantial risk involving expansive soils. Additionally, the associated ZTA and GPA would only affect development within the Business Triangle. Development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be similar in nature and scale to the Project and may not involve excavation or grading as the work would be confined to the ground level of existing parking structures. Projects that may involve soil movement would be required to comply with CBC and City Building Code regulations to minimize risk pertaining to expansive soils. Therefore, no impacts would occur.

4.7e Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The Project would construct sewer laterals that would connect to existing sewer lines in surrounding roadways. The Project does not propose to use septic tanks or alternative wastewater disposal systems. Temporary sanitary systems would be brought in during construction and removed when the Project becomes operational. The Project would be directly connected to existing sewer lines upon operation. Additionally, the ZTA and GPA would only affect development within the Business Triangle, which is comprised of commercial and office uses and does not include or would likely propose the use of septic tanks or alternative wastewater disposal systems. Development within the Business Triangle would also be connected to existing sewer lines. Therefore, there would be no impact.

4.7f Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These resources are valued for the information they yield about the earth's history and its past ecological settings. The potential for fossil occurrence depends on the rock type exposed at the surface in a given area.

The Project Site is in an urbanized area, has been previously disturbed by past development activities, and is currently completely developed with an existing five-level parking garage

consisting of two subterranean levels and three above-grade levels (including rooftop parking) and an office building. The Project involves the conversion of a portion of the ground floor of the parking garage to retail space. The Project would not involve any excavation or grading and would only include minor ground-disturbing activities within the existing utility right-of-way adjacent to the Project Site to allow for connection to existing utility infrastructure adjacent to the Project Site. As the soils within the utility right-of-way have been previously disturbed, the likelihood for paleontological resources to exist is low. There are no unique geologic features on-site. Additionally, the associated ZTA and GPA would only affect development within the Business Triangle, which is also heavily disturbed and completely developed with commercial and office uses and is therefore unlikely to contain paleontological resources. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not destroy a unique paleontological resource or site or unique geologic feature. There would be no impact.

4.8 Greenhouse Gas Emissions

This Section is based on the Greenhouse Gas Emissions Assessment prepared by Kimley-Horn, which is included in its entirety in **Appendix E: Greenhouse Gas Emissions Assessment**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Greenhouse Gas Emissions Methodology

Addressing greenhouse gas (GHG) emissions generation impacts requires an agency to determine what constitutes a significant impact. Amendments to the CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions will have a "significant" impact on the environment. Pursuant to CEQA Guidelines Section 15064.4(a), agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions.

On September 28, 2010, air quality experts serving on the SCAQMD GHG CEQA Significance Threshold Stakeholder Working Group recommended an interim screening level numeric bright-line threshold of 3,000 $MTCO_2e$ annually. The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, various city and county planning departments. The numeric bright line and efficiency-based thresholds, which were developed for consistency with CEQA requirements for developing significance thresholds, are supported by substantial evidence and provide guidance to CEQA practitioners and lead agencies for determining whether GHG emissions from a proposed project are significant. Therefore, this analysis relies on SCAQMD's recommended Tier 3 screening thresholds to determine the significance of a project's GHG emissions. To provide the most conservative analysis, the City will apply the 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year screening threshold recommended by SCAQMD for residential and commercial projects.

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model version 2022.1 (CalEEMod). Details of the modeling assumptions and emission factors are provided in Appendix E. For construction, CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and

construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and applying the mobile-source and fugitive dust emissions factors derived from CalEEMod. The Project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles.

The Project's operational GHG emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance, consumer products), electrical generation, natural gas consumption, water supply and wastewater treatment, and solid waste. These emissions categories are discussed below.

- Area Sources. Area source emissions occur from architectural coatings, landscaping equipment, and consumer products. Additionally, the primary emissions from architectural coatings are volatile organic compounds, which are relatively insignificant as direct GHG emissions.
- Energy Consumption. Energy consumption consists of emissions from project consumption of electricity and natural gas. Primary uses of electricity and natural gas by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. Energy emissions are calculated based on consumption rates and emissions factors in CalEEMod. No changes were made to the default energy usage consumption rates or emissions factors.
- Solid Waste. Solid waste releases GHG emissions in the form of methane when these materials decompose. Solid waste emissions are calculated based on generation rates and emissions factors in CalEEMod.
- Water and Wastewater. Project GHG emissions would be generated from energy consumption associated with water and wastewater conveyance and treatment. Water and wastewater emissions are calculated based on the estimated consumption and emissions factors in CalEEMod.
- Mobile Sources. Mobile sources are emissions from motor vehicles. Project trip generation is based on the following 11th Edition Institute of Transportation Engineers (ITE) land use categories:
    - ITE Land Use 822: Strip Retail Plaza (<40k) – 6,797 square feet, 370 total daily vehicle trips.

  The Project would generate 370 net daily trips. For this analysis, it was assumed the mobile source emission rates in CalEEMod used the CARB SAFE Rule adjustment factors.[21]

[21] The U.S. EPA repealed SAFE Rule Part 1 on January 28, 2022. Therefore, the mobile source emissions in this analysis are conservative.

Impact Analysis

4.8a Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Short-Term Construction Greenhouse Gas Emissions

The Project would result in direct emissions of carbon dioxide (CO_2), nitrogen dioxide (N_2O), and methane (CH_4) from construction equipment and the transport of materials and construction workers to and from the Project Site. The GHG emissions only occur during temporary construction activities and would be cease once construction is complete. The total GHG emissions (in $MTCO_2e$) generated during construction are shown in **Table 4.8-1: Construction-Related Greenhouse Gas Emissions**.

Table 4.8-1: Construction-Related Greenhouse Gas Emissions

Category	$MTCO_2e$
Construction Year 1 (2025)	159.6
Construction Year 1 (2026)	15.07
Total Construction Emissions	174.7
30-Year Amortized Construction Emissions	**5.82**

Source: CalEEMod version 2022.1; see **Appendix E** for model outputs.

As shown in Table 4.8-1, the Project would result in the generation of approximately 174.7 $MTCO_2e$ over the course of construction. Construction GHG emissions are typically summed and amortized over a 30-year period and then added to the operational emissions. The amortized Project construction emissions would be 5.82 $MTCO_2e$ per year. Once construction is complete, the generation of these GHG emissions would cease.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, onsite combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators. Prior to issuance of a building permit, the City would review and verify that the Project plans demonstrate compliance with the current version of the Building and Energy Efficiency Standards. The Project would also be required to adhere to the provisions of the CALGreen Code, which establishes planning and design standards for sustainable site development, and energy efficiency. Construction activities would be required to monitor air quality emissions using applicable regulatory guidance such as the SCAQMD Rules.

The Project's operational GHG emissions are summarized in **Table 4.8-2: Operational Greenhouse Gas Emissions**. As shown in Table 4.8-2, the Project's unmitigated emissions would be approximately 344.93 $MTCO_2e$ annually from both construction and operations. Project-related GHG emissions would not exceed the City's 3,000 $MTCO_2e$ per year threshold. The majority of the GHG emissions (over 90 percent) are associated with non-construction related mobile sources. Emissions of motor vehicles are controlled by State and federal standards, and the Project has no control over these standards. Therefore, the Project would not generate GHG emissions that could have a significant impact on the environment.

Table 4.8-2: Operational Greenhouse Gas Emissions

Emissions Source	$MTCO_2e$ Emissions Per Year
Construction Amortized Over 30 Years	5.82
Area Source	0.14
Energy	12.47
Mobile	323.04
Waste	2.23
Water	1.23
0.01	0.01
TOTAL	344.93
Threshold	*3,000*
Exceeds Threshold?	**No**

Source: CalEEMod version 2022.1; see **Appendix E** for model outputs.

Proposed ZTA and GPA GHG Emission Impacts

Regarding the associated ZTA and GPA for the Project, given that the nature of other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be similar in nature and scale to the proposed development for this Project in that they would also involve the conversion of the ground floor of an existing parking structure to retail businesses, construction and operational GHG emissions generated by the other potential development projects would be similar to that for this Project. As with the Project, these other potential development projects would also be required to comply with relevant State and SCAQMD regulations and standards pertaining to GHG emissions, and mitigate impacts to a less than significant level, where applicable. As such, GHG emission impacts from adoption of the associated ZTA and GPA would be less than significant.

For the reasons expounded above, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not directly or indirectly generate GHG emissions that would significantly impact the environment. Impacts would be less than significant.

4.8b Would the project conflict with applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Regional Transportation Plan/Sustainable Communities Strategy Consistency

On April 4, 2024, SCAG's Regional Council adopted Connect SoCal 2024 (2024 - 2050 RTP/SCS [2024 RTP/SCS]). This analysis also discusses the Project's consistency with the previously adopted Connect SoCal (2020 – 2045 RTP/SCS [2020 RTP/SCS]) which was adopted on September 3, 2020. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Under Senate Bill (SB) 375, SCAG's 2024 RTP/SCS establishes GHG emissions goals to reduce GHG emissions in the region by eight percent from 2005 levels by 2020 and by 2035. SCAG's 2020 RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

Since Connect SoCal was adopted in 2020, SCAG gained responsibility for the selection of transportation projects to be funded with federal revenue. The 2024 RTP/SCS invests $751.7 billion in our transportation system, primarily in operations and maintenance, to ensure the continued performance of our current network. The 2024 RTP/SCS would also add 181,200 new miles of transit revenue service, 4,000 new miles of bike lanes and 869 new miles to the Regional Express Lane Network. Strategic investments in infrastructure and transportation would improve access to employment centers and stimulate regional economic growth and opportunity in historically underserved areas. Connect SoCal is an important planning document for the region, allowing public agencies to implement transportation projects in a coordinated manner while qualifying for federal and state funding. Connect SoCal also supports local jurisdictions in making informed land use planning and housing development decisions.

The 2024 and 2020 RTP/SCS plans account for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. The 2024 and 2020 RTP/SCS are also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and FCAA requirements, increased housing production, improved equity and resilience, the preservation of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources. GHG emissions resulting from development-related mobile sources are the most potent source of emissions; therefore, the Project's comparison to the 2024 and 2020 RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG

reduction goals promulgated by the State. The Project's consistency with the 2024 and 2020 RTP/SCS goals is analyzed in detail in **Table 4.8-3: Regional Transportation Plan/Sustainable Communities Strategy Consistency**.

Table 4.8-3: Regional Transportation Plan/Sustainable Communities Strategy Consistency

SCAG Goals	Consistency
2024 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY CONSISTENCY	
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions	**Not Applicable**. This is not a project-specific policy and is therefore not applicable.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities	**Not Applicable**. This is not a project-specific policy and is therefore not applicable.
Support planning for people of all ages, abilities, and backgrounds	**Not Applicable**. This is not a project-specific policy and is therefore not applicable.
Communities: Develop, connect, and sustain communities that are livable and thriving	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances	**No Conflict**. The Project is located in an urban area in proximity to existing community services. Additionally, the Project is located near existing transit routes and access to State Route 2 [SR-2]).
Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households	**Not Applicable**. The Project does not propose residential uses.
Environment: Create a healthy region for the people of today and tomorrow	
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change	**No Conflict.** As discussed above, the Project would not exceed the City's GHG emission threshold, and therefore would not result in significant GHG impacts.
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water	**No Conflict.** While the Project is not a transportation improvement Project, location of the Project within a developed area would reduce trip lengths, which would reduce GHG emissions. Additionally, the reduction of energy use and promotion of more environmentally sustainable development are encouraged through the development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques such as compliance with the provisions of the California

Table 4.8-3: Regional Transportation Plan/Sustainable Communities Strategy Consistency	
SCAG Goals	**Consistency**
	Building Energy Efficiency Standards and CALGreen.
Conserve the region's resources	**No Conflict.** The Project is located on land that is not designated for agricultural uses, natural resources, or conservation. Therefore, Project development would not result in a loss of the region's resources.
Economy: Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region	
Improve access to jobs and educational resources	**No Conflict.** The Project proposes a retail development within an urban area, in close proximity to residential uses. Therefore, the location of the Project would improve access to employment opportunities.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities	**No Conflict.** The Project includes retail uses that would support goods movement.
2020 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY CONSISTENCY	
GOAL 1: Encourage regional economic prosperity and global competitiveness.	**Not Applicable:** This is not a project-specific goal. Notwithstanding, the Project is of retail usage, which would further promote regional economic activity and commercial competition.
GOAL 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No Conflict.** Although this Project is not a transportation improvement project, the Project is located near existing transit routes on SR-2 to the north, Metro Line 20 bus stop to the southwest, Metro Line 4 bust stop to the northeast, and Metro Line 720 bus stop to the southwest. The Project is also northwest of the future Metro D Line Wilshire/Rodeo Station.
GOAL 3: Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable:** The Project is not a transportation improvement project.
GOAL 4: Increase person and goods movement and travel choices within the transportation system.	**Not Applicable:** The Project is not a transportation improvement project.
GOAL 5: Reduce greenhouse gas emissions and improve air quality.	**No Conflict.** The Project Site is in an urban area near existing public transit routes and freeways. The Project's location within an urbanized area

Table 4.8-3: Regional Transportation Plan/Sustainable Communities Strategy Consistency		
SCAG Goals		**Consistency**
		would reduce trip lengths, which would reduce GHG and emissions.
GOAL 6:	Support healthy and equitable communities.	**No Conflict.** The Project does not exceed the City's GHG emission threshold. The Project would not violate any GHG standards, contribute substantially to an existing or projected GHG violation, or result in significant GHG impacts.
GOAL 7:	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Not Applicable:** This is not a project-specific goal.
GOAL 8:	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable:** This is not a project-specific goal.
GOAL 9:	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Not Applicable:** The Project is not a residential project.
GOAL 10:	Promote conservation of natural and agricultural lands and restoration of habitats.	**Not Applicable:** The Project Site is not located on agricultural lands and does not contain native habitat.

2017 California Air Resource Board Scoping Plan Consistency

Pursuant to the requirements in AB 32, CARB adopted the Climate Change Scoping Plan (Scoping Plan) in 2008, which provides a range of GHG reduction actions. The 2017 Scoping Plan Update identifies additional GHG reduction measures necessary to achieve the 2030 target of a 40 percent reduction below 1990 levels. These measures build upon those identified in the first update to the Scoping Plan in 2013. The Project's consistency with the CARB Scoping Plan, and implementing regulatory programs, is analyzed in detail in **Table 4.8-4: Project Consistency with Applicable CARB Scoping Plan Measures**. As indicated in Table 4.8-4, the Project would comply with the applicable measures. As such, impacts related to consistency with the Scoping Plan would be less than significant, and no mitigation is required.

Table 4.8-4: Project Consistency with Applicable CARB Scoping Plan Measures			
Scoping Plan Sector	**Scoping Plan Measure**	**Implementing Regulations**	**Project Consistency**
Transportation	California Cap-and-Trade Program Linked to Western Climate Initiative	Regulation for the California Cap on GHG Emissions and Market-Based	**No Conflict.** The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers. However, the regulation indirectly affects people who use the

Table 4.8-4: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
		Compliance Mechanism October 20, 2015 (CCR 95800)	products and services produced by these industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, generated in-State or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. The proposed Project would not conflict with implementation of the Cap-and-Trade Program and would indirectly be consistent with regard to the use of electricity and fuel.
	California Light-Duty Vehicle GHG Standards	Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles	**No Conflict.** This measure applies to all new vehicles starting with model year 2012. The Project would not conflict with its implementation as it would apply to all new passenger vehicles purchased in California. Passenger vehicles, model year 2012 and later, associated with Project construction and operation would be required to comply with the Pavley emissions standards.
		2012 LEV III California GHG and Criteria Pollutant Exhaust and Evaporative Emission Standards	**No Conflict.** The LEV III amendments provide reductions from new vehicles sold in California between 2017 and 2025. Passenger vehicles associated with Project construction and operations would be required to comply with LEV III standards.
	Low Carbon Fuel Standard	2009 readopted in 2015. Regulations to	**No Conflict.** This measure applies to transportation fuels utilized by vehicles in California. The Project would not conflict

Table 4.8-4: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
		Achieve GHG Emission Reductions Subarticle 7. Low Carbon Fuel Standard CCR 95480	with implementation of this measure. It is assumed that any motor vehicles associated with Project construction and operations would be consistent with the measure and utilize low carbon transportation fuels.
	Regional Transportation-Related GHG Targets.	SB 375. Cal. Public Resources Code §§ 21155, 21155.1, 21155.2, 21159.28	**No Conflict.** The Project would provide development in the region that is consistent with the growth projections in the 2020 RTP/SCS. The Project does not propose any dwelling units which would increase population . The Project would result in additional employment opportunities and foot traffic in the area. However, the Project is a retail project that is near major freeways and other services. By facilitating a development near existing public transit options and reducing single-passenger vehicle parking available on the Project Site, the Project would also reduce mobile-source GHG emissions. The Project would generate 370 net daily trips and public transit will be locally accessible.
	Goods Movement	Goods Movement Action Plan January 2007	**Not Applicable**. The Project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation.
	Medium/Heavy-Duty Vehicle	2010 Amendments to the Truck and Bus Regulation, the Drayage Truck Regulation and the Tractor-Trailer GHG Regulation	**No Conflict.** This measure applies to medium- and heavy-duty vehicles that operate in the State. The Project would not conflict with implementation of this measure. Medium- and heavy-duty vehicles associated with Project construction would be required to comply with this regulation.
	High Speed Rail	Funded under SB 862	**Not Applicable**. This is a Statewide measure that cannot be implemented by a project applicant or Lead Agency.

Table 4.8-4: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
Electricity and Natural Gas	Energy Efficiency	Title 20 Appliance Efficiency Regulation	**No Conflict.** The Project would not conflict with implementation of this measure, as it would be subject to compliance with the latest energy efficiency standards.
		Title 24 Part 6 Energy Efficiency Standards for Residential and Non-Residential Building	
		Title 24 Part 11 California Green Building Code Standards	
	Renewable Portfolio Standard/Renewable Electricity Standard.	2010 Regulation to Implement the Renewable Electricity Standard (33% 2020)	**No Conflict.** The Project would obtain electricity from the electric utility, Southern California Edison (SCE). SCE obtained 30.9 percent of its power supply from renewable sources in 2020 and include 50 percent and 100 percent renewable Green Rate options. Therefore, the utility would provide power to the Project that would be is comprised of a greater percentage of renewable sources.
	Million Solar Roofs Program	SB 350 Clean Energy and Pollution Reduction Act of 2015 (50% 2030)	
	Million Solar Roofs Program	Tax Incentive Program	**No Conflict.** This measure is to increase solar use throughout California, which is being done by various electricity providers and existing solar programs. The program provides incentives that are in place at the time of construction.
Water	Water	Title 24 Part 11 California Green Building Code Standards	**No Conflict.** The Project would comply with the CALGreen Code, which require a 20 percent reduction in indoor water use.
		SBX 7-7—The Water Conservation Act of 2009	
		Model Water	

Table 4.8-4: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
		Efficient Landscape Ordinance	
Green Buildings	Green Building Strategy	Title 24 Part 11 California Green Building Code Standards	**No Conflict.** The State is required to increase use of green building practices. The Project would implement required green building strategies through existing regulations that require the Project to comply with various CALGreen Code standards.
Industry	Industrial Emissions	2018 CARB Mandatory Reporting Regulation	**Not Applicable.** The Mandatory Reporting Regulation requires facilities and entities with more than 10,000 $MTCO_2e$ of combustion and process emissions, all facilities belonging to certain industries, and all electric power entities to submit an annual GHG emissions data report directly to CARB. As shown above, although total Project GHG emissions would not exceed 3,000 $MTCO_2e$, the Project is not considered a "facility" and the majority of these emissions are from mobile sources. Therefore, this regulation would not apply.
Recycling and Waste Management	Recycling and Waste	Title 24 Part 11 California Green Building Code Standards	**No Conflict.** The Project would not conflict with implementation of these measures. The Project is required to achieve the recycling mandates via compliance with the CALGreen Code.
		AB 341 Statewide 75 Percent Diversion Goal	
Forests	Sustainable Forests	Cap and Trade Offset Projects	**Not Applicable.** The Project is in an area designated for urban uses. No forested lands exist on the site.
High Global Warming Potential	High Global Warming Potential Gases	CARB Refrigerant Management Program CCR 95380	**No Conflict.** The regulations are applicable to refrigerants used by large air conditioning systems and large commercial and industrial refrigerators and cold storage systems. The Project would not conflict with the refrigerant management regulations adopted by CARB.
Agriculture	Agriculture	Cap and Trade	**Not Applicable**. No grazing, feedlot, or other

Table 4.8-4: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
		Offset Projects for Livestock and Rice Cultivation	agricultural activities that generate manure occur currently on site or are proposed by the Project.

Source: CARB, *California's 2017 Climate Change Scoping Plan*, November 2017 and CARB, *Climate Change Scoping Plan*, December 2008.

2022 California Air Resource Board Scoping Plan Consistency

CARB's 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential (GWP); providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines Section 15183.5.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy zero emission vehicle (ZEV) buses and trucks. Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

As indicated above, GHG reductions are also achieved as a result of State of California energy and water efficiency requirements for new residential developments. These efficiency improvements correspond to reductions in secondary GHG emissions. For example, in California, most of the electricity that powers homes is derived from natural gas combustion. Therefore, energy saving measures, such as Title 24, reduces GHG emissions from the power generation facilities by reducing load demand.

As discussed above and identified in Table 4.8-3 and Table 4.8-4, the Project would be consistent with all applicable plan goals and applicable regulatory programs designed to reduce GHG emissions generated by land use projects. The Project would be subject to compliance with all building codes in effect at the time of construction, which include energy conservation measures mandated by California Building Standards Code Title 24 – Energy Efficiency Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high-efficiency

lighting, high-efficiency HVAC systems, thermal insulation, double-glazed windows, water conserving plumbing fixtures), they indirectly regulate and reduce GHG emissions. California's Building Energy Efficiency Standards are updated on an approximately three-year cycle.

As shown in Table 4.8-2, approximately 97 percent of the Project's emissions are from energy and mobile sources, which would be further reduced by the 2022 Scoping Plan actions described above. The City has no control over vehicle emissions (approximately 96.7 percent of the Project's total emissions). However, these emissions would decline in the future due to Statewide measures, as well as cleaner technology and fleet turnover. The Project would not obstruct or interfere with efforts to increase ZEVs or State efforts to improve system efficiency. Compliance with applicable State standards (e.g., continuation of the Cap-and-Trade regulation; CARB's Mobile Source Strategy, Sustainable Freight Action Plan, and Advanced Clean Truck Regulation; Executive Order N-79-20; SB 100: renewable electricity portfolio improvements that require 60 percent renewable electricity by 2030 and 100 percent renewable by 2045, etc.) would ensure consistency with State and regional GHG reduction planning efforts, including the 2022 Scoping Plan. It is also noted that the Project would not convert any Natural and Working Lands (NWL) and/or decrease the State's urban forest carbon stock, which are areas of emphasis in the 2022 Scoping Plan. Further, the Project includes residential land uses that would potentially reduce the need to travel long distances for some residents and reducing associated GHG emissions.[22]

Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that Project operations would benefit from applicable measures enacted to meet State GHG reduction goals. The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. As such, impacts related to consistency with the 2022 Scoping Plan would be less than significant, and no mitigation is required.

Proposed ZTA and GPA GHG Emission Impacts

Regarding the associated ZTA and GPA for the Project, other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would also be required to comply with relevant regulations with the purpose of reducing GHG emissions in the 2024 RTP/SCS, 2017 Scoping Plan Update, and 2022 Scoping Plan. Given that the nature and scale of such projects would be similar to the proposed development for this Project in that they would also involve the conversion of the ground floor of an existing parking structure to retail businesses, these projects would also generally be consistent with pertinent regulations. Should a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions occur, these other development projects would also be required to mitigate potential impacts to a less than significant level, where applicable.

[22] California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010. The California Air Pollution Control Officers Association identifies that infill developments, such as the proposed Project reduce VMT which reduces fuel consumption. Infill projects such as the proposed Project would have an improved location efficiency.

In conclusion, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, does not conflict with the applicable plans and regulatory programs that are discussed above and therefore with respect to this particular threshold, impacts would be less than significant, and no measures would be required.

4.9 Hazards and Hazardous Materials

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
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?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

Impact Analysis

4.9a Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact.

Construction

The Project involves the demolition of building and pavement material of a portion of the ground floor of the existing parking garage on-site and the construction of retail spaces and landscaping as well as the relocation of three ADA parking spaces. Typical of many construction projects, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and

oils. Truck trips to deliver hazardous materials would reach the Project Site via designated truck routes such as SR-2, Santa Monica Boulevard, Roxbury Drive, Wilshire Boulevard, and possibly other local streets which connect the Project Site to nearby highways. All potentially hazardous materials used on the Project Site would be contained, stored, and used in accordance with manufacturer's instructions and handled in compliance with applicable standards and regulations, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, federal and State Occupational Safety and Health Acts (OSHA), SCAQMD rules, and permits and associated conditions issued by the City's Building and Safety Division. In accordance with federal and State law, the Project would be required to disclose hazardous materials handled at reportable amounts.

Additionally, due to the age of the existing parking garage that the Project Site is a part of (constructed in 1970), there is a potential that asbestos-containing materials (ACM) and lead-based paint (LBP) are present on-site. Therefore, in compliance with existing federal and State OSHA standards, comprehensive asbestos and lead surveys would be completed to determine the presence, condition, friability and likely future condition of suspect or confirmed ACM or LBP. All suspect materials would be handled as ACM and/or containing LBP according to local, State, and federal regulations until the results of sampling and analysis indicate the material is a non-ACM or does not contain LBP.

Similarly, regarding the ZTA and GPA associated with the Project, the construction of other development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would also be required to comply with the same regulations regarding the transport, use, or disposal of hazardous materials, and regulations regarding the testing for and removal of ACM and/or LBP.

Therefore, for the reasons substantiated above, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

Operation

Operation of the Project would involve the use and storage of small quantities of potentially hazardous materials in the form of common hazardous substances typical of those used in commercial developments, including paints, solvents, custodial products (e.g., cleaning supplies), pesticides and other landscaping supplies.

The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Moreover, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, State, and local requirements, such as the California Hazardous Waste Control Law, federal and State OSHA, the emergency Planning and Community Right-to-Know Act (Superfund Amendments and Reauthorization Act, Title III), and Safe Drinking Water and Toxic Enforcement Act, and Uniform Fire Code. Additionally, regarding the ZTA and GPA associated with the Project, the operation of similar development within the Business Triangle would also be required to comply with the same regulations regarding the transport, use, or disposal of hazardous materials. Therefore, with compliance with manufacturer's standards and all applicable federal,

State, and local laws and regulations relating to environmental protection and the management of hazardous materials, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during operations would be less than significant.

4.9b 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?

Less Than Significant Impact.

Construction

Project construction would require demolition of building and pavement materials that could result in the accidental release of hazardous materials. According to the California Department of Toxic Substances Control's (DTSC's) EnviroStor and State Water Resource Control Board's (SWRCB's) GeoTracker databases, there are no historic or active hazardous waste sites within or in the vicinity of the Project Site.[23,24] However, as mentioned in Threshold 4.9a above, due to the age of the existing parking garage that the Project Site is a part of, there is a potential that ACM and LBP are present on-site. Therefore, in compliance with existing federal and State OSHA standards, comprehensive asbestos and lead surveys would be completed to determine the presence, condition, friability and likely future condition of suspect or confirmed ACM or LBP. All suspect materials would be handled as ACM and/or containing LBP according to local, State, and federal regulations until the results of sampling and analysis indicate the material is a non-ACM or does not contain LBP. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which also does not contain any open hazardous waste sites per the EnviroStor and GeoTracker databases. The construction of proposed development within the Business Triangle would also be required to be tested for ACM and/or LBP and comply with pertinent regulations regarding the removal of ACM and/or LBP. Therefore, the Project would not exacerbate environmental hazards related to risk of upset or accident conditions associated with the exposure of ACM or LBP to the public or environment. Impacts during construction would be less than significant.

Operation

As previously discussed, the use of minor amounts of hazardous materials during operation of the Project would be limited to those similar to any other commercial development. Such hazardous materials typical of commercial developments are not considered environmental concerns. Moreover, the use of such materials would be subject to compliance with existing regulations, standards, and guidelines established by the federal, State, and local agencies related to storage, use, and disposal of hazardous materials. Additionally, regarding the ZTA and GPA associated with the Project, the operation of proposed development within the Business Triangle would include similar retail development, which would use similar amounts of hazardous

[23] California Department of Toxic Substances Control, EnviroStor, https://www.envirostor.dtsc.ca.gov/public/map/?myaddress. Accessed July 1, 2024.
[24] State Water Resources Control Board, GeoTracker, https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress. Accessed July 1, 2024.

materials and be required to comply with the same regulations regarding the storage, use and disposal of hazardous materials. As such, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not 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, impacts during operation would be less than significant.

4.9c Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The nearest school to the Project Site is the Good Shepherd Catholic School located approximately 0.17-mile southwest of the Project Site. All potentially hazardous materials used on the Project Site during Project construction and operations would be contained, stored, and used in accordance with manufacturer's instructions and handled in compliance with applicable federal and State standards and regulations. As discussed in Thresholds 4.9a and 4.9b, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. In addition, all construction work would be performed consistent with applicable federal and State OSHA requirements to ensure the safety and well-being of construction workers. Additionally, the ZTA and GPA associated with the Project would only affect development within the Business Triangle. Such development projects within the Business Triangle that are also located within one-quarter mile of an existing or proposed school would similarly be required to comply with pertinent federal and State regulations pertaining to the containment, storage, and use of potentially hazardous materials. Thus, with compliance with applicable laws, regulations, and manufacturers' instructions, the potential risks of exposure to hazardous materials for the public or the environment, including schools, due to Project construction would be less than significant.

4.9d Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the DTSC. The Cortese list contains hazardous waste and substance sites including public drinking water wells with detectable levels

of contamination, sites with known underground storage tanks having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program. The DTSC EnviroStor database provides DTSC's component of the Cortese List data. As mentioned in Threshold 4.9b above, the Project Site is not identified on the EnviroStor databases. Additionally, no sites within the City, including the Business Triangle that would be affected by the associated ZTA and GPA for the Business Triangle, are noted on the Cortese List. Therefore, no impact from the Project, including the adoption of the associated ZTA and GPA, would occur.

4.9e For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The Project Site is not located within or near the boundaries of an airport land use plan. The nearest airport is the Santa Monica Airport located approximately 3.9 miles southwest of the Project Site in the City of Santa Monica. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which is also not located within or near the boundaries of an airport land use plan or an airport. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not result in an airport-related safety hazard or excessive noise for people working in the Project area. There would be no impact.

4.9f Would the project impair implementation of or physically interfere with an emergency response plan or emergency evacuation plan?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The Project Site is located in an established urban area that is well-served by an existing roadway network. According to the Los Angeles County Department of Public Works, Santa Monica Boulevard, located approximately 90 feet southeast of the Project Site, is designated as a disaster route. This disaster route would not be subject to any lane closures as a result of the Project, as construction activities would be contained entirely within the Project Site and adjacent sidewalk. Therefore, the Project would not be expected to substantially interfere with or impair emergency response or evacuation plans, including the City's or County's Emergency Operations Plans. Furthermore, the Project would be designed according to applicable fire code standards. The Project would not involve any changes to the existing internal circulation and access routes for the existing parking garage on-site in such a way that the Project Site would continue to provide adequate circulation and access to facilitate emergency response. Project design and access

would be reviewed by the Beverly Hills Fire Department (BHFD) to ensure that emergency access would be maintained within the parking garage that the Project Site is a part of.

Additionally, the associated ZTA and GPA would only affect development within the Business Triangle. Such development projects would be similar in nature and scale to the Project and would therefore also unlikely require lane closures of disaster routes or substantially interfere with or impair emergency response or evacuation plans. Such development projects would also be required to be designed in accordance with applicable fire code standards.

Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not conflict with the City's adopted emergency response plan or emergency evacuation plan. There would be no impact.

4.9g Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The Project Site is in a fully urbanized area and is not adjacent to any wildland. Additionally, according to the California Department of Forestry and Fire Protection (CAL FIRE), the Project Site is not within a State Responsibility Area (SRA) or a very high fire hazard severity zone (VHFHSZ); see **Section 4.20: Wildfire**. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which is also developed with commercial and office uses and is not located within a SRA or VHSHZ. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not expose people or structures to a significant risk involving wildland fires. There would be no impact.

4.10 Hydrology and Water Quality

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?				X
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.				X
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				X
(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				X
iv) Impede or redirect flood flows?			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

Impact Analysis

4.10a Would the project violate water quality or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Construction

The Project's construction-related activities would only include demolition and would not include excavation or grading. The Project would not expose soils and thereby would not increase the potential for soils to be subject to wind and water erosion and for eroded soils and other pollutants to enter the soil drain system. Nevertheless, the Project would be required to prepare and Erosion and Sediment Control Plan (ESCP), which requires the implementation of BMPs during construction activities as best practice to reduce, prevent, minimize, and/or treat pollutants and prevent degradation of downstream receiving waters. Typical construction BMPs include, but are not limited to, gravel bags and fiber rolls. Implementation of construction BMPs would reduce or avoid contamination of stormwater with sediment and other pollutants such as trash and debris; oil, grease, fuels, and other toxic chemicals; paint, concrete asphalt, etc.; and nutrients. Similarly, the ZTA and GPA associated with the Project would only affect development within the Business Triangle. Such development projects also be required to prepare an ESCP and implement construction BMPs to minimize impacts to water quality. Therefore, water quality and waste discharge impacts from Project demolition, grading, and construction activities and the adoption of the associated ZTA and GPA for the Business Triangle would be less than significant.

Operation

Operation-related activities of the Project would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff. Requirements for waste discharges to stormwater from operation of developed land uses within the coastal watersheds of Los Angeles and Ventura Counties are in the Regional Phase I Municipal Separate Storm Sewer System National Pollutant Discharge Elimination System (NPDES) Permit (MS4 Permit), Order No. R4-2021-0105, issued by the Los Angeles Regional Water Quality Control Board (LARWQCB) in 2021. As the Project would result in the alteration of less than 50 percent of the impervious surface of the existing parking garage on-site (7,030 square feet including the proposed retail uses and relocation of three ADA parking spaces versus 96,850 square feet for the entire parking garage), the Project Site would be subject to the regulations regarding low impact development (LID) practices and standards in BHMC Section 9-4-508. Particularly, the Project would be required to implement a stormwater mitigation plan that incorporates postconstruction structural or treatment control LID BMPs. The LID BMPs would be required to be designed in accordance with the City's LID Standards Manual, which includes urban and stormwater runoff quantity and quality control development principles and technologies for achieving compliance with the provisions of BHMC Section 9-4-508. To meet the local MS4 permit and LID requirements consistent with the City's LID regulations and standards, stormwater management strategies would be implemented throughout the Project Site.

BHMC Section 9-4-508 states that new development and redevelopment projects are required to control pollutants and runoff volume from the Project Site by minimizing the impervious surface area and controlling runoff through infiltration, bioretention, and/or rainfall harvest and use in that preferred order. Infiltration is not considered geotechnically feasible given that the Project Site contains a portion of the ground floor of an existing parking garage with two subterranean levels and three above-ground levels. The Project would therefore implement the next BMP strategy, bioretention BMPs, in the form of approximately 300 square feet of planter

boxes. As the Project would include a greater square footage of planter boxes than existing conditions (approximately 250 square feet), implementation of the proposed LID features would improve surface water quality runoff compared to existing conditions. The proposed stormwater mitigation plan for the Project which includes the proposed bioretention BMPs would be subject to approval by the City. Additionally, operation of the Project itself would not result in discharges that would cause regulatory standards to be violated in the Los Angeles River Watershed.

Additionally, the associated ZTA and GPA would only affect development within the Business Triangle. Such development projects would also be required to comply with relevant regulations pertaining to water quality, including the regional MS4 Permit and the City's requirements regarding the implementation of a stormwater mitigation plan that incorporates postconstruction LID BMPs.

Therefore, water quality and waste discharge impacts from Project operation and the adoption of the associated ZTA and GPA for the Business Triangle would be less than significant.

For the reasons expounded above, impacts to water quality and waste discharge as a result of Project development, including the adoption of the associated ZTA and GPA for the Business Triangle, would be less than significant.

4.10b 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?

No Impact. The City is located within the Coastal Plain of the Los Angeles Groundwater Basin which is divided into multiple groundwater subbasins. The City overlies three of these subbasins, specifically the Hollywood Groundwater Basin, the La Brea Subarea of the Central Groundwater Basin, and the Crestal Subarea of the Santa Monica Groundwater Basin. Most of the City overlies the Hollywood Groundwater Basin, with smaller portions overlying the other two basins.[25] The Project Site lies entirely within the Hollywood Groundwater Basin.

The Project Site is developed with existing paved parking spaces within the parking garage on-site and a ten-story office building, and the Project Site is surrounded by commercial and office uses. Construction and operation of the Project would occur entirely within the ground floor of the parking garage on-site. The Project would not include any groundwater pumping and would instead rely on the local water purveyor for water (Beverly Hills Department of Public Works). Additionally, no water supply wells are located at or within one thousand feet of the Project Site. The Project would not include the construction of any water supply wells, nor would the Project impact any existing water supply wells. The Project Site is also not within a groundwater recharge area or facility, nor does it represent a source of groundwater recharge.

Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which also does not contain any water supply wells or is within a groundwater recharge area or facility. Additionally, similar development projects that may take advantage of the ZTA and GPA would also convert the ground floor of an existing parking structure to retail businesses

[25] City of Beverly Hills, 2020 Urban Water Management Plan, 2021, page 6-7, https://www.beverlyhills.org/DocumentCenter/View/5432/2020-UWMP---Final-PDF. Accessed July 16, 2024.

and would therefore also not involve groundwater pumping or the construction of groundwater wells.

Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that the Project would impede the basins' substantial groundwater management. There would be no impact.

4.10c Would the project substantially alter the existing drainage pattern of the site or area, including through the alterations of the course of 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?

No Impact. See Threshold 4.10a, above. The Project Site consists of a portion of the ground floor of the existing parking garage and office building on-site and is entirely impervious. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses.

Construction of the Project would be entirely contained within the Project Site and adjacent sidewalk and would not encroach on other levels of the parking garage. Construction activities would involve only minimal ground-disturbing activities within the existing utility right-of-way adjacent to the Project Site for connection to utility infrastructure that would involve minimal exposure of soils and would not involve excavation or grading. Additionally, development of the Project would maintain the imperviousness of the ground floor of the parking garage. The Project would also a greater square footage of planter boxes (300 square feet) than existing conditions (250 square feet), which would improve surface water quality runoff compared to existing conditions. Therefore, development of the Project would not alter the existing drainage pattern of the Project Site and would not result in substantial erosion or siltation on- or off-site.

The proposed ZTA and GPA would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle that would also convert the ground floor of existing parking structures to retail businesses. Such other potential development projects would therefore also likely involve similar construction activities involving minimal ground disturbance and soil exposure. The sites of such projects would likely also be entirely impervious, and the development of such projects would therefore also likely maintain the imperviousness of their respective sites. As such, the adoption of the ZTA and GPA would also not result in substantial erosion or siltation on- or off-site.

For the reasons expounded above, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not result in substantial erosion or siltation on- or off-site. There would be no impact.

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

No Impact. See Threshold 4.10c.i, above. As mentioned above, the Project Site is completely impervious, and Project development would maintain the level of imperviousness of the Project Site. Additionally, the Project would also a greater square footage of planter boxes (300 square

feet) than existing conditions (250 square feet), which would improve surface water quality runoff compared to existing conditions.

Similarly, as also mentioned above, the associated ZTA and GPA would only affect development within the Business Triangle that would also convert the ground floor of existing parking structures to retail businesses. The sites of such projects would therefore likely also be entirely impervious, and the development of such projects would also likely maintain the imperviousness of their respective sites. As such, the adoption of the ZTA and GPA would also not result in a substantial increase in the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.

Therefore, development of the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. There would be no impact.

(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

No Impact. As described above in Thresholds 4.10a and 4.10c.i, there would be no impact on the capacity of storm drainage systems and stormwater pollution.

(iv) Impede or redirect flood flows?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

According to the Federal Emergency Management Agency (FEMA), the Project Site is located in Zone X, which is defined as an area of minimal flood hazard. The Business Triangle that would be affected by the ZTA and GPA is also located in Zone X. However, according to the California Department of Water Resources' (DWR) Dam Breach Inundation Map Web Publisher, the Project Site and the Business Triangle are located within the dam inundation area of the Lower Franklin Reservoir.[26] The Lower Franklin Reservoir is a reservoir located approximately 1.75 miles north of the Project Site.

Lower Franklin Reservoir (No. 6-14) is classified by the DWR, Division of Safety of Dams (DSOD) as an extremely high downstream hazard. However, as of September 2023, the dam was given a Satisfactory Condition Assessment by the DWR DSOD, and no existing or potential dam safety deficiencies were recognized.[27] Acceptable performance is expected under all types of loading conditions (static, hydrologic, seismic) in accordance with the minimum applicable State or

[26] California Department of Water Resources (DWR), Dam Breach Inundation Map Web Publisher, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2. Accessed July 17, 2024.

[27] DWR Division of Safety of Dams, Dams Within Jurisdiction of the State of California, 2023, page 58, https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/All-Programs/Division-of-Safety-of-Dams/Files/Publications/DAMS-WITHIN-JURISDICTION-OF-THE-STATE-OF-CALIFORNIA-LISTED-ALPHABETICALLY-BY-DAM-NAME-SEPTEMBER-2023.pdf. Accessed July 17, 2024.

federal regulatory criteria or tolerable risk guidelines. FEMA requires that all dam owners develop Emergency Action Plans (EAPs) for warning, evacuation, and post-flood actions. An EAP identifies potential emergency conditions at a dam and specifies actions to be followed to help minimize loss of life and property damage should those conditions occur. EAPs include procedures dam owners will follow to issue early warning and notification messages to responsible downstream emergency management authorities. EAPs also include inundation maps to help dam owners and emergency management authorities identify critical infrastructure and population-at-risk sites that may require protective measures, warning, and evacuation planning. Thus, the potential for dam flooding at the Project Site is considered low. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not impede or redirect flood flows. Impacts would be less than significant.

4.10d In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

As noted in Threshold 4.10c.iv, the Project Site and the Business Triangle are in areas of minimal flood hazard. Although the Project Site and Business Triangle are within the dam inundation area of the Lower Franklin Reservoir, as of September 2023, no existing or potential dam safety deficiencies were recognized, and acceptable performance is expected under all types of loading conditions. Thus, the potential for dam flooding at the Project Site and the Business Triangle are considered low.

Tsunamis are sea waves that are generated in response to large-magnitude earthquakes. When these waves reach shorelines, they sometimes produce coastal flooding. The Project Site and the Business Triangle are located approximately 6.6 miles inland from Pacific Ocean and is therefore not at risk of tsunami.

Seiches are large waves generated in enclosed bodies of water in response to ground shaking. There are no enclosed bodies of water within or near the Project Site and the Business Triangle. Therefore, there would be no impact regarding seiches.

Based on the reasons above, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not risk release of pollutants due to floods, tsunami, or seiche. Therefore, impacts would be less than significant.

4.10e Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The Project Site is within the jurisdiction of the LARWQCB Basin Plan, which identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses, together known as water quality standards. The Project would not degrade water quality in a manner that would interfere with the beneficial uses of local surface water as established by the Basin Plan. As substantiated in Threshold 4.10a, implementation of

construction and post-construction BMPs as required by the County and City would reduce pollutants in stormwater runoff; therefore, the Project would not violate any water quality standards and therefore would not obstruct the implementation of the LARWQCB Basin Plan.

Furthermore, as described in Threshold 4.10b, the Project Site is within the Hollywood Groundwater Basin, which is identified by the Sustainable Groundwater Management Act (SGMA) as a very low priority basin.[28] The SGMA requires only medium- and high-priority basins to form groundwater sustainability agencies, develop groundwater sustainability plans, and manage groundwater for long-term sustainability. Therefore, the Hollywood Groundwater Basin does not require a sustainable groundwater management plan. Additionally, as further detailed in Threshold 4.10b, the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge.

Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which is also located within the jurisdiction of and would be subject to the LARWQCB Basin Plan. The Business Triangle is also within the Hollywood Groundwater Basin, and other potential development within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would also not decrease groundwater supplies or interfere substantially with groundwater recharge.

Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not conflict with or obstruction implementation of a water quality control plan or sustainable groundwater management plan. There would be no impact.

[28] Sustainable Groundwater Management Agency, SGMA Data Viewer, https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#boundaries. Accessed July 16, 2024.

4.11 Land Use and Planning

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				X
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?			X	

Impact Analysis

4.11a Would the project physically divide an established community?

No Impact. The Project Site consists of a portion of the ground floor of an existing parking garage and is surrounded by commercial office and retail uses. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

No new streets or other physical barriers which could physically divide an established community are proposed. Although established residential neighborhoods lie to the north and west of the Project Site across North Santa Monica Boulevard, Project development would not physically divide these neighborhoods in any way because the Project would be developed within the Project Site, and all off-site infrastructure improvements would be contained within the sidewalk adjacent to the Project Site such that they would not transect those neighborhoods. Access to the existing residential neighborhoods would not be impeded or cut off as a result of Project development.

Additionally, the associated ZTA and GPA would only affect similar development within the Business Triangle that would redevelop the ground floor of existing parking structures to retail businesses. As the ZTA and GPA would only allow for this specific type of increase in maximum allowable floor area within parcels that are already developed, other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would also not propose physical barriers that could physically divide an established community.

Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not physically divide an established community, and no impact would occur.

4.11b 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?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which

would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The Project Site has a General Plan land use designation of Commercial (Low Density General). The maximum allowable density in this land use designation is a FAR of 2.0, and the maximum allowable height is 45 feet. Additionally, the Project Site is zoned C-3 Commercial. According to BHMC Section 10-3-1601, principal uses permitted in this Zone include various commercial uses such as café, office, parking garage, store, shop for the conducting of wholesale or retail business, and store. Per BHMC Section 10-3-2745, the maximum FAR on any site area shall not exceed 2.0.

The Project proposes to convert a portion of the ground floor of the existing parking garage on-site to include new tenant spaces for retail businesses, which would be consistent with the permitted uses of the C-3 Commercial zone. The Project would increase the floor area of the Project parcel from 96,850 square feet to 103,647 square feet and increase the FAR from 2.65 to 2.84. The Applicant is requesting a ZTA and GPA to allow for additional floor area not to exceed 10 percent of the maximum allowable floor area for the Project Site. The Project would be designed in accordance with the land use and zoning development standards outlined in the City's General Plan Land Use Element and municipal code. Upon City approval of the proposed ZTA and GPA and the City's development review of the proposed site plans, no land use conflict related to General Plan or zoning consistency would occur. Furthermore, upon City approval of the ZTA and GPA, other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be required to comply with the provisions of the ZTA and GPA and other applicable City development regulations.

Additionally, per BHMC Section 10-3-2730, the Project would be required to provide one parking space per 350 square feet of commercial floor area, for a total of 20 additional spaces. However, AB 2097 (2022) (Government Code Section 65863.2) prohibits public agencies or cities from imposing a minimum automobile parking requirement on most development projects located within a half-mile radius of an existing or planned major transit stop. Pursuant to AB 2097, as the Project Site is approximately 0.31-mile northwest of the future Metro D Line Wilshire/Rodeo Station, the Project is eligible for automobile parking reduction. The Project would eliminate 29 existing parking spaces and relocate 3 ADA parking spaces within the ground floor of the existing parking garage on-site. Therefore, the Project's proposed parking would not conflict with the BHMC's parking standards.

Overall, for the reasons substantiated above, the Project would be consistent with the land use and zoning of the Project Site. Additionally, other potential development within the Business Triangle that may take advantage of the associated ZTA and GPA, for purposes of converting existing street level parking into retail use, would be consistent with the land use and zoning of the Business Triangle. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not conflict with any land use plan, policies, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

4.12 Mineral Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
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?				X

Impact Analysis

4.12a 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?

4.12b Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

According to the City's General Plan Conservation Element, the Project Site is located within Mineral Resource Zones (MRZ) 1 and 3.[29] MRZ 1 is defined by the California Geological Survey as areas of no mineral resource significance, and MRZ 3 is defined as areas that have undetermined mineral resource significance.[30] Additionally, the Project Site is in the vicinity of the Beverly Hills and San Vicente oil fields.[31] However, the Project Site is in an urbanized area of the City, and the Project Site is entirely developed with paved parking spaces within an existing parking garage, which preclude the accommodation of mining or drilling activities within or in the vicinity of the Project Site. Furthermore, the Project does not propose any mining or drilling activities. Additionally, there are no active mining or drilling activities within or near the Project Site.[32,33] No known resource appears to be present within or near the Project Site that would be valuable to the region or State residents and that would be lost due to the Project.

Additionally, the associated ZTA and GPA would only affect development within the Business Triangle, which is also within MRZ 1 and MRZ 3 and is developed with commercial and office uses that preclude the accommodation of mining or drilling activities within or in the vicinity of the

[29] City of Beverly Hills, General Plan Conservation Element, 2010, page 137, https://beverlyhills.org/DocumentCenter/View/5512/07-Conservation-PDF. Accessed July 12, 2024.
[30] California Geologic Survey, Guidelines for Classification and Designation of Mineral Lands, page 3, https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf. Accessed July 26, 2024.
[31] City of Beverly Hills, General Plan Conservation Element, page 139.
[32] DOC, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/. Accessed July 12, 2024.
[33] DOC, Mines Online, 2016, https://maps.conservation.ca.gov/mol/index.html. Accessed July 12, 2024.

Business Triangle. As with the proposed development for the Project, no known resource also appears to be present within or near the Business Triangle that would be valuable to the region or State residents and that would be lost due to other potential development within the Business Triangle.

Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. No impacts would occur.

4.13 Noise

This Section is based on the Noise and Vibration Analysis Memorandum prepared by Kimley-Horn, which is included in its entirety in **Appendix F: Noise and Vibration Analysis.**

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generate excessive groundborne vibration or groundborne noise levels?			X	
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?				X

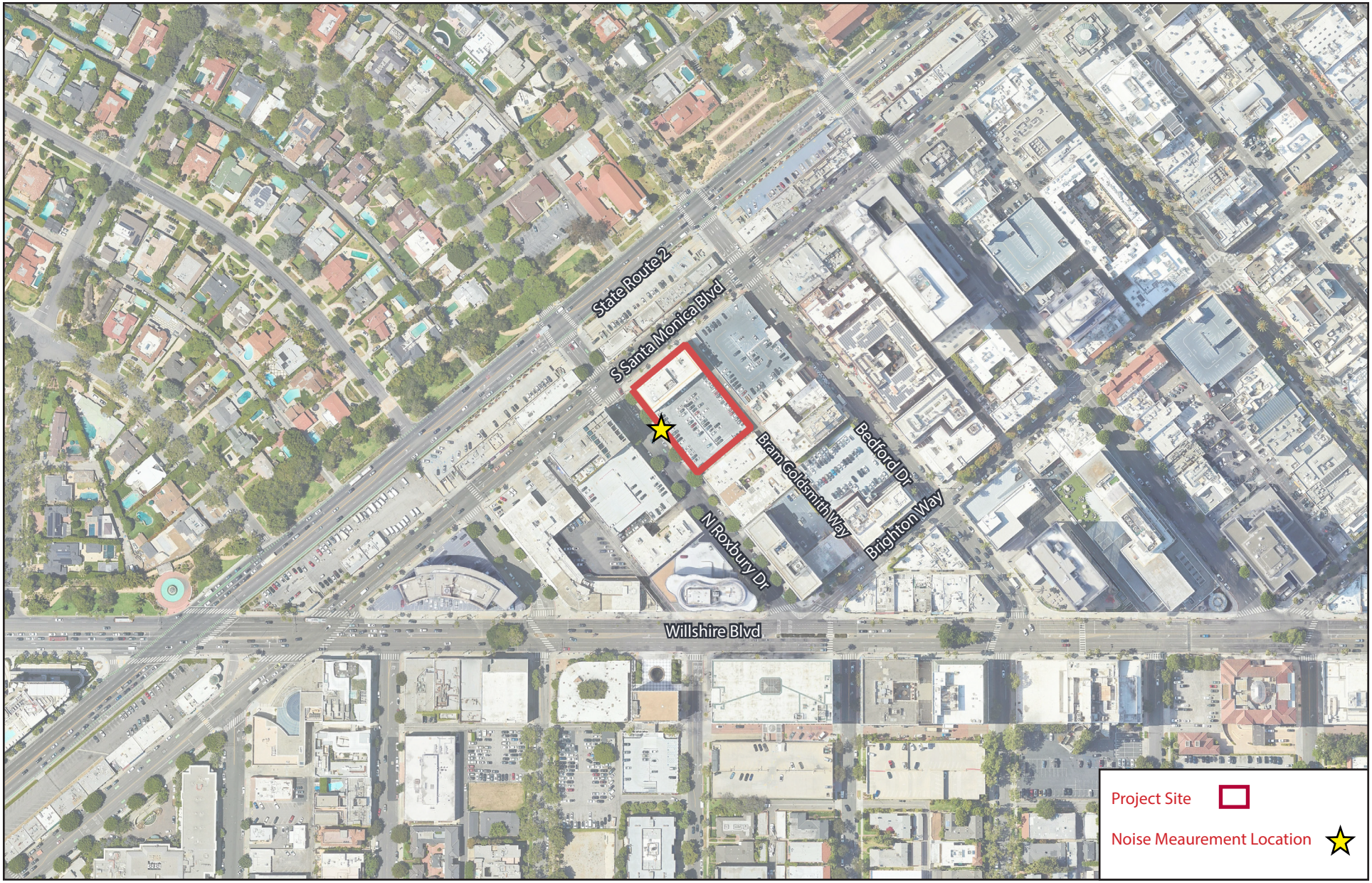
Existing Conditions

Existing Noise Levels

Mobile noise sources, especially cars, trucks motorcycles, and aircrafts, are the City's most common and substantial noise sources. The existing mobile noise sources in the Project area are the motor vehicles traveling on Santa Monica Boulevard, Bram Goldsmith Way, North Roxbury Drive, and SR-2. The primary stationary noise sources in the Project vicinity are those associated with the surrounding residential uses. Such stationary noise sources include mechanical equipment (e.g., HVAC equipment), moving vehicles, music playing, dogs barking, and people talking. The noise associated with these sources may represent a single-event noise occurrence or short-term noise.

Existing Ambient Noise Levels

To quantify existing ambient noise levels in the Project area, Kimley-Horn conducted one long-term noise measurement on July 9, 2024; see **Appendix F**. The noise measurement site (see **Figure 4.13-1: Noise Measurement Location**) was representative of typical existing noise exposure within and immediately adjacent to the Project Site. The 24-hour measurement was taken between 8:04 A.M. on July 9, 2024 to 8:04 A.M. the following day. Measurements of the equivalent sound level (L_{eq}) are considered representative of the noise levels throughout the day and are summarized in **Table 4.13-1: Existing Noise Measurement**, below.



SOURCE: Google Earth, 2024

FIGURE 4.13-1: Noise Measurement Location

Table 4.13-1: Existing Noise Measurement				
Site	**Location**	**Day (dBA L_{eq})**	**Night (dBA L_{eq})**	**Time**
1	Along North Roxbury Drive, at the Project Site	64.1	59.7	July 9, 2024 8:04 A.M. – July 10, 2024 8:04 A.M.
Source: Noise measurement taken by Kimley-Horn, July 9, 2024. See **Appendix F** for noise measurement results.				

Noise Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect varying noise sensitivities associated with uses. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health facilities, rehabilitation centers, convalescent centers, and retirement homes. The nearest sensitive receptors to the Project Site consist mostly of a church and residential communities located approximately 350 northwest of the Project Site.

Impact Analysis

4.13a Would the project result in generation 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?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Construction Noise

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction. Noise generated by construction equipment can reach high levels. During construction, exterior noise levels could affect the noise-sensitive receptors near the construction site.

The proposed construction activities would require tractors, concrete saws, and dozers during demolition; cranes, forklifts, and tractors during building construction; and air compressors during architectural coatings. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including dozers, excavators, loaders, forklifts, and air compressors, can reach high levels. L_{max} is the maximum level of a noise source environment and is often used as a threshold value for typical noise levels of construction activities. Typical noise levels associated with individual construction equipment are listed in **Table 4.13-2: Typical Construction Noise Levels**.

Table 4.13-2: Typical Construction Noise Levels	
Equipment	**Typical Noise Level (dBA L_{max}) at 50 feet from Source**
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Jack Hammer	88
Loader	80
Paver	85
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Shovel	82
Truck	84

1. Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1 + 20Log(d_1/d_2)$

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

Daytime construction noise is not typically a concern for human health and is a common occurrence within the urban environment. The impact analysis is based on the potential temporary increase in ambient noise and the construction time limits in the BHMC Section 5-1-205 including the allowable hours of hours of construction. Construction activity would occur within the allowable hours of construction including Mondays through Fridays 8:00 A.M. to 6:00 P.M. Construction is prohibited outside of these hours and on holidays.

The FHWA Roadway Construction Noise Model (RCNM) was used to calculate the worst-case construction noise levels at nearby sensitive receptors surrounding the Project Site during construction. All construction equipment was assumed to operate simultaneously and at the center of the Project Site to represent a worst-case noise scenario, as construction activities would routinely be spread throughout the construction site and would operate at different intervals. The modeled receptor locations represent the closest existing receiving land uses to Project construction activities. Noise levels at other sensitive receptors surrounding the Project Site would be located further away and would experience lower construction noise levels than the closest receptors modeled. **Table 4.13-3: Project Construction Noise Levels** shows estimated exterior daytime noise levels for each construction phase at the closest receptors without accounting for attenuation from intervening barriers, structures, or topography.

Table 4.13-3: Project Construction Noise Levels

Construction Phase	Land Use	Receptor Location		
		Direction	Distance (feet)[1]	Exterior Noise Level (dBA L_{eq})
Demolition	Residential/ Church	Northwest	410	68.2
Building Construction	Residential/ Church	Northwest	410	67.7
Architectural Coating	Residential/ Church	Northwest	410	55.4

1. Per the methodology described in the FTA *Transit Noise and Vibration Impact Assessment Manual* (September 2018), distances are measured from the nearby buildings to the center of the Project construction site.

Source: Federal Highway Administration, *Roadway Construction Noise Model,* 2006. Refer to **Appendix F** for noise modeling results.

Although the noise generated by Project construction would be higher than ambient noise levels, which may result in a temporary increase in ambient noise levels, construction would be temporary and cease once Project construction is completed. Construction activities would comply with BHMC Section 5-1-205 and would be prohibited outside the hours of Mondays through Fridays 8:00 A.M. to 6:00 P.M, and on Saturdays only if an after hours construction permit is issued pursuant to BHMC 5-1-205.C. While construction may cause short-term annoyance to adjacent uses, it would be temporary and restricted to the hours permitted by the City's noise ordinance. In addition, BHMC Section 5-1-205 states that construction work is prohibited any time on Saturdays within a residential zone or within five hundred feet of a residential zone unless issued an after hours construction permit. Therefore, construction noise impacts would be less than significant.

Construction Traffic Noise

In addition to on-site construction noise, the Project would generate mobile-source noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the project's construction. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a barely perceptible 3-dBA increase.

Haul trucks would travel to and from the Project Site using North Roxbury Drive. Haul and delivery trucks and construction workers are expected to arrive at the Project Site before construction starts and leave when construction ends, and thus, would not overlap with the noise generated by the Project's construction equipment. It is reasonable to assume that workers would already have arrived at the Project Site to begin demolition activities prior to the arrival of haul trucks. The greatest contributor to on-road traffic noise during construction would be haul trucks arriving from SR-2 to the Project Site along North Roxbury Drive. Therefore, this analysis only considers noise generated by haul trucks. According to modeling assumptions included in the air quality assessment prepared by Kimley-Horn in September 2024, the construction phase with the highest assumed number of haul trucks would be demolition, when it is assumed there would be up to 1 daily haul truck trip accessing the Project Site. Assuming that 1 haul truck would pass through the roadway segment along North Roxbury Drive within a 15-minute period, the estimated noise level from the demolition phase haul truck trips would be 48.5 dBA L_{eq} at 50 feet

from the roadway centerline. The estimated worst-case noise level would not result in increases of 5 dBA L_{eq} over ambient conditions or increases above the barely perceivable (3-dBA) criteria. In addition, 1 daily haul truck trip would not double existing traffic volumes along North Roxbury Drive and thus would not increase noise levels compared to existing conditions. Therefore, noise impacts from construction traffic would be less than significant.

Operational Noise

Project implementation would introduce new noise sources in the Project vicinity. The Project's primary noise sources that could potentially impact nearby noise-sensitive land uses include mechanical equipment (e.g., HVAC, etc.) and trash/recycling truck pickup noise.

Mechanical Equipment

Potential stationary noise sources related to long-term Project operations include mechanical equipment (e.g., HVAC equipment). Mechanical equipment typically generates noise levels of approximately 52 A-weighted decibels (dBA) at 50 feet. Noise has a decay rate due to distance attenuation, which is calculated based on the Inverse Square Law of sound propagation. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the noise source. Typically, a 5 dBA change in noise levels is required before any noticeable change in community response would be expected. HVAC equipment would be installed on the roof the Project Site south of an existing HVAC unit. The nearest sensitive receptors would be located 250 feet northwest from the HVAC equipment. As indicated in **Table 4.13-4: On-Site Composite Noise Levels**, noise levels from mechanical equipment at the Project Site would be 38.0 dBA L_{eq} at the nearest residential uses to the northwest and would not result in increases of 5 dBA L_{eq} over ambient conditions. Furthermore, HVAC equipment operations currently occur under existing conditions and would not be a new noise source. Therefore, the Project would result in a less than significant impact concerning mechanical equipment noise levels.

Trash/Recycling Truck Pickups

During loading and unloading activities of trash and recycling pickups, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting' braking activities, as well as the opening and closing of the trash/recycling bins. Trash/recycling truck pickup noise is typically 41.4 dBA L_{eq} at 50 feet. The trash room is located on the ground level. It is conservatively assumed that trash/recycling would occur along North Roxbury Drive, approximately 250 feet southeast of the nearest sensitive receptor (when measured from the trash room location rather than the parking lot boundary). Trash/recycling truck pickup noise would attenuate to approximately 27.4 dBA at the nearest noise receptors. As indicated in Table 4.13-4, noise levels from trash/recycling truck pickup at the Project Site would not result in increases of 5 dBA L_{eq} over ambient conditions at the nearest affected sensitive receptors. In addition, trash/recycling truck pickup activity servicing the Project area currently occurs under existing conditions and would not be a new noise source. The hours of trash/recycling pick up activity would be dependent on the service provider and not be regulated by the Project. Therefore, the Project would result in less than significant impacts concerning trash/recycling truck pickup noise levels.

Composite On-Site Noise Levels

An evaluation of the combined noise levels from the Project's various operational noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the nearest noise-sensitive receptors. In general, an increase of 3 dBA is considered to be barely perceptible, and a 5 dBA change in noise levels is required before any noticeable change in community response would be expected. Table 4.13-4 details the on-site noise levels from the Project Site at the nearest residential uses located approximately 250 feet away from mechanical and trash/recycling activities. As shown in Table 4.13-4, the composite on-site operational noise attributable to the Project would not increase ambient conditions at the residential uses. Composite noise levels would not exceed the Federal Transit Administration's (FTA's) (3 dBA) annoyance criteria or the City's (65 dBA Community Noise Equivalent Level [CNEL]) standard for exterior noise. Therefore, the Project would not result in a significant permanent increase in ambient noise levels.

Table 4.13-4: On-Site Composite Noise Levels

Receptor	Maximum On-Site Noise Levels by Source (dBA L_{eq})		Combined Noise Level at Receptor (dBA L_{eq})	Ambient Noise Level (dBA L_{eq})[1]	Ambient + Combined Project Noise (dBA L_{eq})	Incremental Increase over Ambient (dBA L_{eq})
	Mechanical Equipment	Trash/ Recycling				
Residential Community	38.0	27.4	38.4	64.1	64.1	0.0

1. See Table 4.13-1 for measured ambient noise level.

Mobile Traffic Noise

The Project is anticipated to generate 370 net daily trips. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a barely perceptible 3-dBA increase. Roxbury Drive (the primary access roadway to the Project Site) has an average daily traffic (ADT) volume of approximately 6,286 vehicles. The Project would result in approximately 370 net daily trips, which would not double the existing traffic volumes on North Roxbury Drive. Therefore, the Project would not result in increases of 5 dBA L_{eq} over ambient conditions or increases above the barely perceivable (3-dBA) criteria. Noise impacts from Project-related traffic noise would be less than significant.

<u>Proposed ZTA and GPA Noise Impacts</u>

Regarding the associated ZTA and GPA for the Project, given that the nature of other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use and should they meet the criteria, would be similar in nature and scale to the proposed development for this Project in that they would also involve the conversion of the ground floor of an existing parking structure to retail businesses, the construction and operational noise generated by the other potential development projects would be similar in nature and scale to that for this Project. As with the

Project, these other potential development projects would also be required to comply with regional and City regulations pertaining to noise, and mitigate impacts to a less than significant level, where applicable. As such, noise impacts from adoption of the associated ZTA and GPA would be less than significant.

For the reasons substantiated above, Project noise impacts would be less than significant.

4.13b Generate excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved.

The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. The City has not adopted specific standards for vibration impacts during construction. Therefore, the Caltrans Transportation and Construction Vibration Guidance Manual (2020) is used to evaluate construction vibration impacts related to potential building damage. As the closest structure is a commercial building, this evaluation uses the Caltrans architectural damage criterion for continuous vibrations at commercial buildings of 0.5 inches per second (in/sec) peak particle velocity (PPV) and the severe human annoyance criterion of 0.4 in/sec PPV.

Table 4.13-5: Typical Construction Equipment Vibration Levels identifies vibration velocity levels at 25 feet and at the nearest receptor for the type of equipment likely to operate at the Project Site during construction. As the Project would redevelop an attached parking garage into a commercial space, grading, excavation, and paving would not occur. Furthermore, construction activities would occur as close as one foot from an adjacent building. Due to existing site restrictions, a large bulldozer would not be utilized during construction.

Table 4.13-5: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 25 feet (in/sec)	Peak Particle Velocity at 1 foot (in/sec)[1]
Small Bulldozer/Tractors	0.003	0.375
Structure Damage Threshold	**0.5**	**0.5**
Exceeds Threshold?	**No**	**No**

1. Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance; PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018; D = the distance from the equipment to the receiver.

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

As shown in Table 4.13-5, the vibration velocities from construction would not exceed the Caltrans's architectural damage criterion (0.5 in/sec PPV) or human annoyance criterion (0.4 in/sec PPV) at 1 foot from the Project Site. Construction activities would occur throughout the Project Site and would not be concentrated at the point closest to the nearest building/structure. Therefore, the frequency of vibration events would be intermittent and temporary. The vibration impact from the construction equipment would be less than significant.

The Project would develop four retail spaces. Upon operation, there would be no sources of vibration on the Project Site. Therefore, vibration impacts during operation would be less than significant.

Proposed ZTA and GPA Vibration Impacts

Regarding the associated ZTA and GPA for the Project, given that the nature of other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be similar in nature and scale to the proposed development for this Project in that they would also involve the conversion of the ground floor of an existing parking structure to retail businesses, construction and operational vibration generated by the other potential development projects would be similar in nature and scale to that for this Project. As with the Project, these other potential development projects would also be required to comply with regional and City regulations pertaining to vibration, and mitigate impacts to a less than significant level, where applicable. As such, vibration impacts from adoption of the associated ZTA and GPA would be less than significant.

For the reasons expounded above, the Project would not generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant.

4.13c Would the project be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. Refer to Threshold 4.9e. The Project is not within two miles of the nearest airport and would not be impacted by airport noise. The nearest airport is the Santa Monica Airport located approximately 3.9 miles southwest of the Project Site in the City of Santa Monica. Additionally, there are no private airstrips located within the Project vicinity. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which is also not located within or near the boundaries of an airport land use plan or an airport. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not expose people residing or working in the Project area to excessive airport- or airstrip-related noise levels. No impact would occur.

4.14 Population and Housing

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Impact Analysis

4.14a Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Project construction would temporarily increase the number of persons present at the Project Site. However, these construction workers would only be present at the Project Site during Project construction. Once operational, the proposed retail uses would include full-time and/or part-time positions, which are anticipated to be hired from the local population and generally would not require households to relocate for such employment opportunities. As such, the Project would be unlikely to create new households in the area or generate an indirect demand for additional housing. Therefore, potential growth impacts would not be substantial. Additionally, the Project Site is in an urbanized area of the City with an established network of roads and other urban infrastructure; therefore, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

Additionally, the associated ZTA and GPA would only allow an increase in FAR for other potential development within the Business Triangle that would also convert the ground floor of existing parking structures to retail businesses. Similar to the proposed development for the Project, such other potential developments would require construction workers that would also be present during construction activities, and would include full-time and/or part-time positions that would also likely be hired from the local population during operation. As such, the associated ZTA and GPA would also be unlikely to create new households in the area or generate an indirect demand for additional housing. Additionally, the Business Triangle is developed and is also served by the established network of roads and other urban infrastructure within the area. Therefore, these

other potential developments would also not require the extension of such infrastructure in such a manner that would indirectly induce substantial population growth.

Therefore, for the reasons expounded above, impacts as a result of the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would be less than significant.

4.14b Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

There is no housing on the Project Site. Additionally, the associated ZTA and GPA would only affect development within the Business Triangle, which is developed with commercial and office uses and also does not contain housing. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not displace existing people or housing, or require construction of replacement housing elsewhere. No impact would occur, and no mitigation measures would be required.

4.15 Public Services

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physical altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

Impact Analysis

4.15a Fire Protection?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The BHFD provides fire, rescue, and emergency services to the City. The closest fire station to the Project Site is BHFD Station 1 located approximately 0.45-mile northwest of the Project Site at 445 North Rexford Drive. The Project would not modify the two existing driveways on North Roxbury Drive that currently provide access to the parking garage that the Project Site is within, but would slightly modify internal circulation patterns by replacing a number of parking spaces on the ground floor of the parking garage with retail uses and relocating three ADA parking spaces.

Project construction may require temporary closure of the ground level of the parking garage where the retail spaces would be developed, as well as the adjacent sidewalk along North Roxbury Drive for utility relocation. However, Project construction would not require the closure of any public streets during construction, and temporary construction activities would not impede the use of streets for emergencies or access for emergency vehicles. Once operational, the Project would include a range of full-time and/or part-time positions for the proposed retail uses. Because the Project would not include housing or other uses that would induce substantial population growth in the area, the Project would not increase demand on fire protection providers such that new facilities are required. The Project would be designed according to applicable fire code standards and would provide adequate circulation and access to facilitate emergency response during Project operation in accordance with BHFD standards.

Additionally, the associated ZTA and GPA would only affect similar development within the Business Triangle that would also convert the ground floor of existing parking structures abutting

public streets to retail businesses. As such, similar to the proposed development for the Project, these other potential development projects within the Business Triangle would also likely not require the closure of any public streets during construction activities or impede the use of streets for emergencies or access for emergency vehicles. The Project would temporarily increase the number of persons present at the sites that would only be present during construction. Once operational, these other potential development projects would also include full-time and/or part-time positions for potential retail uses and therefore not induce substantial population growth in the area and increase demand on fire protection providers such that new facilities are required. These other potential development projects would also be designed according to applicable fire code standards.

Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would result in a less than significant impact concerning fire protection services.

4.15b Police Protection?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The Beverly Hills Police Department (BHPD) provides police protection services to the City. The BHPD is approximately 0.5-mile northeast of the Project Site at 464 North Rexford Drive. As discussed in Threshold 4.15a, the Project construction may require the temporary closure of the entire parking garage and the adjacent sidewalk along North Roxbury Drive. However, Project construction would not encroach on adjacent roadways and would not impact street access and traffic flow and therefore would not impede the use of streets for police services or access for such services.

During operations, both driveways of the parking garage that the Project Site is within would continue to be secured by existing parking barriers that require visitors to press a button for a ticket to enter the parking garage. The Project would also include security measures such as security lighting and a surveillance camera system. The Project would temporarily increase the number of persons present at the Project Site that would only be present during construction activities, and a range of full-time and/or part-time employees during operation. Because the Project would not include housing or other uses that would induce substantial population growth in the area, the Project would not increase demand on police protection providers such that new facilities are required. The City's Public Works Department has verified that the Project would not be required to pay development impact fees to reduce potential impacts to public services, pursuant to BHMC Section 3-1-904.

Additionally, the associated ZTA and GPA would only affect similar development within the Business Triangle that would also convert the ground floor of existing parking structures abutting public streets to retail businesses. As such, similar to the proposed development for the Project, these other potential development projects within the Business Triangle would also likely not require the closure of any public streets during construction activities or impede the use of streets for police services or access to such services. The Project would temporarily increase the

number of persons present at the sites that would only be present during construction. Once operational, these other potential development projects would also include full-time and/or part-time positions for potential retail uses and therefore not induce substantial population growth in the area and increase demand on police protection providers such that new facilities are required. These other potential development projects would also likely include security measures. As such, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would result in a less than significant impact concerning police protection services.

4.15c Schools?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project would not include any residential uses. As mentioned, the Project would not induce population growth and thus would not increase the demand for school services. Additionally, as also mentioned, other potential development within the Business Triangle that may take advantage of the associated ZTA and GPA, for purposes of converting existing street level parking into retail use, would also not induce population growth and thus would also not increase the demand for school services. The Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not require new or physically altered school facilities and therefore would not result in adverse physical impacts in this regard. No impact concerning school facilities would occur.

4.15d Parks?

No Impact. See **Section 4.16, Recreation**, below.

4.15e Other public facilities?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Other public facilities such as libraries and community centers are typically provided to serve residents within the City. Given the Project has no residential component, Project implementation would not increase demand for other public facilities such as libraries and community centers. Similarly, given that other potential development within the Business Triangle that may take advantage of the associated ZTA and GPA, for purposes of converting existing street level parking into retail use, would also not include residential components, implementation of the ZTA and GPA would also not increase the demand for other public facilities such as libraries and community centers. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not require new or physically altered public facilities such as libraries and community centers and therefore would not result in adverse physical impacts in this regard. No impact concerning public facilities would occur.

4.16 Recreation

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) 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?				X
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?				X

Impact Analysis

4.16a 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?

4.16b 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?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. The recreational facility nearest the Project Site is Beverly Hills Park located approximately 350 feet northeast of the Project Site. Because the Project would not include housing or other uses that would induce substantial population growth in the area, the Project is not anticipated to increase the demand for existing recreational facilities or generate a demand for new ones. Further, Project implementation is not anticipated to increase the use of existing recreational facilities such that substantial physical deterioration of a facility would occur or be accelerated. Similarly, regarding the associated ZTA and GPA, because other potential development within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would also not include housing or other uses that would induce substantial population growth, these other potential developments are also not anticipated to increase the demand for existing recreational facilities or generate a demand for new ones, or increase the use of existing recreational facilities such that substantial physical deterioration of a facility would occur or be accelerated. The Project does not propose or require new or physically altered recreational facilities and therefore would not result in adverse physical impacts in this regard. No impacts would occur.

4.17 Transportation

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycles, and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?				X
d) Result in inadequate emergency access?				X

Impact Analysis

4.17a Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. Regional access to the Project Site is provided via SR-2 located approximately 175 feet northwest of the Project Site. Local access to the Project Site is provided via North Roxbury Drive and Bram Goldsmith Way (an alley) to the southwest and northeast of the Project Site, respectively. Pedestrian access is provided via the existing sidewalk along North Roxbury Drive. A Class 3 bicycle route is located along North Roxbury Drive, which is defined by the City's Complete Streets Plan as a designated preferred route for bicyclists on streets shared with motor vehicles.

Public transit access in proximity to the Project Site includes the Wilshire/Linden bus stop, which is located approximately 400 feet southwest of the Project Site and serves Metro Line 20; the Santa Monica/Camden bus stop, which is located approximately 600 feet northeast of the Project Site and serves Metro Line 4; and the Wilshire/Santa Monica bus stop, which is located approximately 740 feet southwest of the Project Site and serves Metro Lines 20 and 720. The Project Site is also approximately 0.31-mile northwest of the future Wilshire/Rodeo Station, which is a subway station currently under construction as part of Metro's D Line Extension project and is slated to open in 2026.

Construction activities for the Project may require temporary closure of the sidewalk fronting the Project Site along North Roxbury Drive for utility relocation and delivery of materials. However, such closures would be temporary. During temporary sidewalk closure, construction fencing would be erected around the Project Site and pedestrian access would be directed around the Project Site. These measures would be established in coordination with the City and would conform to City standards. The Project would not preclude enhancements to sidewalks or other policies, programs, or projects identified in the City's General Plan Circulation Element or the

City's Complete Streets Plan. The temporary sidewalk closure would also not hinder transit, roadway, or bicycle facilities or other plans, ordinances, or policies addressing the circulation system. Similarly, the associated ZTA and GPA would only affect similar development within the Business Triangle. These other potential development projects would therefore also likely require only temporary closures of sidewalks, which would also be coordinated with the City and conform to City standards.

Therefore, impacts as a result of development of the Project, including the adoption of the associated ZTA and GPA, would be less than significant.

4.17b Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

CEQA Guidelines Section 15064.3 codifies the change from level of service to VMT as a metric for transportation impact analysis. Pursuant to SB 743, VMT analysis is the primary method for determining CEQA impacts. According to CEQA Guidelines Section 15064.3(a), VMT refers to the amount and distance of automobile travel attributable to a project. The City's adopted CEQA Transportation Thresholds of Significance may be applied to screen projects from VMT analysis requirements if they will not have an impact under CEQA Guidelines Section 15064.3. Based on the OPR Technical Advisory, the City adopted three screening criteria that the City may use to identify whether a proposed project is expected to cause a less-than-significant impact without conducting a detailed study:

- Project type screening: Presumed less than significant impact for local serving retail projects (defined as less than 50,000 square feet per OPR's Technical Advisory) and projects that generate less than 110 average daily trips.
- Low VMT area screening: Presumed less than significant VMT impact for residential projects located in low VMT generating traffic analysis zones (TAZs). These TAZs generate total daily VMT per capita that is 15 percent less than the baseline level for the region.
- Transit Priority Area (TPA) screening: Presumed less than significant VMT impact for projects located in the commercial zones of TPAs (defined as within ½ mile of a Metro Rapid bus stop) and does not have the following characteristics:
    - FAR < 0.75
    - More parking than required by City, unless additional parking is being provided for design feasibility, such as completing the floor of a subterranean of structured parking facility, or if additional parking is located within the project site to serve adjacent uses
    - Inconsistent with the applicable SCAG RTP/SCS (as determined by the City)

The Project Site is in a TPA designated by SCAG, as the Project Site is located within 0.5-mile of the future Metro Line D Wilshire/Rodeo Station. Additionally, the Project would increase the FAR from 2.65 to 2.84. Upon Project development, the Project Site (inclusive of both the parking garage and office building and new retail spaces) would have a FAR greater than the TPA screening FAR threshold of 0.75. Additionally, as expounded in Threshold 4.8b, above, the Project is consistent with the 2020-2045 SCAG RTP/SCS. Therefore, the Project Site would satisfy the criterion for TPA screening and is presumed to have a less than significant VMT impact.

Similarly, given that the entire Business Triangle is also within 0.5-mile of major transit stops, and that other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be similar in nature and scale to the proposed development for the Project, these projects would also likely be screened from VMT analysis. Nevertheless, these projects would be required to conduct their own VMT screening analysis and comply with VMT measures, as applicable. As such, VMT impacts from these projects would also be less than significant.

Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not result in any significant effects relating to traffic pursuant to CEQA Guidelines Section 15064.3, and a detailed VMT analysis is not required. Impacts would be less than significant.

4.17c Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The Project Site is currently developed with a five-level parking garage consisting of two subterranean levels and three above-grade levels (including rooftop parking) and a ten-story office building. Vehicular access is currently provided via two in/out driveways along North Roxbury Drive. The Project proposes to eliminate 29 existing parking spaces and relocate three ADA parking spaces on the ground level of the parking garage to accommodate proposed retail spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Construction and operation of the Project would occur within the area currently occupied by the existing parking spaces to be removed or relocated. The Project would not encroach on the existing driveways or the existing internal drive aisle on the ground level and would maintain the existing general circulation and fire access lanes. The Project would be designed to comply with the City's current design requirements. Similarly, regarding the associated ZTA and GPA, other potential development within the Business Triangle that may also take advantage of the ZTA and GPA would also be required to be designed in accordance with the City's current design requirements. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not have the potential to increase hazards due to geometric design, and there would be no impact.

4.17d Would the project result in inadequate emergency access?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses. As expounded in Threshold 4.9f, the Project Site is located in an established urban area that is well-served by an existing roadway network. Santa Monica Boulevard, located approximately 90 feet southeast of the Project Site, is designated as a disaster route. This disaster route would not be subject to any lane closures as a result of the Project, as construction activities would be contained entirely within the Project Site boundaries. Furthermore, the Project would be designed according to applicable fire code standards. The Project would not encroach on the existing internal circulation and access routes of the rest of the parking garage not within the Project Site and would not interfere with emergency response. Project design and access would be reviewed by BHFD to ensure that emergency access would be maintained. Additionally, as also expounded in Threshold 4.9f, the associated ZTA and GPA would only affect development within the Business Triangle. Such other development projects would be similar in nature and scale to the Project and would therefore also unlikely require lane closures of disaster routes. Such development projects would also be required to be designed in accordance with applicable fire code standards to ensure that emergency access would be maintained. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not result in inadequate emergency access. There would be no impact.

4.18 Tribal Cultural Resources

This Section is based on AB 52 and SB 18 Communications initiated by the City; see **Appendix G: Assembly Bill 52 and Senate Bill 18 Communications**.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or			X	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

Impact Analysis

4.18ai Would the project cause a substantial adverse change in the significance of a tribal cultural resource, 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

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

As concluded in Threshold 4.5a, the Project Site is developed with an existing parking garage that is attached to a commercial office building within the same parcel. According to the Historical Resources Assessment prepared for the Project, the parking garage and office building are not individually eligible for listing in the National Register, California Register, or Beverly Hills

Register. However, given that a Beverly Hills Architectural Commission Report prepared by City staff in 2019 cited the subject property is a potential contributor to an eligible postwar commercial historic district, ARG is conservatively treating the district as a historical resource under CEQA. ARG found that the Project would not have a significant impact on historical resources, nor would the Project impact the subject property's potential eligibility as a district contributor.

Additionally, as also mentioned in Threshold 4.5a, the associated ZTA and GPA would only affect development within the Business Triangle. Other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, would be subject to the same CEQA requirements as the Project, and potential impacts to historic resources would be evaluated as part of those projects' environmental analysis. As such, the adoption of the ZTA and GPA would have a less than significant impact on historical resources.

Therefore, for the reasons expounded above, impacts as a result of Project development, including the adoption of the associated ZTA and GPA for the Business Triangle, would be less than significant.

4.18aii Would the project cause a substantial adverse change in the significance of a tribal cultural resource- a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact. As stated in Threshold 4.5b, a SLF search conducted with the NAHC resulted in positive findings within the vicinity of the Project area, and the NAHC recommended further consultation with the Gabrieleño/Tongva San Gabriel Band of Mission Indians in accordance with AB 52. A list was provided by NAHC of Native American tribes who may have knowledge of cultural resources in the area. On July 10, 2024, the City mailed notification pursuant to AB 52 and SB 18 to the following tribes:

- Soboba Band of Luiseno Indians
- Santa Rosa Band of Cahuilla Indians
- Gabrielino-Tongva Tribe
- Gabrielino/Tongva Nation
- Gabrielino Tongva Indians of California Tribal Council
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrieleno Band of Mission Indians – Kizh Nation
- Cahuilla Band of Indians

As described in Threshold 4.5b, the City received a response from the Gabrieleño Band of Mission Indians - Kizh Nation Tribe on July 13, 2024, indicating they had an interest in the Project at the time. A tribal consultation call was scheduled between the City and the Gabrieleño Band of Mission Indians - Kizh Nation Tribe on August 16, 2024. During the call after learning that the Project would involve no ground disturbance, the Gabrieleño Band of Mission Indians - Kizh Nation Tribe expressed no concerns with the Project. The Gabrieleño Band of Mission Indians - Kizh Nation Tribe requested that the City reach out to the Tribe for further assessment should there be a change to the Project. AB 52 and SB 18 consultation with the Gabrieleño Band of Mission Indians - Kizh Nation Tribe was concluded afterwards. The City also received a response from the Gabrielino Tongva Indians of California Tribal Council on July 24, 2024, indicating interest in the Project at the time. However, after City staff confirmed via email that the Project would involve no ground disturbance, the Gabrielino Tongva Indians of California Tribal Council expressed no concerns with the Project via email on July 24, 2024, and AB 52 and SB 18 tribal consultation efforts with the Gabrielino Tongva Indians of California Tribal Council concluded afterwards. To date, no other responses from the Native American community have been received as part of the AB 52 and SB 18 tribal consultation effort.

As discussed in the in Threshold 4.5b above, since no archaeological resources were identified within the Project Site as a result of the records search and associated research, it is unlikely that undisturbed archaeological resources are present within the Project Site given the extent of prior development. Additionally, the Project would involve only minimal ground-disturbing activities within the existing utility right-of-way adjacent to the Project Site for connection to utility infrastructure, and would not involve excavation or grading. As such, there is little potential for archaeological resources that meet the definition of “Historical Resources” or “Unique Archaeological Resources”, as defined by CEQA, to be identified within the Project area as a result of the Archaeological Resources Assessment. Regarding the associated ZTA and GPA, the ZTA and GPA would only affect development within the Business Triangle, which also has been heavily disturbed and is entirely developed with commercial and office uses.

4.19 Utilities and Service Systems

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects? i. Water, ii. Wastewater, iii. Wastewater Treatment, iv. Stormwater Drainage, v. Electric Power, Natural Gas, and Telecommunications.			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
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 projected demand in addition to the provider's existing commitments?			X	
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?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Impact Analysis

4.19a Require or result in the relocation or construction of new or expanded facilities concerning the following, the construction or relocation of which could cause significant environmental effects?

i. Water?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The Beverly Hills Department of Public Works owns and maintains the water infrastructure within the City. The nearest fire hydrants are located approximately 80 feet northwest and 349 feet southeast of the Project Site, both of which are publicly owned by the City.

During construction, water will be required intermittently for dust control and equipment. Since water usage during construction is typically less demanding than the water usage for the proposed Project, it is anticipated that existing water infrastructure would meet the limited, temporary water demand associated with construction of the Project, and that the water purveyor is able to provide water during construction.

The Project would require construction of new lateral connections to existing water lines. Construction impacts associated with the installation of water services would primarily involve trenching in order to place the lines sufficiently below the ground surface. When considering impacts resulting from the installation of any required water infrastructure, all impacts are of a relatively short-term duration (i.e., weeks to months) and would cease to occur once the installation is complete. Installation of new or relocation of existing water infrastructure will be limited to on-site water distribution, and minor off-site work associated with connections to the public main. No upgrades to public water mains, other than on-site infrastructure, are anticipated. Prior to ground disturbance, Project contractors would coordinate with the City to identify the locations and depth of all lines.

As the Project Site currently consists of a portion of the ground floor of an existing parking garage, it was conservatively assumed that the Project Site currently does not use any water. Upon Project development, the Project would develop approximately 6,797 square feet of retail spaces and relocate three ADA parking spaces. The Project's proposed water demand was estimated using 120 percent of the Los Angeles County Sanitation District's (LACSD) sewage generation factor of 100 gallons per day (gpd) per 1000 square feet for stores to account for any additional water demand for possible minor losses on-site, such as waste use due to human consumption (drinking, watering indoor plants, evaporation).[34] As such, the Project's proposed water demand is approximately 816 gpd.

To accommodate potential Project impacts to surrounding water infrastructure, the Project would construct new connections to the existing waterlines in the Project Site vicinity. The Project would also be required to pay a water supply fee pursuant to BHMC Sections 6-1-270 through 6-1-276 to mitigate potential impacts to the City's water infrastructure.

Additionally, similar to the Project, the associated ZTA and GPA would only affect other development projects within the Business Triangle that would be similar in nature and scale to the Project, which is also served by existing water infrastructure owned by the City. As these other potential development projects would also involve the conversion of the ground level of existing parking structures to retail businesses, the sites for these projects would also likely not have existing water use. Due to the increase of the proposed water use from the potential retail uses, these other potential development projects would also be required to pay a water supply

[34] Los Angeles County Sanitation District, Table 1: Loadings for Each Class of Land Use, https://www.lacsd.org/home/showpublisheddocument/3644/637644575489800000. Accessed June 28, 2024.

fee pursuant to BHMC Sections 6-1-270 through 6-1-276 to mitigate potential impacts to the City's water infrastructure.

For the reasons listed above, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not require in the relocation or construction of new or expanded water facilities. Impacts would be less than significant.

ii. Wastewater?

iii. Wastewater Treatment?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The Beverly Hills Department of Public Works maintains the wastewater collection and distribution system throughout the City. All wastewater generated by the City is collected and treated at Los Angeles Hyperion Water Reclamation Plant located in the City of Los Angeles. The Hyperion Water Reclamation Plant, owned and operated by Los Angeles City Sanitation (LASAN), has a design capacity of 450 million gallons per day (mgd) and an average flow of 272 mgd.[35]

Construction activities for the Project could result in temporary wastewater generation on-site. However, such generation would be temporary when compared with the wastewater generated by the proposed Project. In addition, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to direct wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities is not anticipated to cause any measurable increase in wastewater flows.

Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure will be limited to on-site wastewater distribution and minor off-site work associated with lateral connections to the existing City sewer main. Any work that may affect services to the existing sewer lines or impacts to LASAN facilities or plant will be coordinated with the City's Public Works Department. Furthermore, construction management and access plans would ensure safe pedestrian access as well as emergency vehicle access and safe vehicle travel. Moreover, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration and would cease to occur once the installation is complete.

As the Project Site currently consists of a portion of the ground floor of an existing parking garage, it was assumed that the Project Site currently does not generate wastewater. Upon Project development, the Project would develop approximately 6,797 square feet of retail spaces and

[35] Los Angeles City Sanitation, Hyperion Water Reclamation Plant Hyperion 2035 Program, https://www.ladwp.com/sites/default/files/documents/LASAN_Hyperion_2035_Program_Fact_Sheet.pdf. Accessed June 28, 2024.

relocate three ADA parking spaces. The Project's proposed wastewater generation was estimated using LACSD's sewage generation factor of 100 gpd per 1000 square feet for stores. As such, the Project's proposed wastewater generation is approximately 680 gpd. Therefore, the Project would contribute an estimated additional 680 gpd to the City's wastewater system. To mitigate the Project's potential impacts to the City's wastewater system, the Project would be required to apply for a permit to connect to the City's wastewater system, pursuant to BHMC Section 6-1-309 of the BHMC; the permit would be subject to City approval. Furthermore, the estimated wastewater generation during Project operations would comprise less than 0.000003 percent of the wastewater that is treated on an average daily basis by the Hyperion Water Reclamation Plant.

Additionally, similar to the Project, the associated ZTA and GPA would only affect other development projects within the Business Triangle that would be similar in nature and scale to the Project, which is also served by existing wastewater infrastructure owned by the City. As these other potential development projects would also involve the conversion of the ground level of existing parking structures to retail businesses, the sites for these projects would also likely not have existing wastewater generation. Due to the increase of the proposed wastewater use from the potential retail uses, these other potential development projects would also be required to pay a apply for a permit to connect to the City's wastewater system pursuant to BHMC Section 6-1-309 to mitigate potential impacts to the City's wastewater infrastructure. Given the nature of these other potential development projects, the estimated wastewater generation of these projects is not anticipated to be substantial such that it would require the relocation or construction of new or expanded wastewater treatment facilities including the Hyperion Water Reclamation Plant.

For the reasons substantiated above, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not require or result in the relocation or construction of new or expanded wastewater and wastewater treatment facilities. Impacts would be less than significant.

iv. Stormwater Drainage?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Refer to Threshold 4.10c concerning drainage patterns and stormwater drainage systems. As discussed in Threshold 4.10c, the Project would not change the drainage of the Project Site, and the Project would install a greater square footage of planter boxes compared to existing conditions (300 square feet versus 250 square feet) which would improve the quality of the stormwater runoff.

Similarly, as also mentioned in Threshold 4.10c, the associated ZTA and GPA would only affect development within the Business Triangle that would also convert the ground floor of existing parking structures to retail businesses. The sites of such projects would therefore likely also be

entirely impervious, and the development of such projects would also likely maintain the imperviousness or change the drainage of their respective sites.

The Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would therefore not require or result in the relocation or construction of new or expanded off-site stormwater facilities, the construction or relocation of which could cause significant environmental effects. Therefore, impacts would be less than significant.

v. Electric Power, Natural Gas, and Telecommunications?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The City's electrical power is provided by SCE, and natural gas is provided by SoCalGas. The City's telecommunications are provided by various companies. SCE, SoCalGas, and local telecommunications companies operate and maintain transmission and distribution infrastructure throughout the City. Refer to Thresholds 4.6a and 4.6b for further discussions concerning electricity. The Project would not include any natural gas usage; therefore, the Project would not result in an impact on natural gas. The Project would include on-site connections to existing telecommunication services. The Project would not require or result in the relocation or construction of new or expanded off-site electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

Additionally, the associated ZTA and GPA would only affect development within the Business Triangle, which is also served by SCE, SoCalGas, and local telecommunication companies. Given that the ZTA and GPA would only apply to other potential development projects similar to the Project that would also involve the conversion of the ground level of parking structures to retail uses, it is anticipated that such potential projects would have similar impacts on energy and would also not require or result in the relocation or construction of new or expanded off-site electric power, natural gas, or telecommunications facilities.

Therefore, Project impacts would be less than significant.

4.19b Would the project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

The City receives approximately 92 percent of its water supply from the Metropolitan Water District (MWD). The remainder of the City's water supply is pumped from the local Hollywood

Groundwater Basin, and with the construction of a new well by 2022, the La Brea Subarea of the Central Groundwater Basin.

The City of Beverly Hills 2020 Urban Water Management Plan (UWMP) provides a framework for long-term water planning for the City's water service area, which is approximately 6.35 square miles. The plan states that due to water conservation measures, water use has decreased in the service area since 2010, even with increases in population. Tables 4.19-1 through 4.19-3 show the expected supply and demand during each hydrologic year type with a 20-year projection from 2025 to 2045. The MWD provided the model output of the reliability forecast for the City which was used in the City's UWMP. The normal year was defined as the average of hydrologies for the years 1922 to 2017, as shown in **Table 4.19-1: Normal Year Supply and Demand Comparison**. A single dry year was considered as being equivalent to the supply and demand for the single driest year hydrology of 1977 for the MWD, as shown in **Table 4.19-2: Single Dry Year Supply and Demand Comparison**. A five consecutive year drought was based on a repeat of the hydrology of the years 1988 to 1992, which represents the driest five-year historical sequence in the MWD's water supply, as shown on **Table 4.19-3: Multiple Dry Years Supply and Demand Comparison**.[36]

Table 4.19-1: Normal Year Supply and Demand Comparison

Normal Year	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)
Supply Totals	11,933	12,131	12,340	12,582	12,768
Demand Totals	11,933	12,131	12,340	12,582	12,768
Difference	0	0	0	0	0

AFY = acre-foot per year
Source: City of Beverly Hills, 2020 Urban Water Management Plan, 2021.

Table 4.19-2: Single Dry Year Supply and Demand Comparison

Single Dry Year	2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)
Supply Totals	11,933	12,131	12,340	12,582	12,768
Demand Totals	11,933	12,131	12,340	12,582	12,768
Difference	0	0	0	0	0

AFY = acre-foot per year
Source: City of Beverly Hills, 2020 Urban Water Management Plan, 2021.

Table 4.19-3: Multiple Dry Years Supply and Demand Comparison

Multiple Dry Years		2025 (AFY)	2030 (AFY)	2035 (AFY)	2040 (AFY)	2045 (AFY)
First Year	Supply Totals	12,064	12,264	12,476	12,720	12,908
	Demand Totals	12,064	12,264	12,476	12,720	12,908
	Difference	0	0	0	0	0
Second Year	Supply Totals	12,219	12,422	12,636	12,884	13,074
	Demand Totals	12,219	12,422	12,636	12,884	13,074
	Difference	0	0	0	0	0
Third Year	Supply Totals	12,255	12,459	12,673	12,922	13,113

[36] City of Beverly Hills, 2020 Urban Water Management Plan, pages 7-4 and 7-5.

	Demand Totals	12,255	12,459	12,673	12,922	13,113
	Difference	0	0	0	0	0
Fourth Year	Supply Totals	11,826	12,022	12,229	12,469	12,653
	Demand Totals	11,826	12,022	12,229	12,469	12,653
	Difference	0	0	0	0	0
Fifth Year	Supply Totals	11,969	12,167	12,377	12,620	12,806
	Demand Totals	11,969	12,167	12,377	12,620	12,806
	Difference	0	0	0	0	0

AFY = acre-foot per year
Source: City of Beverly Hills, 2020 Urban Water Management Plan, 2021.

As shown in Tables 4.19-1 through 4.19-3, the City's water demands during normal year, single dry-year, and multiple dry year supply scenarios are projected to be met through 2045. Additionally, the associated ZTA and GPA would only affect development within the Business Triangle, which is also entirely included within the City. As such, other potential development projects within the Business Triangle that may take advantage of the ZTA and GPA, for purposes of converting existing street level parking into retail use, are also accounted for in the City's UWMP. Therefore, the City would have sufficient water supplies available to serve the Project. Impacts would be less than significant.

4.19c 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 projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

As demonstrated in Thresholds 4.19a.ii and 4.19a.iii, there is existing treatment capacity in the region for estimated Project wastewater generation. Project development, including the adoption of the associated ZTA and GPA, would not impact the Hyperion Water Reclamation Plant's treatment capacity. The Project, including the adoption of the associated ZTA and GPA, would not require or result in the relocation or construction of new or expanded off-site sewer facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project impacts would be less than significant.

4.19d 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?

4.19e Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project

also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

Solid waste in the City is collected by the City of Beverly Hills Department of Public Works, which contracts with Athens Services. Solid waste from the City is disposed at various landfills throughout Los Angeles County at Class III landfills.

Project construction would result in generation of construction and demolition (C&D) debris such as metal scrap and concrete which would be collected and diverted to a C&D debris facility for materials to be recycled and/or discarded. As shown in **Table 4.19-4: Estimated Solid Waste Generation**, C&D of the Project is estimated to generate approximately 459 tons of C&D debris. This estimation is a conservative estimate as it assumes that no reductions in waste generation would occur due to recycling.

Table 4.19-4: Estimated Solid Waste Generation

Land Use	Size	Waste Generation Rate	Waste Generated (tons)	Waste Generated (lbs)
Demolition[1]				
Parking[2]	9.650 ksf	46 tons/ksf	443.90 tons	887,800 lbs
Construction[3]				
Commercial	6.797 ksf	4,020 lb/ksf	13.67 tons	27,324 lbs
Parking	0.703 ksf	4,020 lb/ksf	1.41 tons	2,826 lbs
Total Demolition and Construction Waste			*459 tons*	*917,950 lbs*
Operations[3]				
Commercial	6.797 ksf	5 lb/ksf/day	0.017 tons/day	33.99 lbs/day
Total Operational Waste			*0.017 tons/day*	*33.99 lbs/day*

ksf = thousand square feet; lbs = pounds; tpd = tons per day
1. The demolition waste generation rate of 46 tons/ksf is based on the CalEEMod User Guide Appendix A, page 13.
2. Parking includes building components (i.e., concrete and metal façade, existing planters, flooring, etc.) associated with removal of parking spaces within the Project Site.
3. The construction waste generation rate of 4,020 lb/ksf is based on the U.S.EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.
4. Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed June 28, 2024.

Residual wastes such as trash packing materials, and plastics could require disposal at landfill. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations. All construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. The Project would be required to comply with the California Integrated Waste Management Act of 1989 (AB 939), which requires that at least 50 percent of waste produced is recycled, reduced, or composted and is included in BHMC Section 9-1-1001, which would achieve compliance with State law.

As detailed in Table 4.19-4, Project operations would generate approximately 0.017 tons per day (tpd). The estimated amount of solid waste is conservative because the waste generation factors do not account for recycling or other diversion measures. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 137 million tons of

remaining disposal capacity at the County's Class III landfills.[37] As such, the solid waste generated by the Project would be accommodated by the landfills that serve the Project Site.

During operation, the Project would be required to comply with CalRecycle's waste diversion rate target of 50 percent of the waste stream. The Project would also be subject to AB 1826, which requires businesses to provide separate recycling bins for organic waste. Therefore, the Project would be subject to compliance with the CALGreen Code, State regulations, and City regulations regarding solid waste management and reduction. Similarly, development within the Business Triangle that may take advantage of the associated ZTA and GPA, for purposes of converting existing street level parking into retail use, would also be subject to the same State and City regulations regarding solid waste management and reduction. As such, impacts would be less than significant.

[37] Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan: 2021 Annual Report, December 2022, https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=17450&hp=yes&type=PDF. Accessed June 27, 2024.

4.20 Wildfire

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
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?				X
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?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Impact Analysis

4.20a 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?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

According to CAL FIRE, the Project Site is not within an SRA. The nearest SRA is located approximately 9.4 miles west of the Project Site in the Santa Monica Mountains. Additionally, the Project Site is not within an VHFHSZ. However, the nearest VHFHSZ is a Local Responsibility Area (LRA) located approximately 0.9-mile northwest of the Project Site.[38]

As detailed in Threshold 4.9f, the Project Site is in an established urban area that is well-served by an existing roadway network. According to the Los Angeles County Department of Public Works, Santa Monica Boulevard, located approximately 90 feet southeast of the Project Site, is designated as a disaster route.[39] This disaster route would not be subject to any lane closures as

[38] California Department of Fire and Forestry Protection, Fire Hazard Severity Zone Viewer, 2024, https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/. Accessed June 12, 2024.
[39] Los Angeles County Department of Public Works, City of Beverly Hills, 2009, https://dpw.lacounty.gov/dsg/DisasterRoutes/map/beverly%20hills.pdf. Accessed June 12, 2024.

a result of the Project, as construction activities would be contained entirely within the Project Site boundaries and adjacent sidewalk. Therefore, the Project would not be expected to substantially interfere with or impair emergency response or evacuation plans, including the City's or County's Emergency Operations Plans.[40,41] Furthermore, the Project would be designed according to applicable fire code standards. The Project would not involve any changes to the existing internal circulation and access routes for the existing parking garage that the Project Site is a part of in such a way that the Project Site would continue to provide adequate circulation and access to facilitate emergency response. Project design and access would be reviewed by BHFD to ensure that emergency access would be maintained within the parking garage that the Project Site is a part of.

Additionally, as also detailed in Threshold 4.9f, the associated ZTA and GPA would only affect development within the Business Triangle, which is also not located within an SRA or VHFHSZ. Such other development projects would be similar in nature and scale to the Project and would therefore also unlikely require lane closures of disaster routes or substantially interfere with or impair emergency response or evacuation plans. Such development projects would also be required to be designed in accordance with applicable fire code standards.

Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not conflict with the City's adopted emergency response plan or emergency evacuation plan, and there would be no impact.

4.20b 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?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

As mentioned above in Threshold 4.20a, the Project Site is not within or near a SRA. Additionally, the Project Site is not within a VHFHSZ but is located approximately 0.9-mile northwest of a LRA designated as a VHFHSZ. The Project Site is relatively flat and entirely developed within the ground floor of an existing parking garage, which precludes factors such as slopes or strong winds from exacerbating fire risk. Similarly, the entire Business Triangle that would be affected by the associated ZTA and GPA is also relatively flat and entirely developed, which also precludes these factors. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and there would be no impact.

4.20c If located in or near state responsibility areas or lands classified as very high fire hazard

[40] Los Angeles County, Operational Area Emergency Operations Plan, 2023, https://ceo.lacounty.gov/wp-content/uploads/2023/11/County-of-Los-Angeles-OAEOP-2023-Final-for-Website.pdf. Accessed June 12, 2024.
[41] City of Beverly Hills, 2013 Emergency Operations Plan (EOP), 2023, https://www.beverlyhills.org/183/Emergency-Operations-Plan. Accessed June 12, 2024.

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?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

As mentioned above in Threshold 4.20a, the Project Site is not within or near a SRA. Additionally, the Project Site is not within a VHFHSZ but is located approximately 0.9-mile northwest of a LRA designated as a VHFHSZ. The entire City is served by existing public utilities. The Project proposes to convert a portion of the ground floor of an existing parking garage to retail spaces, which would require the installation of new private water, wastewater, electrical, and HVAC infrastructure on-site. New and improved infrastructure within the Project Site would connect to existing public utilities and would not require the installation or maintenance of infrastructure that may exacerbate fire risk. Similarly, given that other potential developments within the Business Triangle that may take advantage of the associated ZTA and GPA, for purposes of converting existing street level parking into retail use, would be similar in nature and scale to the proposed development for the Project, such projects would also likely connect to existing public utilities that serve the City and would also not require the installation or maintenance of infrastructure that may exacerbate fire risk. Therefore, impacts would be less than significant.

4.20d 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 downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project would convert a portion of the ground floor of the existing parking garage on-site to retail uses and relocate three ADA parking spaces. The Project also proposes a ZTA and GPA which would be applicable to the Project Site for the proposed Project and to other potential sites within the Business Triangle that meet the ZTA and GPA criteria.

As mentioned above in Threshold 4.20a, the Project Site is not within or near a SRA. Additionally, the Project Site is not within a VHFHSZ but is located approximately 0.9-mile northwest of a LRA designated as a VHFHSZ. The Project Site is relatively flat and developed within the ground floor of an existing parking garage. Post-fire impacts such as drainage changes and landslides would not occur as the Project Site and its surroundings are highly urbanized and mostly flat and not have any steep slopes or hillsides that would be susceptible to landslides or flooding. Similarly, the associated ZTA and GPA would only affect development within the Business Triangle, which is also relatively flat and not susceptible to landslides or flooding. Therefore, the Project, including the adoption of the associated ZTA and GPA for the Business Triangle, would not expose people or structure to significant risks including downslope or downstream flooding or landslides, and there would be no impact.

4.21 Mandatory Findings of Significance

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	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?			X	
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 the past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Impact Analysis

4.21a 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?

Less Than Significant Impact. As discussed throughout this IS/ND, the Project does not have the potential to degrade the environment's quality or result in significant environmental impacts that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., federal, State, and local regulations) and the conditions of approval for the Project.

As concluded in **Section 4.4: Biological Resources**, the Project would not reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

As concluded in **Section 4.5: Cultural Resources**, the Project would not eliminate important examples of the major periods of California history. The Project would not impact the parking

garage's potential eligibility as a contributor to an eligible postwar historic district identified by City staff in 2019. Due to extensive disturbance within the Project Site, the potential to encounter in-situ archaeological resources and human remains is low. Following compliance with the City's conditions of approval addressing protocol for inadvertent discovery of archaeological resources, potential impacts to archaeological resources would be less than significant.

As concluded in **Section 4.18: Tribal Cultural Resources**, the Project could cause an adverse change in the significance of a tribal cultural resource.

4.21b 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 the past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts." This analysis of cumulative impacts need not be as in-depth as the analysis of the Project's impacts, but instead is to "be guided by the standards of practicality and reasonableness."

As listed in **Table 4.21-1, Related Projects,** the City identified 20 projects within an approximately 0.5-mile radius of the Project Site. As shown therein, the nearest related projects are Related Project No. 2, a cosmetic spa project located at 425 North Bedford Drive approximately 260 feet east of the Project Site; Related Project No. 1, a cosmetic spa project located at 414 North Bedford Drive approximately 390 feet east of the Project Site; and Related Project No. 7, an automobile dealership project located at 9737 Wilshire Boulevard approximately 442 feet southwest of the Project Site.

Table 4.21-1: Related Projects

No.	Address	Project Description
1	**414 N. Bedford Drive**	Request to establish a ground floor for cosmetic spa
2	**425 N. Bedford Drive**	Request to establish a ground floor cosmetic spa
3	**414 N. Beverly Drive**	Request to construct a new three-story commercial building with rooftop outdoor; continue operating 22 square feet of open air dining on private property and 165 square feet on the public right-of-way.
4	**499 N. Canon Drive**	Request to allow rooftop dining
5	**370 N. Rodeo Drive**	Request to construct a three-story commercial building
6	**9600 Wilshire Boulevard**	Request for a new Specific Plan to allow a new 6-story office building; a new 7-story office building; two new 6-story multi-family residential buildings with a combined total of up to 70 units; rehabilitation of the historic Saks Fifth Avenue building for use as a private social club with 40 hospitality suites and spa uses; and various public right-of-way improvements.
7	**9737 Wilshire Boulevard**	Request to establish an automobile dealership
8	**9800 Wilshire Boulevard & 121 Spalding Drive**	A review of Spring Place's operations, pursuant to Condition 16 of Resolution No. 2027.

9	**265 N. Beverly Drive**	Request to establish open air dining on public property
10	**475 N. Beverly Drive**	Request to establish open air dining on public property
11	**414 N. Camden Drive**	Request to establish an overnight stay facility in an existing medical suite
12	**140 S. Camden Drive**[1]	Preliminary Application to construct a 15-story, 26-unit multi-family residential building.
13	**145 S. Rodeo Drive**	Request to construct a 15-story, 30-unit mixed use building.
14	**9850, 9876, 9900, 9988 Wilshire Boulevard** (One Beverly Hills)	To Demolish 3,521 SF of service station and 166,834 SF of Beverly Hilton floor area: 340 Condominium units (net increase of 340 units) 619 Hotel rooms (net decrease of 120 rooms) Public Park (4.5 acres); Aman Hotel- 225,597 SF and 79 hotel rooms (included in 619 total); Promenade and Park Pavilion - 109,852 SF; Conference Center - 31,536 SF; Hilton Enhancement - 83,370 SF and 18 hotel rooms (included in 619 total); Hilton Hotel - 350,789 SF and 352 hotel rooms (included in 619 total); Waldorf Astoria - 207,026 SF and 170 hotel rooms (included in 619 total)
15	**140 S. Lasky Drive**	Four-story hotel with 66 rooms, 1,845 SF restaurant (898 SF indoor, and 947 SF outdoor), rooftop uses (roof deck and pool deck), and three levels of subterranean parking with 94 parking spaces.
16	**125-129 S. Linden Drive**	19-story mixed use development with 165 residential units and a 73-room hotel
17	**317 N. Beverly Drive**	To construct three-story, 14,343 SF commercial/office building with 13 on-site parking spaces (12 within alternative parking facility, one accessible); 28 parking spaces provided through participation in City's in-lieu parking program
18	**250 N. Crescent Drive**	To construct eight-unit MFR building with 14 parking spaces
19	**313-323 N. Rodeo Drive**	To construct new 30,000 SF commercial building with rooftop uses and one level of subterranean parking (alternative parking facility)
20	**9900-9908 S. Santa Monica Blvd.**	To construct mixed-use multi-family and commercial: 12,560 SF of commercial, 17 condo units

1. Proposed per Government Code Section 65589.5.
Source: City of Beverly Hills, August 2024.

Aesthetics – All of the related projects are at a distance such that they would not share the same viewshed and would not have a potential to combine with the Project to create a cumulative aesthetics impact. As provided in **Section 4.1, Aesthetics,** no scenic vistas are available from the Project Site, and the Project would not result in any cumulative impacts related to scenic vistas. There are no State-designated scenic highways within the City, and the Project would not result in any cumulative impacts related to scenic highways. As with the Project, the related projects would be reviewed on a case-by-case basis by the City to comply with BHMC requirements regarding building heights, setbacks, massing, and lighting for those projects that require discretionary actions, to undergo site-specific review regarding building density and design, glare,

and light. Lastly, the Project would result in less-than-significant aesthetics impacts and thus would not contribute considerably to cumulative aesthetics impacts. For all these reasons, cumulative aesthetics impacts would be less than significant.

Agriculture and Forestry Resources – As expounded in **Section 4.2, Agriculture and Forestry Resources**, of this IS/ND, the Project Site is entirely developed and consists of a portion of the ground floor of an existing parking garage. No agricultural or forestry uses exist within or in the vicinity of the Project Site. Therefore, the Project would not convert agricultural or forestry uses to other uses. Additionally, the Project Site and adjacent properties are not designated or zoned for agricultural or forestry use, nor are the Project Site and adjacent parcels subject to Williamson Act contracts. Furthermore, none of the related projects converting agricultural or forestry uses to other uses. Therefore, the Project would not contribute considerably to cumulative agriculture and forestry resources impacts, and cumulative agriculture and forestry resources impacts would be less than significant.

Air Quality – According to SCAQMD, a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts (i.e., if an individual project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase). As indicated in **Section 4.3, Air Quality**, of this IS/ND, the Project's construction- and operations-related air quality impacts would be less than significant. Therefore, the Project would not contribute considerably to cumulative air quality impacts, and cumulative air quality impacts would be less than significant.

Biological Resources – As provided in **Section 4.4, Biological Resources**, of this IS/ND, there is no native habitat within or near the Project Site to support sensitive plant or animal community or special status species. The Project Site is either out of range for such species or would not provide suitable habitat due to its highly disturbed nature and the fact that the Project Site is in a highly urbanized area of the City. The Project Site does not serve as habitat for fish or wildlife species. The Project would not remove protected trees, and the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other such plan. Additionally, related projects would be required to comply with the City's tree ordinance provided in BHMC Sections 10-3-2900 through 10-3-2906, Migratory Bird Treaty Act regulations, and other applicable biological resources regulations, as well as with CEQA for those projects subject to CEQA review. Furthermore, to the extent that the related projects would result in significant impacts to biological resources, they would be required to implement mitigation to reduce or avoid the impacts. Thus, as the Project would not result in significant impacts to biological resources, the Project would not contribute considerably to cumulative biological resources impacts, and cumulative biological resources impacts would be less than significant.

Cultural Resources – Cumulative impacts to historical resources would occur if the Project and related projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As detailed in **Section 4.5, Cultural Resources**, of this IS/ND, in a Beverly Hills Architectural Commission Report prepared by the City in 2019, the parking garage that contains the Project Site and the attached office building are noted as potential

contributors to an eligible postwar commercial historic district. However, the Project Site is not individually eligible for listing in the National Register, California Register, or the Beverly Hills Register. Furthermore, because the Project would preserve the vast majority of the parking garage's extant historic materials and features, the parking garage and attached office building would retain the physical characteristics that account for their potential eligibility as a contributor to the eligible postwar commercial historic district. Therefore, the Project would not cause a substantial adverse impact in the significance of a historical resource. Additionally, the other potential development projects would be subject to the same CEQA requirements as the Project and potential impacts to historic resources would be evaluated as part of those projects' environmental analysis. The determinations regarding impacts to historical resources from other development projects would be made on a case-by-case basis, and the impacts of cumulative development on historical resources would be mitigated to the extent feasible. As such, cumulative historical resources impacts would be less than significant.

For archaeological resources, all related projects are subject to applicable regulations formulated to avoid significant archaeological resource impacts. In addition, as applicable, related projects would be required to conduct site-specific SLF or records searches with the SCCIC to determine if any applicable results would affect the related projects. Additionally, the other potential development projects would be subject to the same CEQA requirements as the Project and potential impacts to archaeological resources would be evaluated as part of those projects' environmental analysis. Thus, as the Project would not result in significant impacts to archaeological resources, the Project would not contribute considerably to cumulative archaeological resources impacts, and cumulative archaeological resources impacts would be less than significant.

Regarding impacts related to human remains, if human remains are discovered during construction of any related projects, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California State HSC Sections 7050.5-7055, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097, et seq. Therefore, with the implementation of regulatory requirements, cumulative impacts related to human remains would be less than significant.

Energy – As discussed in **Section 4.6, Energy**, of this IS/ND, the Project would result in a less-than-significant impact on energy resources and would adhere to all applicable energy conservation requirements. As with the Project, the related projects would be expected to adhere to applicable energy conservation requirements and implement energy conservation features, as needed, to minimize the inefficient use of energy in accordance with applicable regulations. Therefore, the Project and the related projects would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As such, the Project would not contribute considerably to cumulative energy impacts, cumulative energy impacts would be less than significant.

Geology and Soils – Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. As provided under **Section 4.7**, **Geology and Soils**, of this IS/ND, the Project's impacts would be less than significant. As with the Project, the related projects would address site-specific geologic hazards through the

implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, related projects would be subject to local, State, and federal regulations and standards for seismic safety.

Regarding paleontological resources, the Project would not involve any excavation. Although the Project would include minor ground-disturbing activities within the existing utility right-of-way adjacent to the Project Site for connections to existing utility infrastructure, the soils within the utility right-of-way have previously been disturbed. As such, the likelihood for paleontological resources to exist is low. As part of the environmental review processes for the related projects, it is expected that mitigation measures or City conditions of approval would be required to address the potential for uncovering of paleontological resources. Therefore, the Project would not contribute considerably to cumulative geology and soils impacts, and cumulative geology and soils impacts would be less than significant.

Greenhouse Gas Emissions – As analyzed in **Section 4.8**, **Greenhouse Gas Emissions**, of this IS/ND, the analysis of a project's GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the Project-level analysis in **Section 4.8**, **Greenhouse Gas Emissions**, of this IS/ND assessed the potential for the Project to contribute to the cumulative impact of global climate change. As analyzed above, the Project's impacts regarding GHG emissions would be less than significant. As such, the Project would not contribute considerably to cumulative GHG impacts, and cumulative GHG impacts would be less than significant.

Hazards and Hazardous Materials – Like the Project, many of the related projects would use, handle, store, and/or transport hazardous materials, such as ACM and/or LBP, or require demolition of structures containing such materials. Such related projects would be required to use, store, remove and/or transport all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, or handling of hazardous materials, and that their development would not result in the release of existing hazardous materials. Some of the related projects may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, each related project would be required to comply with existing federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators.

As with the Project, some of the related projects may include the use of hazardous materials within 0.25-mile of a school. However, related projects would be subject to environmental review to evaluate potential impacts from hazardous materials releases within 0.25-mile of a school, thereby reducing impacts to less than significant. None of the related projects are within two miles of an airport land use plan, thereby reducing impacts to less than significant.

Some of the related projects may involve temporary construction encroachments into adjacent sidewalks or roadways. However, any changes to access and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. All access and circulation plans

would be subject to review and approval by the BHFD and would be developed to meet City standards for emergency access. The related projects would be developed within the existing urban grid and would not require alterations to emergency access routes and would not contribute to cumulative effects in concert with the Project.

Related projects are all located in highly urbanized areas, would not contain wildland features, and are not located adjacent to any wildland areas. Therefore, development of related projects would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Therefore, the Project would not contribute considerably to cumulative hazards and hazardous materials impacts, and cumulative hazards and hazardous materials impacts would be less than significant.

Hydrology and Water Quality – Related projects would potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to the City's LID requirements. Additionally, construction projects greater than one acre would be subject to NPDES permit requirements, including development of a Stormwater Pollution Prevention Plan, Standard Urban Stormwater Mitigation Plan requirements during operation, and other local requirements pertaining to hydrology and surface water quality, and all construction projects would be required to prepare and implement an ESCP. As noted in **Section 4.10, Hydrology and Water Quality**, of this IS/ND, as the Project would include a greater square footage of planter boxes than existing conditions, development of the Project would improve surface water quality runoff compared to existing conditions. It is anticipated that related projects would also be evaluated on an individual basis by the City of Beverly Hills Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Thus, with implementation of standard regulatory requirements, Project impacts related to hydrology and water quality would not be cumulatively considerable, and cumulative impacts would be less than significant.

The Project is not proposed in a floodplain, would not impede or redirect flood flows, and would not be subject to inundation by 100-year flood flows, seiches or tsunamis. Therefore, the Project would not contribute considerably to cumulative hydrology and water quality impacts, and cumulative hydrology and water quality impacts would be less than significant.

Additionally, regarding groundwater quality, no water supply wells, groundwater recharge areas, or groundwater recharge facilities are located within or in the vicinity of the Project Site. Future growth in the Hollywood Groundwater Basin would be subject to requirements relating to groundwater quality. In addition, since the Project Site is located in a highly urbanized area, future land use changes or development are not likely to cause substantial changes in regional groundwater quality. As noted above, the Project does not have an adverse impact on groundwater quality. Also, it is anticipated that, like the Project, other future development projects would comply with all applicable laws, rules, and regulations, therefore cumulative impacts to groundwater quality would be less than significant.

Land Use and Planning – As discussed in **Section 4.11, Land Use and Planning**, of this IS/ND, upon approval of the proposed ZTA and GPA by the City, the Project would be substantially consistent with applicable land use plans, policies, and regulations, and would result in less than significant

land use and planning impacts. Specifically, the Project would not physically divide an established community, and would not cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As with the Project, related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur for the related projects, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Thus, cumulative land use impacts would be less than significant.

Mineral Resources – As substantiated in **Section 4.12, Mineral Resources**, of this IS/ND, the Project Site is not located in a MRZ or a mineral producing area such that the Project would not result in the loss of a locally significant mineral resource recovery site. Furthermore, no mineral resources or extraction operations for such resources occur within or in the vicinity of the Project Site, and the Project does not propose any mining or drilling activities. Therefore, the Project would not contribute considerably to cumulative mineral resources impacts, and cumulative mineral resources impacts would be less than significant.

Noise – As discussed in **Section 4.13, Noise**, of this IS/ND, potential noise impacts associated with construction and operation of the Project would be less than significant. The Project's potential vibration impacts with respect to human annoyance and potential building damage associated with construction activities and operation would also be less than significant. Additionally, the Project's potential groundborne noise impacts would be less than significant during construction and operation. Also, although the closest related projects are approximately 260 feet and 390 feet from the Project Site, as with the Project, all related projects would be required to comply with existing City noise regulations, and mitigate their noise impacts, if applicable. Therefore, the Project would not contribute considerably to cumulative noise impacts, and cumulative noise impacts would be less than significant.

Population and Housing – As discussed in **Section 4.14, Population and Housing**, of this IS/ND, the Project would not construct or displace residential units such that there would be no direct impacts to population and housing. While the Project would increase on-site employment, the Project is expected to hire employees from the local population and generally would not require relocation for such employment opportunities. As such, these increases would not be expected to cause a substantial number of new households to cause a substantial demand for new housing. Furthermore, the Project Site is already developed with urban uses, and the Project would not extend infrastructure to currently unserved areas and would not induce substantial population growth. Thus, as concluded in **Section 4.14, Population and Housing**, Project population and housing impacts would be less than significant. In addition, while the related projects could cumulatively increase population in the area, such increases would be expected to be within City and SCAG growth forecasts. The Project would contribute little if any to additional population growth in the area. Thus, the Project would not contribute considerably to cumulative population and housing impacts, and cumulative population and housing impacts would be less than significant.

Public Services – As discussed in **Section 4.15, Public Services**, of this IS/ND, the Project would meet City fire flow and emergency access requirements and CBC requirements related to fire protection. The Project would not result in a substantial increase in demand for BHFD facilities

and services and would not result in substantial traffic congestion which could slow emergency response. Therefore, Project impacts to fire protection would be less than significant. Like the Project, the related projects would be required to comply with applicable City fire protection requirements and fire safety plan review. In addition, consistent with the decision in *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal. App. 4th 833 and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), it is the City's obligation to provide adequate fire protection and emergency medical services. Through the City's regular budgeting efforts, BHFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. Therefore, the Project would not contribute considerably to cumulative fire protection impacts, and cumulative fire protection impacts would be less than significant.

Regarding police protection, the Project would not introduce a direct residential population typically associated with an increased demand for such services. During operations, both driveways of the parking garage that the Project Site is within would continue to be secured by existing parking barriers that require visitors to press a button for a ticket to enter the parking garage. The Project would also include security measures such as security lighting and a surveillance camera system. In addition, consistent with the decision in *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal. App. 4th 833 and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), it is the City's obligation to provide adequate public safety services. Through the City's regular budgeting efforts, BHPD's resource needs, including staffing, equipment, basic cars, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Therefore, the Project would not contribute considerably to cumulative police protection impacts, and cumulative police protection impacts would be less than significant.

As analyzed previously, the Project would not generate a direct residential population that could increase the demand for schools or libraries. In addition, any direct increase in the local residential population associated with the Project would be inconsequential. Therefore, the Project would not contribute considerably to any cumulative impacts to schools, libraries, or hospitals, and cumulative schools, libraries, and hospitals impacts would be less than significant.

Recreation – The Project does not include residential development, which typically creates a direct demand on park services. Additionally, any indirect increase in the local residential population with the Project would be inconsequential. The Project does not propose the demolition or addition of any open space. Thus, as discussed in **Section 4.16, Recreation,** of this IS/ND, no substantial new demand for parks and recreational facilities would occur. Moreover, related projects requiring discretionary approvals would be subject to CEQA review by the City which would address, in part, parks and recreational facilities service demand. Thus, the Project would not contribute considerably to cumulative parks and recreation impacts, and cumulative parks and recreation impacts would be less than significant.

Transportation – Similar to the Project, the related projects would be individually responsible for complying with relevant plans, programs, ordinances, or policies addressing the circulation system. In addition, similar to the Project, the related projects would be required to mitigate any conflicts with VMT reduction requirements, substantial hazards due to geometric features or

incompatible uses, and inadequate emergency access. Furthermore, as discussed in **Section 4.17, Transportation**, of this IS/ND, the Project would be consistent with existing applicable plans addressing circulation and would result in less-than-significant impacts associated with VMT, hazards due to design features or incompatible uses, and emergency access. Related projects would be required to implement transportation demand mitigation (TDM) measures, be required to comply with County's congestion management program, or implement mitigation measures as needed. Therefore, the Project would not contribute considerably to cumulative transportation impacts, and cumulative transportation impacts would be less than significant.

Tribal Cultural Resources –The majority of the related projects are located a substantial distance from the Project Site. In addition, the Project and several of the related projects are located on sites that are currently developed or have otherwise been disturbed. An SLF search conducted with the NAHC resulted in positive findings within the vicinity of the Project area, and the NAHC recommended further consultation with the Gabrieleño/Tongva San Gabriel Band of Mission Indians in accordance with AB 52 and SB 18. Furthermore, as discussed in **Section 4.18, Tribal Cultural Resources,** of this IS/ND, since no archaeological resources were identified within the Project Site as a result of the records search and associated research, it is unlikely that undisturbed archaeological resources are present within the Project Site given the extent of prior development. Additionally, the Project would involve only minimal ground-disturbing activities within the existing utility right-of-way adjacent to the Project Site for connection to utility infrastructure, and would not involve excavation or grading. As such, there is little potential for archaeological resources that meet the definition of "Historical Resources" or "Unique Archaeological Resources", as defined by CEQA, to be identified within the Project area as a result of the Archaeological Resources Assessment. Regarding the associated ZTA and GPA, the ZTA and GPA would only affect development within the Business Triangle, which also has been heavily disturbed and is entirely developed with commercial and office uses. Any related projects would similarly be subject to project-specific mitigation measures should it be determined that there be tribal cultural resources present. Furthermore, like the Project, the related projects would be required to comply with the consultation requirements of AB 52 and/or SB 18 to determine and mitigate any potential impacts to tribal cultural resources. Therefore, the Project would not contribute considerably to cumulative tribal cultural resources impacts, and cumulative tribal cultural resources impacts would be less than significant.

Utilities and Service System – Due to shared urban infrastructure, the Project and related projects would cumulatively increase water demand, wastewater generation, stormwater discharges, and energy and telecommunication service demand on the local water, sewer, stormwater drainage, and energy infrastructure. However, as discussed in **Section 4.19, Utilities and Service Systems**, of this IS/ND, sufficient infrastructure capacity is available to accommodate the Project. Additionally, as with the Project, related projects would be reviewed by the City to ensure that sufficient capacity is available or additional improvements are made to provide capacity prior to construction. Therefore, the Project would not contribute considerably to cumulative utilities and service system impacts, and cumulative impacts would be less than significant.

With regard to solid waste, the Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction and operation periods. However, with the implementation of solid waste policies and objectives intended to help

achieve the requirements of AB 939 and the City's 50-percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Moreover, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Project would not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.

Wildfire – As provided in **Section 4.20, Wildfire**, of this IS/ND, the Project is not located in or near a State Responsibility Area or lands classified as VHFHSZ. The Project would not substantially impair an adopted emergency response plan or emergency evacuation plan or expose people or structures to significant risks, including downslope or downstream flooding or landslides, after a fire. Thus, the Project would not contribute considerably to cumulative wildfire impacts, and cumulative wildfire impacts would be less than significant.

As the above analysis shows, due to the distance of most of the related projects from the Project Site and the physical conditions in the vicinity of the Project Site, the Project would not have impacts that are individually limited but cumulatively considerable. Additionally, as stated above in **Section 2.3.6, Proposed ZTA and GPA**, as the application of the ZTA and GPA to other potential sites within the Business Triangle is not reasonably foreseeable at this time, those projects, should it be submitted as a formal application to the City, would require a project-specific CEQA analysis at that time. Therefore, cumulative impacts would be less than significant.

4.21c Does the project have environmental effects which will cause substantial adverse effects on human beings, directly or indirectly?

Less Than Significant Impact. As discussed in the respective sections, the Project would have no potentially significant impacts that would not be reduced to less than significant following compliance with the established regulatory framework and/or conditions of approval for the Project. The Project would not cause substantial adverse effects on human beings directly or indirectly. Therefore, impacts concerning adverse effects on human beings would be less than significant.

Appendix A

Air Quality Analysis

Kimley»Horn

MEMORANDUM

To:	Minjee Hahm, AICP Associate Planner City of Beverly Hills
From:	Olivia Chan and Ciara Anderson
Date:	September 6, 2024
Subject:	450 North Roxbury Drive Project – Air Quality Analysis

Purpose

The purpose of this memorandum is to assess potential impacts due to air pollutant emissions associated with construction and operation of the 450 North Roxbury Drive Project (Project), proposed to be located in the City of Beverly Hills (City), California.

Project Location

The Project would redevelop a 6,797 square foot portion of the ground floor of a five-floor, partially subterranean parking garage (the upper two levels are above ground) with rooftop parking located on a 0.8-acre parcel (Assessor's Parcel Number [APN] 4343-024-020) (Project Site); see **Figure 1: Local Vicinity Map**. The five-floor parking garage is attached to a 10-story, 155-foot-tall office building located on the northern portion of the same parcel, constructed in 1970. The parking garage and office building together are considered the Project Site; however, the remainder of the parking garage and the attached office building would not be redeveloped as part of this Project. The Project Site is bound by Santa Monica Boulevard to the north, Bram Goldsmith Way (an alley) to the east, an existing commercial building to the south, and North Roxbury Drive to the west. The Project Site is in the southwestern portion of the City, in Los Angeles County (County), approximately 3.0 miles north of Culver City and 8.5 miles west of downtown Los Angeles; see **Figure 2: Regional Vicinity Map**.

Project Description

The Project would convert a portion of the ground level of the existing parking garage to approximately 6,797 square feet of retail uses, split into four retail spaces ranging from 1,397 square feet to 1,841 square feet. The retail spaces would be accessed from the North Roxbury Drive street frontage. Storefront facades would consist of louvers, cast-in-place (CIP) concrete, and storefront glazing, with signage installed on top. Approximately 300 square feet of planter area would also be added; see **Figure 3: Conceptual Site Plan**.

SOURCE: Google Earth, 2024

FIGURE 1: Local Vicinty Map

450 NORTH ROXBURY DRIVE PROJECT

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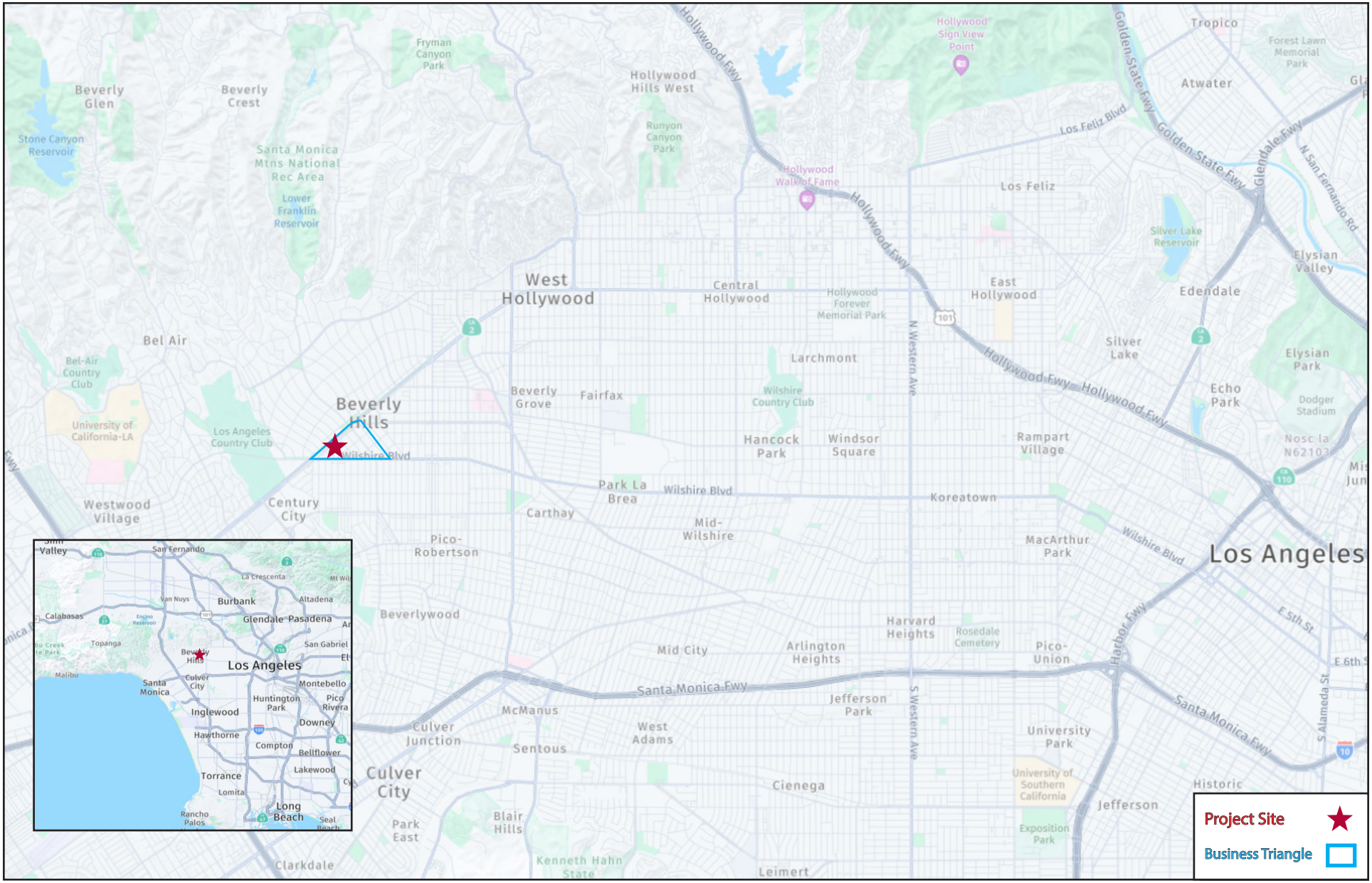

SOURCE: Nearmap, 2024

FIGURE 2: Regional Vicinty Map

450 NORTH ROXBURY DRIVE PROJECT

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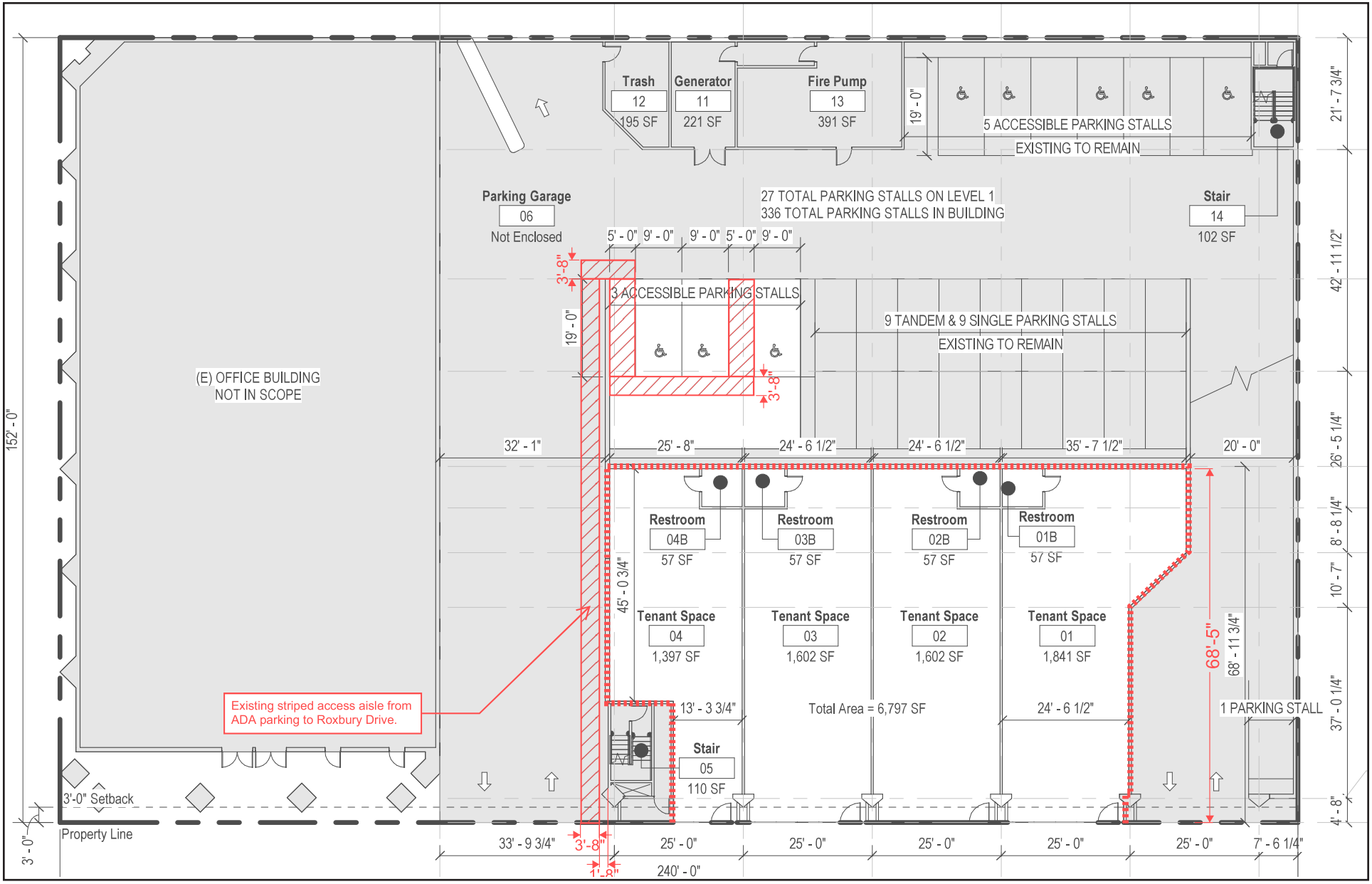

SOURCE: HLW International LLP, 2024

FIGURE 3: Conceptual Site Plan

450 NORTH ROXBURY DRIVE PROJECT

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The Applicant is requesting a Zone Text Amendment (ZTA) and General Plan Amendment (GPA) to allow an increase in the maximum FAR as a result of the conversion of the ground level of an existing parking structure abutting a public street to retail business(es), as defined in Beverly Hills Municipal Code (BHMC) Section 10-3-100, up to a depth of 70 feet from the front property line, subject to approval of a Development Plan Review pursuant to BHMC Section 10-3-3100.[1] In compliance with the proposed ZTA and GPA, the Project is proposing a conversion of 6,797 square feet of an existing parking structure, resulting in a new total of 103,647 square feet of proposed floor area. Pursuant to BHMC Section 10-3-2745, the maximum allowable floor area for the Project Site is 72,960 square feet. Therefore, the 6,797 square feet conversion is approximately 9.3 percent of the existing building square footage (96,850 square feet) and would be less than 10 percent of the maximum allowable floor area for the site.

The Project would remove 29 existing parking spaces (including 24 single parking spaces and 5 tandem parking spaces) on the ground floor and restripe the remaining ground level of parking to replace the 3 removed ADA spaces, which would be relocated to be adjacent to the northeastern end of the proposed retail spaces. Vehicular access to the Project Site would continue to be provided via the two existing in/out driveways on North Roxbury Drive. Pedestrian access would continue to be provided via the existing sidewalk along North Roxbury Drive. The Project would not modify the existing driveways and sidewalk.

A new mechanical split heating, ventilation, and air conditioning (HVAC) system would be installed above the ceilings of the retail spaces. A new rooftop HVAC unit would be provided immediately south of an existing HVAC unit on the rooftop of the parking garage. The Project would also install four 5-ton heat pump condensers along the western edge of the rooftop. An automated sprinkler system would also be installed within the retail spaces for fire protection purposes, including a fire pump on the eastern portion of the Project Site.

Project construction would include the demolition of existing building façade, flooring, and planters, building construction, and architectural coatings. Demolition activities would require the use of haul trucks. No grading or excavation will be required to construct this Project. Project construction is anticipated to begin as early as January 2025 and would be completed as early as February 2026. Construction of the Project is estimated to require approximately 14 months.

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[1] The ZTA and GPA would apply to the entire Business Triangle of the City; however, future projects that would seek to utilize the ZTA and GPA would be subject to environmental review at such time.

Air Quality Impacts

South Coast Air Quality Management District Thresholds

The South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange, Riverside, and San Bernardino Counties. The Project Site is located within the South Coast Air Basin, which is a distinct geographic subarea within SCAQMD's jurisdiction. The SCAQMD CEQA Air Quality Handbook provides significance thresholds for volatile organic compounds (VOC) (also referred to as reactive organic gases [ROG]), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter 10 microns or less in diameter (PM10), and particulate matter 2.5 microns or less in diameter (PM2.5). The thresholds apply to both project construction and operation within the SCAQMD jurisdictional boundaries. If the SCAQMD thresholds are exceeded, a potentially significant impact could result. However, ultimately the City, as the Lead Agency under CEQA, determines the thresholds of significance for impacts. If a project proposes development in excess of the established thresholds, as outlined in Table 1: South Coast Air Quality Management District Significance Thresholds, a significant air quality impact may occur, and additional analysis is warranted to fully assess the significance of impacts.

Table 1: South Coast Air Quality Management District Significance Thresholds

Pollutant	Mass Daily Thresholds (pounds per day)	
	Construction	Operations
Nitrogen Oxides (NO_X)	100	55
Volatile Organic Compounds (VOC)[1]	75	55
Particulate Matter up to 10 Microns (PM10)	150	150
Particulate Matter up to 2.5 Microns (PM2.5)	55	55
Sulphur Oxides (SO_X)	150	150
Carbon Monoxide (CO)	550	550

Notes:
1. VOCs and ROGs are subsets of organic gases that are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. Although they represent slightly different subsets of organic gases, they are used interchangeably for the purposes of this analysis.

Source: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, April 2019.

Local Air Quality

The SCAQMD maintains a network of air quality monitoring stations located throughout the South Coast Air Basin to measure ambient pollutant concentrations. The Project Site is located in SCAQMD Source Receptor Area (SRA) 2; therefore, the monitoring station most representative of the Project Site is the Northwest Coastal LA County Monitoring Station. Criteria pollutants monitored at this station include ozone, NO_2, and CO (through 2021). The Central LA Monitoring Station, east of the Project Site, was used to report data for CO (after 2021), SO_2, lead, PM10, and PM2.5. The most recent

pollutant concentration data available from the SCAQMD for these monitoring stations are from years 2021 to 2023, and are summarized in Table 2: Beverly Hills Ambient Air Quality Data.

Table 2: Beverly Hills Ambient Air Quality Data

Pollutant/Standard[1,2]	2021	2022	2023
O_3 (1-hour)			
Maximum Concentration (ppm)	0.095	0.081	0.109
Days > CAAQS (0.09 ppm)	1	0	1
O_3 (8-hour)			
Maximum Concentration (ppm)	0.082	0.070	0.066
4th High 8-hour Concentration (ppm)	0.059	0.058	0.064
Days > CAAQS (0.070 ppm)	1	0	0
Days > NAAQS (0.070 ppm)	1	0	0
NO_2 (1-hour)			
Maximum Concentration (ppm)	0.061	0.051	0.044
98th Percentile Concentration (ppm)	0.042	0.045	0.040
NO_2 (Annual)			
Annual Arithmetic Mean (0.030 ppm)	0.010	0.011	0.009
CO (1-hour)			
Maximum Concentration (ppm)	1.5	1.7	1.4
CO (8-hour)			
Maximum Concentration (ppm)	1.0	1.5	1.2
SO_2 (1-hour)			
Maximum Concentration (ppm)	0.002	0.007	0.008
99th Percentile Concentration (ppm)	0.002	0.002	0.002
SO_2 (24-hour)			
Maximum Concentration (ppm)	--	--	--
PM10 (24-hour)			
Maximum Concentration (µg/m^3)	64	60	57
Samples > CAAQS (50 µg/m^3)	3	4	2
Samples > NAAQS (150 µg/m^3)	0	0	0
PM10 (Annual Average)[3]			
Annual Arithmetic Mean (20 µg/m^3)	25.5	28.9	24.3
PM2.5 (24-hour)			
Maximum Concentration (µg/m^3)	61	33.7	30.6
98th Percentile Concentration (µg/m^3)	44.8	21.9	23.4
Samples > NAAQS (35 µg/m^3)	12	0	0
PM2.5 (Annual)[4]			
Annual Arithmetic Mean (12 µg/m^3)	12.77	10.94	10.25
Lead			
Maximum 30-day average (µg/m^3)	0.012	0.008	0.007

Table 2: Beverly Hills Ambient Air Quality Data			
Pollutant/Standard[1,2]	**2021**	**2022**	**2023**

Notes:
ppm = parts per million; µg/m³ = micrograms per cubic meter

1. The monitoring station most representative of the Project Site is Station number 91 in Northwest Costal LA County, which is used to establish ambient O_3, NO_2, and 2021 CO, levels. Since data for 2022/2023 CO, SO_2, lead, PM10 and PM2.5 are not monitored at this station, the Station in Central LA was used to report data for 2022/2023 CO, SO_2, lead, PM10, and PM2.5 The most recent data available from SCAQMD for these monitoring stations are from years 2021 to 2023.
2. The California Ambient Air Quality Standards (CAAQS) are based on a not to exceed standard. The National Ambient Air Quality Standards (NAAQS) are based on a 3-year average of the annual 4th highest daily maximum 8-hour concentration for O_3; 98th percentile of 1-hour daily maximum concentrations averaged over 3 years for 1-hr NO_2; and not to be exceeded more than once per year on average over 3 years for 24-hr PM.
3. State annual average (AAM) PM10 standard is > 20 µg/m³. Federal annual PM10 standard (AAM > 50 µg/m³) was revoked in 2006.
4. Both Federal and State standards are annual average (AAM) > 12.0 µg/m³.

Source: SCAQMD, Historical Data by Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year; CARB, Ambient Air Quality Standards, ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf. Accessed July 3, 2024.

City of Beverly Hills General Plan

The City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City's General Plan Land Use, Open Space, and Conservation Elements contain the following policies specific to air quality:

- **Land Use Policy LU 14.1** Accommodate a balanced mix of land uses and encourage development to be located and designed to enable residents access by walking, bicycling, or taking public transit to jobs, shopping, entertainment, services, and recreation, thereby reducing automobile use, energy consumption, air pollution, and greenhouse gases.
- **Land Use Policy LU 16.9** Require that private and public buildings be designed to promote public health by prohibiting the use of toxic building materials and high-VOC paints, providing adequate ventilation and access to natural lighting, and using "green building" techniques as required by the City's sustainability programs such as the Green Building Ordinance.
- **Open Space Policy OS 7.5** Coordinate with SCAQMD to ensure that projects incorporate feasible mitigation measures if those measures are not already provided for through project design.
- **Open Space Policy OS 7.7** Work with the South Coast Air Quality Management Board (SCAQMB) to meet state and federal ambient air quality standards.
- **Open Space Policy OS 7.8** Require new development projects that exceed the SCAQMB Reactive Organic Gases (ROG) and Nitrogen Oxides (NO_X) operational thresholds to incorporate design or operational features that reduce emissions equal to 15-percent from the level that would be produced by an unmitigated project.
- **Open Space Policy OS 7.11** Educate the public about air quality standards, health effects, and efforts that residents can make to improve air quality and reduce greenhouse gas emissions in the Los Angeles Basin.

- **Conservation Policy C 8.3** Continue to implement, as appropriate, the requirements of the NPDES and SCAQMD regulations, including requiring the use of Best Management Practices by businesses in the City.

City of Beverly Hills Sustainable City Plan

The Beverly Hills Sustainable City Plan establishes guiding principles and goals that the City uses to develop and implement programs that focus on sustainability. The following goal and policies are applicable to the Project:

Climate Change and Air Quality Goal: Combat climate change and improve air quality

- Policy 1: Minimize greenhouse gas and other emissions from City facilities and operations
- Policy 2: Minimize mobile source emissions from on- and off-road (construction) vehicles.
- Policy 3: Minimize stationary source air emissions
- Policy 4: Minimize particulate matter, both airborne photochemical precipitates and windborne dust.

Regional Construction Impacts

Construction associated with the proposed Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone-precursor pollutants (i.e., ROG and NO_X, PM10, and PM2.5). Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the amount of pollutants generated exceeds the SCAQMD's thresholds of significance. Sources of emissions during construction include motor vehicle exhaust associated with construction equipment and worker trips and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation grading activities as well as weather conditions and the appropriate application of water. However, the Project would not include site preparation or grading activities. Sensitive land uses surrounding the Project Site consist mostly of a church and residential communities located approximately 350 feet northwest of the Project Site.

The duration of construction activities for the Project is estimated to be approximately 14 months, beginning as early as January 2025 and ending as early as February 2026. The Project would convert existing parking area on the ground floor of an existing parking structure to retail uses and relocate three existing ADA parking spaces, resulting in a total construction area of approximately 0.16 acres.

Construction-generated emissions associated with the Project were calculated using the CARB-approved California Emissions Estimator Model (CalEEMod), which is designed to model emissions for land use development projects, based on typical construction requirements. See Appendix A: Air Quality Data for more information regarding the construction assumptions used in this analysis. Predicted maximum daily construction-generated emissions for the Project are identified in Table 3: Project Construction Emissions. The modeling emissions include truck idling time and emissions from heavy-duty diesel equipment.

Table 3: Project Construction Emissions						
Construction Year	**Emissions (pounds per day)[1]**					
	ROG	**NO_X**	**CO**	**SO_2**	**PM10**	**PM2.5**
2025	0.53	5.19	7.11	0.01	0.35	0.21
2026	3.27	4.86	7.04	0.01	0.23	0.18
Maximum Emissions	***3.27***	***5.19***	***7.11***	***0.01***	***0.35***	***0.21***
SCAQMD Threshold	75	100	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Emissions were calculated using the California Emissions Estimator Model (CalEEMod) version 2022.1, as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.

Source: CalEEMod version 2022.1. Refer to Appendix A for model outputs.

The Project is subject to SCAQMD Rules 402, 403, and 1113, which prohibit nuisances, require dust mitigation, and limit VOC content in paints, respectively. It has been assumed that these rules will be followed using watering the site and low VOC paints during construction. The results of the emissions modeling, as summarized on Table 3, show that construction criteria pollutant emissions would remain below the applicable thresholds, and construction impacts on short-term regional air quality would be less than significant.

Regional Operational Impacts

Operational emissions are typically associated with mobile sources (i.e., motor vehicle use) and area sources (such as the use of landscape maintenance equipment, hearths, consumer products, and architectural coatings). Energy source emissions would be generated from electricity and natural gas (non-hearth) usage. Table 4: Project Operational Emissions summarizes the operational emissions attributable to the Project. As shown in Table 4, the Project's regional operational emissions would not exceed applicable SCAQMD thresholds, and operational impacts on long-term regional air quality would be less than significant.

Table 4: Project Operational Emissions						
Source	**Emissions (pounds per day)[1]**					
	ROG	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Area	0.21	<0.005	0.30	<0.005	<0.005	<0.005
Energy	<0.005	0.01	0.01	<0.005	<0.005	<0.005
Mobile	1.16	0.83	8.58	0.02	1.78	0.46
Total	**1.37**	**0.84**	**8.88**	**0.02**	**1.78**	**0.46**
SCAQMD Threshold	55	55	550	150	150	55
SCAQMD Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
1. Emissions were calculated using the California Emissions Estimator Model (CalEEMod) version 2022.1, as recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.

Table 4: Project Operational Emissions						
Source	Emissions (pounds per day)[1]					
	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
2. Totals may not add up due to rounding.						
Source: CalEEMod version 2022.1. Refer to Appendix A for model outputs.						

Localized Construction Impacts

The nearest sensitive receptors to the Project Site are a church and community of single-family residences located approximately 350 feet (approximately 100 meters) to the northwest. To assess potential impacts to nearby sensitive receptors, the SCAQMD established Localized Significance Thresholds (LSTs). LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) to assist lead agencies in analyzing project-specific localized impacts.

CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment. However, the Project would not require any site preparation or grading activities. Therefore, because the Project disturbance area is less than one acre, the LSTs for a one acre site has been used in this construction analysis.

LSTs were established for NO_X, CO, PM10, and PM2.5, based on project size and local ambient air pollutant levels, as determined by SRA. For this Project, the appropriate SRA for LSTs is the Northwest Coastal LA County (SRA 2). Thus, the applicable LSTs for a 1.0 acre site in SRA 2 were used in this analysis.

SCAQMD's methodology indicates that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. The LSTs for 1.0 acre site with receptors at 100 meters were used for the construction analysis. Table 5: Localized Significance of Emissions presents the results of localized emissions modeling for construction activity. Emissions of these pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, construction impacts on regional air quality would be less than significant.

Localized Operational Impacts

According to the SCAQMD localized significance threshold methodology, LSTs apply to on-site sources. LSTs for receptors located at 100 meters for SRA 2 were conservatively used in this analysis. The 1.0-acre LST threshold was used for the Project Site. The operational emissions include all on-site Project-related stationary sources (i.e., area and energy sources). As shown on Table 5, the maximum daily emissions during operations would not exceed applicable LSTs, and are not expected to result in

significant concentrations of pollutants at nearby sensitive receptors. Therefore, operational impacts would be less than significant.

Table 5: Localized Significance of Emissions				
Source/Activity	**Emissions (pounds per day)[1]**			
	NO_X	**CO**	**PM10**	**PM2.5**
Construction Emissions				
Demolition 2025	4.3	5.6	0.2	0.2
Building Construction 2025	5.1	6.9	0.2	0.2
Building Construction 2026	4.8	6.9	0.2	0.2
Architectural Coating 2026	0.9	1.1	<0.1	<0.1
Maximum Daily Emissions	*5.1*	*6.9*	*0.2*	*0.2*
SCAQMD Localized Screening Threshold (1.0 acres of disturbance at 100 meters)	121	1,233	27	8
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Operational Emissions				
On-Site Emissions (Area + Energy Sources)	<0.1	0.3	<0.1	<0.1
SCAQMD Localized Screening Threshold (1.0 acres of disturbance at 100 meters)	121	1,233	7	2
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**

Notes:
1. Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A.

Source: CalEEMod version 2022.1. Refer to Appendix A for model data outputs.

Carbon Monoxide Hot Spots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service (LOS) of an intersection from Project-related traffic would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined in the South Coast Air Basin.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (AQMP). The Basin was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent AQMP that addresses CO concentrations. As

part of the SCAQMD CO Hotspot analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 parts per million (ppm), which is well below the 35 ppm federal standard. The Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's 2003 CO hot spot analysis as the Project would generate 370 net daily vehicle trips.[2] As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced in the Project vicinity. Therefore, impact on regional air quality would be less than significant.

AQMP Consistency

As part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under State law, the California Ambient Air Quality Standards (CAAQS) require an air quality attainment plan to be prepared for areas designated as nonattainment regarding the state and federal ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The Project is located within the South Coast Air Basin, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which the South Coast Air Basin is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP and 2022 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2022 AQMP builds upon measures already in place from previous AQMPs.[3] The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS). Air quality management planning is a regional and multi-agency effort including the SCAQMD, the CARB, the Southern California Association of Governments (SCAG), and the U.S. EPA. The AQMPs' pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's growth projections and the RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD's 2016 and 2022 AQMPs.

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[2] The Project's daily vehicle trips are based on Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition.

[3] South Coast Air Quality Management District, *2022 Air Quality Management Plan*, page ES-2, December 2022, http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan.

Criteria for determining consistency with the AQMPs are defined by the following indicators:

- **Consistency Criterion No. 1**: The Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs.
- **Consistency Criterion No. 2**: The Project will not exceed the assumptions in the AQMPs or increments based on the years of the Project build-out phase.

According to the SCAQMD's *CEQA Air Quality Handbook*, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus if it would interfere with the region's ability to comply with CAAQS and NAAQS.[4]

The violations to which Consistency Criterion No. 1 refers are exceedances of the CAAQS or NAAQS. As shown below, the Project would not exceed the construction or operational standards. Therefore, the Project would not result in an increase in frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs. Thus, the Project would be consistent with the AQMP under the first criterion.

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's growth forecasts included in the 2020-2045 RTP/SCS. SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans. The Project is consistent with the City of Beverly Hills General Plan land use designation for the Project Site and, therefore, the growth associated with the Project at the Project Site has been accounted for in SCAG's latest growth forecasts. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review.[5]

As shown below, the air pollutant emissions resulting from Project implementation would not exceed the SCAQMD localized significance thresholds. Localized significance thresholds were developed to ensure no exceedances of the California or federal ambient air quality standards would occur if project emissions were below thresholds.[6] As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_X, CO, SO_X, PM10, and PM2.5), the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, the Project would be consistent with employment growth projections in the AQMP.

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[4] South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

[5] Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176.

[6] South Coast Air Quality Management District, Localized Significance Thresholds, https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

Based on the above, approval of the Project would not result in any significant effects relating to a conflict with or obstruction of the implementation of the SCAQMD's AQMP.

Conclusion

Project implementation would result in less than significant construction and operational air quality impacts. No mitigation measures would be required.

Appendix A

CalEEMod Modeling Results

450 Roxbury Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	450 Roxbury
Construction Start Date	1/1/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	19.6
Location	450 N Roxbury Dr, Beverly Hills, CA 90210, USA
County	Los Angeles-South Coast
City	Beverly Hills
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4308
EDFZ	16
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.25

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Strip Mall	6.80	1000sqft	0.16	6,797	0.00	—	—	—
Other Asphalt Surfaces	0.07	1000sqft	< 0.005	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.63	0.53	5.19	7.11	0.01	0.22	0.04	0.26	0.20	0.01	0.21	—	1,370	1,370	0.06	0.02	0.21	1,377
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.30	3.27	5.19	7.09	0.01	0.22	0.19	0.35	0.20	0.04	0.21	—	1,369	1,369	0.06	0.02	0.02	1,375
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.45	0.38	3.67	5.03	0.01	0.15	0.04	0.19	0.14	0.01	0.15	—	960	960	0.04	0.01	0.07	964
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.08	0.07	0.67	0.92	< 0.005	0.03	0.01	0.03	0.03	< 0.005	0.03	—	159	159	0.01	< 0.005	0.01	160

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.63	0.53	5.19	7.11	0.01	0.22	0.04	0.26	0.20	0.01	0.21	—	1,370	1,370	0.06	0.02	0.21	1,377
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.63	0.53	5.19	7.09	0.01	0.22	0.19	0.35	0.20	0.04	0.21	—	1,369	1,369	0.06	0.02	0.02	1,375
2026	3.30	3.27	4.86	7.04	0.01	0.19	0.04	0.23	0.17	0.01	0.18	—	1,367	1,367	0.06	0.02	0.01	1,373
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.45	0.38	3.67	5.03	0.01	0.15	0.04	0.19	0.14	0.01	0.15	—	960	960	0.04	0.01	0.07	964
2026	0.22	0.21	0.34	0.49	< 0.005	0.01	< 0.005	0.02	0.01	< 0.005	0.01	—	90.6	90.6	< 0.005	< 0.005	0.01	91.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.08	0.07	0.67	0.92	< 0.005	0.03	0.01	0.03	0.03	< 0.005	0.03	—	159	159	0.01	< 0.005	0.01	160
2026	0.04	0.04	0.06	0.09	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	15.0	15.0	< 0.005	< 0.005	< 0.005	15.1

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.47	1.37	0.77	8.88	0.02	0.01	1.77	1.78	0.01	0.45	0.46	4.81	2,059	2,064	0.60	0.09	6.67	2,111
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.41	1.30	0.84	8.03	0.02	0.01	1.77	1.78	0.01	0.45	0.46	4.81	1,976	1,981	0.60	0.09	0.21	2,023

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.43	1.33	0.85	8.42	0.02	0.01	1.75	1.76	0.01	0.44	0.46	4.81	1,999	2,003	0.60	0.09	2.90	2,048
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.26	0.24	0.15	1.54	< 0.005	< 0.005	0.32	0.32	< 0.005	0.08	0.08	0.80	331	332	0.10	0.01	0.48	339

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.26	1.16	0.76	8.58	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,979	1,979	0.11	0.08	6.63	2,013
Area	0.22	0.21	< 0.005	0.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.22	1.22	< 0.005	< 0.005	—	1.22
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	74.9	74.9	0.01	< 0.005	—	75.3
Water	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Waste	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	1.47	1.37	0.77	8.88	0.02	0.01	1.77	1.78	0.01	0.45	0.46	4.81	2,059	2,064	0.60	0.09	6.67	2,111
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.24	1.14	0.83	8.03	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,898	1,898	0.11	0.09	0.17	1,926
Area	0.16	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	74.9	74.9	0.01	< 0.005	—	75.3
Water	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Waste	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04

Total	1.41	1.30	0.84	8.03	0.02	0.01	1.77	1.78	0.01	0.45	0.46	4.81	1,976	1,981	0.60	0.09	0.21	2,023
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.23	1.13	0.84	8.21	0.02	0.01	1.75	1.76	0.01	0.44	0.46	—	1,920	1,920	0.11	0.09	2.86	1,951
Area	0.20	0.20	< 0.005	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.83	0.83	< 0.005	< 0.005	—	0.84
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	74.9	74.9	0.01	< 0.005	—	75.3
Water	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Waste	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	1.43	1.33	0.85	8.42	0.02	0.01	1.75	1.76	0.01	0.44	0.46	4.81	1,999	2,003	0.60	0.09	2.90	2,048
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.23	0.21	0.15	1.50	< 0.005	< 0.005	0.32	0.32	< 0.005	0.08	0.08	—	318	318	0.02	0.01	0.47	323
Area	0.04	0.04	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.14	0.14	< 0.005	< 0.005	—	0.14
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.4	12.4	< 0.005	< 0.005	—	12.5
Water	—	—	—	—	—	—	—	—	—	—	—	0.16	0.54	0.70	0.02	< 0.005	—	1.23
Waste	—	—	—	—	—	—	—	—	—	—	—	0.64	0.00	0.64	0.06	0.00	—	2.23
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	0.26	0.24	0.15	1.54	< 0.005	< 0.005	0.32	0.32	< 0.005	0.08	0.08	0.80	331	332	0.10	0.01	0.48	339

3. Construction Emissions Details

3.1. Demolition (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.56	0.47	4.33	5.65	0.01	0.16	—	0.16	0.14	—	0.14	—	852	852	0.03	0.01	—	855
Demolition	—	—	—	—	—	—	0.05	0.05	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.27	0.36	< 0.005	0.01	—	0.01	0.01	—	0.01	—	53.7	53.7	< 0.005	< 0.005	—	53.9
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.89	8.89	< 0.005	< 0.005	—	8.92
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.05	0.59	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	131	131	0.01	< 0.005	0.01	133
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.2	42.2	< 0.005	0.01	< 0.005	44.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.38	8.38	< 0.005	< 0.005	0.01	8.49
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.66	2.66	< 0.005	< 0.005	< 0.005	2.79
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.39	1.39	< 0.005	< 0.005	< 0.005	1.41
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.44	0.44	< 0.005	< 0.005	< 0.005	0.46

3.3. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	5.14	6.94	0.01	0.22	—	0.22	0.20	—	0.20	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	5.14	6.94	0.01	0.22	—	0.22	0.20	—	0.20	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.40	0.34	3.36	4.54	0.01	0.14	—	0.14	0.13	—	0.13	—	853	853	0.03	0.01	—	856
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.61	0.83	< 0.005	0.03	—	0.03	0.02	—	0.02	—	141	141	0.01	< 0.005	—	142
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.15	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	30.1	30.1	< 0.005	< 0.005	0.11	30.5
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.3	35.3	< 0.005	< 0.005	0.10	37.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.5	28.5	< 0.005	< 0.005	< 0.005	28.9
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.4	35.4	< 0.005	< 0.005	< 0.005	36.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	18.9	18.9	< 0.005	< 0.005	0.03	19.2
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	23.1	23.1	< 0.005	< 0.005	0.03	24.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.13	3.13	< 0.005	< 0.005	0.01	3.17
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.83	3.83	< 0.005	< 0.005	< 0.005	3.99
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.29	0.42	< 0.005	0.01	—	0.01	0.01	—	0.01	—	79.1	79.1	< 0.005	< 0.005	—	79.4
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.1	13.1	< 0.005	< 0.005	—	13.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	0.01	0.01	0.12	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	27.9	27.9	< 0.005	< 0.005	< 0.005	28.3
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	34.7	34.7	< 0.005	< 0.005	< 0.005	36.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.72	1.72	< 0.005	< 0.005	< 0.005	1.74
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.11	2.11	< 0.005	< 0.005	< 0.005	2.20
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.29
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.35	0.35	< 0.005	< 0.005	< 0.005	0.36
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.15	3.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architectural Coatings	0.17	0.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.59	5.59	< 0.005	< 0.005	< 0.005	5.66
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.31
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	1.26	1.16	0.76	8.58	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,979	1,979	0.11	0.08	6.63	2,013
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.26	1.16	0.76	8.58	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,979	1,979	0.11	0.08	6.63	2,013
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	1.24	1.14	0.83	8.03	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,898	1,898	0.11	0.09	0.17	1,926
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.24	1.14	0.83	8.03	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,898	1,898	0.11	0.09	0.17	1,926
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	0.23	0.21	0.15	1.50	< 0.005	< 0.005	0.32	0.32	< 0.005	0.08	0.08	—	318	318	0.02	0.01	0.47	323

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.23	0.21	0.15	1.50	< 0.005	< 0.005	0.32	0.32	< 0.005	0.08	0.08	—	318	318	0.02	0.01	0.47	323

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	64.2	64.2	0.01	< 0.005	—	64.6
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	64.2	64.2	0.01	< 0.005	—	64.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	64.2	64.2	0.01	< 0.005	—	64.6
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	64.2	64.2	0.01	< 0.005	—	64.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	10.6	10.6	< 0.005	< 0.005	—	10.7
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Total	—	—	—	—	—	—	—	—	—	—	—	—	10.6	10.6	< 0.005	< 0.005	—	10.7

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.78	1.78	< 0.005	< 0.005	—	1.78
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.78	1.78	< 0.005	< 0.005	—	1.78

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.15	0.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	0.05	< 0.005	0.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.22	1.22	< 0.005	< 0.005	—	1.22
Total	0.22	0.21	< 0.005	0.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.22	1.22	< 0.005	< 0.005	—	1.22
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.15	0.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.16	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landsca Equipment	0.01	0.01	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.14	0.14	< 0.005	< 0.005	—	0.14
Total	0.04	0.04	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.14	0.14	< 0.005	< 0.005	—	0.14

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.16	0.54	0.70	0.02	< 0.005	—	1.23
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.16	0.54	0.70	0.02	< 0.005	—	1.23

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.64	0.00	0.64	0.06	0.00	—	2.23
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.64	0.00	0.64	0.06	0.00	—	2.23

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2025	1/31/2025	5.00	23.0	—
Building Construction	Building Construction	2/1/2025	1/31/2026	5.00	260	—

Architectural Coating	Architectural Coating	2/1/2026	3/1/2026	5.00	20.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	6.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	10.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	0.61	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	2.18	18.5	LDA,LDT1,LDT2

Building Construction	Vendor	1.11	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	0.44	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	10,196	3,399	4.50

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	56.0	—

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Strip Mall	0.00	0%
Other Asphalt Surfaces	< 0.005	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	532	0.03	< 0.005
2026	0.00	532	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Strip Mall	370	370	370	135,085	2,495	2,495	2,495	910,843
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

0	0.00	10,196	3,399	4.50

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Strip Mall	67,675	346	0.0330	0.0040	33,469
Other Asphalt Surfaces	0.00	346	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Strip Mall	503,471	0.00
Other Asphalt Surfaces	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Strip Mall	7.14	—

Other Asphalt Surfaces	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	7.73	annual days of extreme heat
Extreme Precipitation	7.05	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth

Wildfire	0.30	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2

Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	58.2
AQ-PM	69.7
AQ-DPM	73.3
Drinking Water	49.6
Lead Risk Housing	26.7
Pesticides	0.00
Toxic Releases	74.0
Traffic	60.7

Effect Indicators	—
CleanUp Sites	80.3
Groundwater	22.1
Haz Waste Facilities/Generators	66.6
Impaired Water Bodies	0.00
Solid Waste	93.7
Sensitive Population	—
Asthma	4.45
Cardio-vascular	18.3
Low Birth Weights	3.40
Socioeconomic Factor Indicators	—
Education	25.9
Housing	87.0
Linguistic	87.0
Poverty	33.8
Unemployment	70.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	68.24072886
Employed	40.65186706
Median HI	72.46246632
Education	—
Bachelor's or higher	74.51559091
High school enrollment	4.709354549

Preschool enrollment	67.02168613
Transportation	—
Auto Access	11.40767355
Active commuting	55.1777236
Social	—
2-parent households	85.42281535
Voting	30.52739638
Neighborhood	—
Alcohol availability	22.08392147
Park access	17.55421532
Retail density	98.83228538
Supermarket access	87.86090081
Tree canopy	61.15744899
Housing	—
Homeownership	17.77235981
Housing habitability	14.69267291
Low-inc homeowner severe housing cost burden	3.464647761
Low-inc renter severe housing cost burden	49.04401386
Uncrowded housing	62.10701912
Health Outcomes	—
Insured adults	74.51559091
Arthritis	0.0
Asthma ER Admissions	95.8
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0

Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	92.8
Cognitively Disabled	20.1
Physically Disabled	5.6
Heart Attack ER Admissions	85.8
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	68.9
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	90.2
Elderly	3.7
English Speaking	10.3
Foreign-born	93.1
Outdoor Workers	95.0
Climate Change Adaptive Capacity	—
Impervious Surface Cover	17.3
Traffic Density	77.2

Traffic Access	87.4
Other Indices	—
Hardship	42.9
Other Decision Support	—
2016 Voting	29.1

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	44.0
Healthy Places Index Score for Project Location (b)	49.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	No site prep, grading, or paving; using provided construction total length of 14 months
Operations: Vehicle Data	Based on project trip generation

Appendix B

Historic Resources Assessment and Peer Review

Kimley»Horn

450 N. Roxbury Drive

Historical Resource Assessment and Project Impacts Analysis

Prepared for:

Glaser Weil

Prepared by:

Architectural Resources Group

Architectural Resources Group
Los Angeles, CA

April 23, 2024

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1. Introduction

1.1 Executive Summary

At the request of Glaser Weil, Architectural Resources Group (ARG) has prepared this Historical Resource Assessment and Project Impacts Analysis for the proposed project ("the Project") located at 450 N. Roxbury Drive (APN: 4343-024-020), Beverly Hills, California. The Project Site (or "the Site") is developed with a high-rise office building and attached parking garage. Constructed in 1970, the building and parking garage were originally owned and occupied by Kaplan, Livingston, Goodwin, Berkowitz, and Selvin, a now-defunct entertainment law firm. The property is currently owned by Starpoint Properties.

The office building and attached parking garage are not formally designated under federal (National Register of Historic Places), state (California Register of Historical Resources), or local (Beverly Hills Historic Preservation Ordinance) registration criteria. Furthermore, they do not appear to have been identified in the Beverly Hills Historic Resources Survey (Johnson Heumann Research Associates, 1985-1986), the Historic Resources Survey Update of Survey Area 5: Commercial Properties (Jones & Stokes, 2006-2007), or any other historic resource evaluation or survey. The property is not listed in California's Built Environment Resource Directory (BERD).

In a Beverly Hills Architectural Commission Report prepared by City Planning staff on April 17, 2019, the subject property is noted as a potentially eligible historic resource. The report states that "The building appears to be an eligible historic resource as a potential contributor to an eligible post-war historic commercial district…"[1] The report does not provide information related to the boundaries of the district, when or how the district was identified, or under which registration criteria or level of significance (National Register, California Register, Beverly Hills Register) the district is eligible for designation.

The Project includes the rehabilitation of a portion of the parking garage for use as retail space. Four retail storefronts totaling approximately 6,797 square feet would be added in the south half of the ground floor level of the parking garage. Four of the garage bays would be altered to accommodate four glazed storefront assemblies fronting Roxbury Drive. Vehicular entries/exits at the east and west ends of the garage would be retained, as would parking spaces in the north half of the ground floor level, the two below-ground levels, the second floor above-ground level, and the roof level. See *Section 6.3* for a more detailed description of the Project.

The purpose of this report is to fulfill the requirements of the California Environmental Quality Act (CEQA) as they relate to historical resources. CEQA states that "a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."[2] An evaluation of potential impacts under CEQA includes both a determination of whether, and the extent to which, historical resources as defined by CEQA are present on and adjacent to the Site and, if so, the identification of potential impacts to historical resources caused by the Project.

Upon more in depth, property-specific research conducted in preparation for this HRA, it is ARG's professional opinion that the property at 450 N. Roxbury Drive is not eligible for listing in the National

[1] City of Beverly Hills Planning Division, Beverly Hills Architectural Commission Report: 450 North Roxbury Drive, April 17, 2019.
[2] California Public Resources Code, Section 21084.1.

Register, California Register, or Beverly Hills Local Register of Historic Properties. However, given the 2019 staff report finding that the property is a potential contributor to an eligible postwar commercial historic district, ARG is conservatively treating the district as a historical resource under the California Environmental Quality Act (CEQA).

Thus, ARG conducted an analysis of the Project and evaluated its potential to impact historical resources. ARG finds that the Project would not have a significant impact on historical resources, or the subject property's potential eligibility as a district contributor.

1.2 Methodology

For the preparation of this report, ARG performed the following tasks for research, documentation, and analysis:

- Visited the site on February 7, 2024 to assess existing conditions and document the property's exterior and first floor lobby with digital photographs;
- Reviewed state and local technical bulletins, ordinances, and other materials related to the evaluation of historical resources;
- Conducted primary and secondary source research related to the history of the building;
- Developed applicable historic contexts and themes; and
- Evaluated the property against eligibility criteria of the National Register, California Register, and the City of Beverly Hills Historic Preservation Ordinance.
- Reviewed the Project and evaluated its potential to impact historical resources under CEQA.

ARG staff consulted the following archives and repositories as part of our research for this assessment: the Los Angeles Public Library; the archives of the *Los Angeles Times* and other local periodicals; drawings and building permits obtained from the City of Beverly Hills's Community Development Department; online repositories; and ARG's in-house collection of architectural books and reference materials. A complete list of sources is included at the end of this report.

1.3 Preparer Qualifications

This report was prepared by Katie Horak, Principal; Evanne St. Charles, Senior Associate; and Sydney Landers, all of whom meet the *Secretary of the Interior's Professional Qualifications Standards*, 36 CFR Part 61, in the discipline of Architectural History.[3]

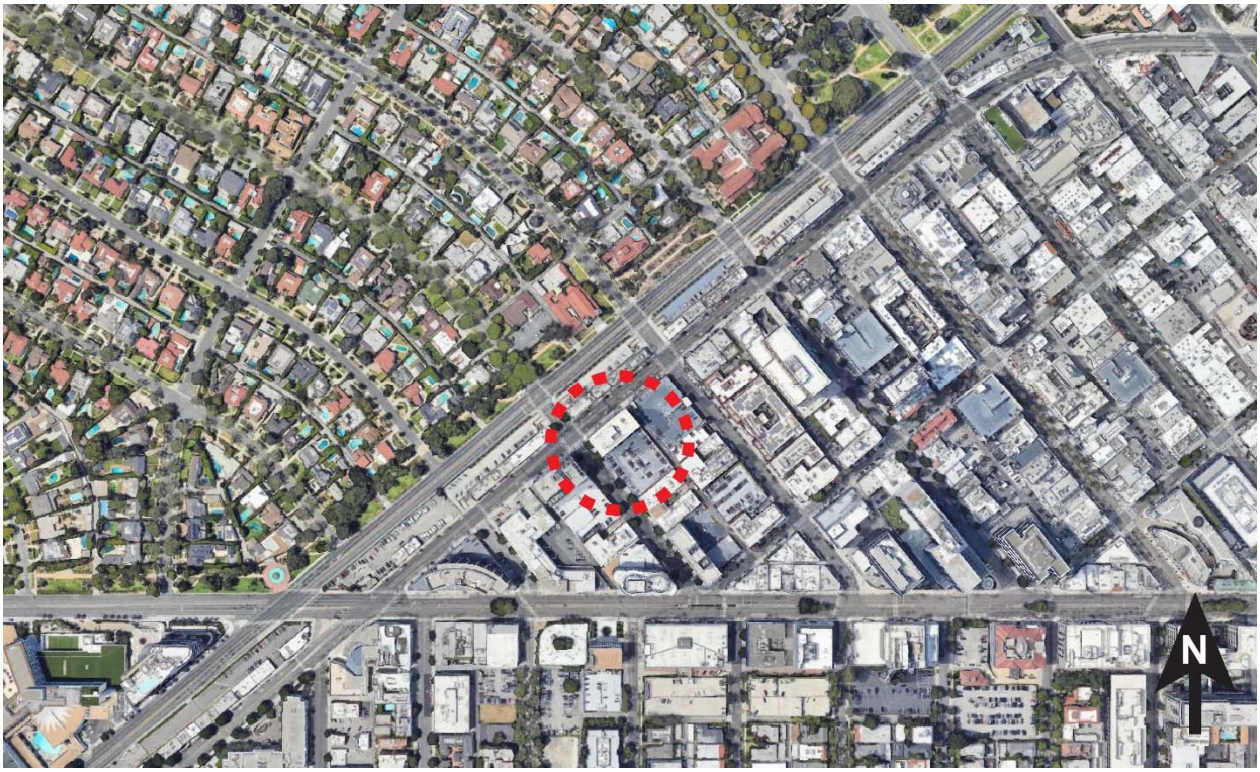
[3] National Park Service, "Professional Qualifications Standards," accessed February 2024, https://www.nps.gov/articles/sec-standards-prof-quals.htm.

2. Property Description and Development

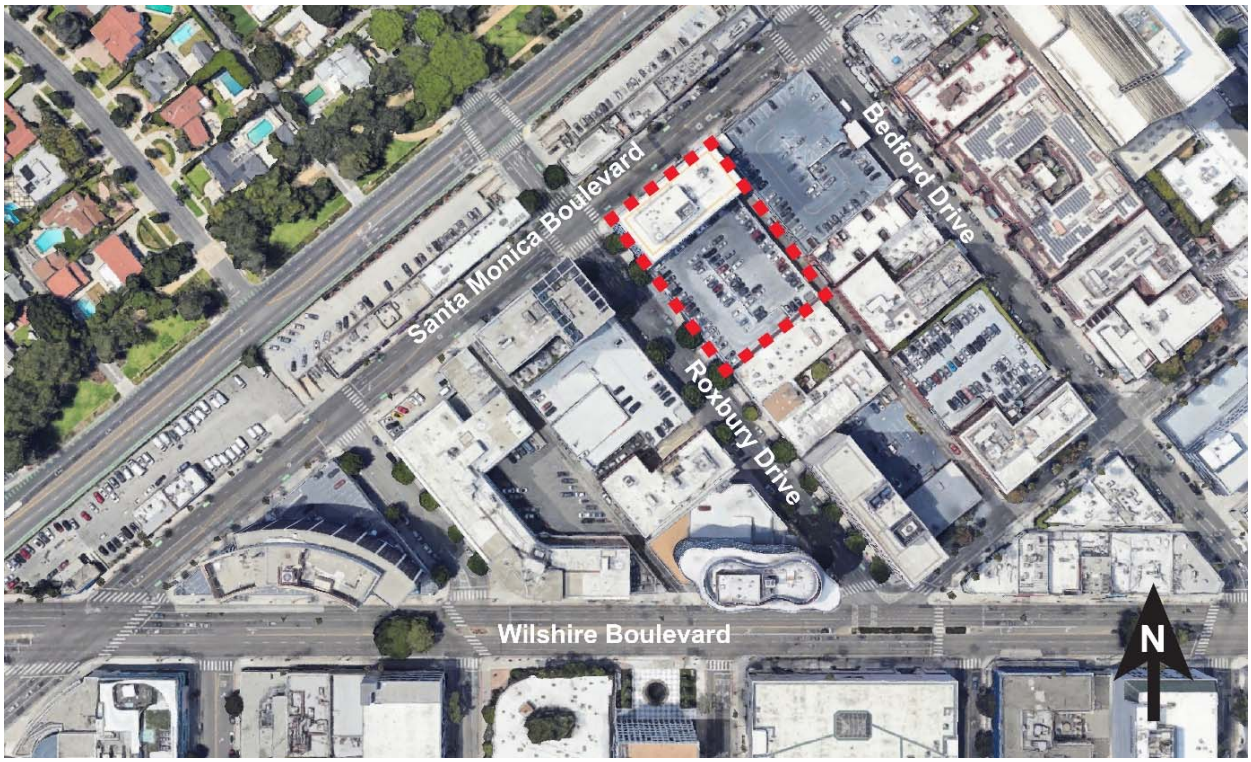
2.1 General Setting

The property at 450 N. Roxbury is located two blocks or so northeast of the intersection of Wilshire and Santa Monica boulevards, in the main commercial shopping district of Beverly Hills (known as the "commercial triangle" or "golden triangle"). Development in the vicinity consists of low-scale restaurant, retail, and office buildings, along with a handful of large hotel and office towers, primarily situated along Santa Monica and Wilshire. Blocks to the north of Santa Monica Boulevard are residential in character and generally lower in scale. The surrounding grid pattern is skewed at a 45-degree angle to the cardinal directions, and the topography is flat.

The subject property consists of a rectangular parcel at the southeast corner of Santa Monica Boulevard and North Roxbury Drive. An alley (Bram Goldsmith Way) borders the parcel to the east, and another commercial building is located directly to the south.



General location map. The general location of the subject property is delineated by a dashed red line (Google Maps, 2024; annotations by ARG).



Parcel map. The boundaries of the subject property are delineated by a dashed red line (Google Maps, 2024; annotations by ARG).

2.2 Office Building

The subject property contains a ten-story mixed-use office building, with retail tenants on the ground floor and office and medical suites on the rest of the floors. A five-level, partially subterranean parking structure (the upper two levels are above ground) with rooftop parking is attached to the south side of the building. The building was constructed in 1970 and represents a modest and late interpretation of the Corporate International style. It is rectangular in plan and sits flush with the sidewalk on its street-facing sides. Both the building and parking structure are constructed of steel framing with concrete foundations. The building is capped by a flat roof with a flat parapet. A plaster-enclosed mechanical penthouse sits at the center of the roof. Exterior walls are painted concrete. The building features a rhythmic pattern of rectangular solar tinted, fixed windows divided by triangular pilasters starting at the second floor. Concrete spandrel panels separate the windows between each floor, and a wide concrete frieze wraps around the building, dividing the first/ground story from the upper stories. The second through tenth floors are identical at all façades.

The primary façade of the building faces west, toward North Roxbury Drive, and is symmetrical in composition (aside from the retail storefronts on the first/ground story). The façade's double-height ground story is recessed behind four thick triangular columns and features a central entrance accessed by non-original limestone paving and steps with steel handrails (original paving and steps were terrazzo).[4] An non-original accessible ramp is directly to the north of the entrance. The main entrance comprises a pair of non-original clear tempered glass double doors framed by fixed clear glazing above and on each side (original doors and surrounding glazing had dark aluminum frames). On each side of the entrance are

[4] Limestone pavers and steel handrails were installed in 2006, according to specifications in the City of Beverly Hills Department of Community Development, Architectural Commission, Staff Report No. PL0606936.

floor-to-ceiling fixed windows with dark aluminum frames. The windows to the south of the entry have narrower mullions and appear to be replacements. A single metal slab door sits at the south end of the façade. Identical rows of fixed windows delineated by triangular pilasters line the upper stories.

The north façade fronts Santa Monica Boulevard. The façade's double-height ground story features seven bays divided by thick triangular columns. Two bays at the east end are clad in marble panels. The middle four bays are composed of fixed floor-to-ceiling windows with dark aluminum frames (some windows appear to be replacements given their thinner mullion profiles). The bay at the west end is composed of a non-historic bank storefront with fully glazed metal double doors and surrounding glazing. The second through tenth floors of the north façade are identical to the west, east, and south façades.

The building's rear (east) façade fronts an alley (Bram Goldsmith Way). The ground story is clad in concrete panels with a single vent and fire exit opening at the south end. The south end directly abuts the parking structure's rear vehicular exit. The upper stories are nearly identical to the west and north façades, with the exception being that windows are triple rather than single light.

The ground story of the south façade directly abuts the parking structure and is obscured from the exterior. The second through tenth floors are identical in motif to the west, north, and east façades. There are a handful of ventilation louvers that have been added to second and fifth floor window openings.

2.3 Parking Garage

The office building's parking structure is two stories in height, with two levels of below-ground parking. The structure's primary (west) façade fronts North Roxbury Drive. It is capped by a flat roof with a flat parapet wall concealing rooftop parking. The façade features two vehicular openings on the north and south ends. Both openings are accessed by curb cuts. The north end opening is double height and features entry and exit lanes, divided by a concrete median and parking barrier gates. The south end opening is single height with the upper level concealed by an aluminum screen featuring a vertically oriented, decorative diamond pattern (described as a "dragon" pattern on original drawings). A small, punched opening is located at the top corner of the screen. The south vehicular opening is divided by a concrete column and parking barrier gates between the entry and exit lanes. Four bays sit between the north and south vehicular entrances and are clad in aluminum screens with the same diamond pattern as seen over the south entry. Canted concrete planters sit at the base of each bay. Rectangular trellises covered in vines are installed in the planters in front of the aluminum screens. The bay abutting the north end opening includes a single metal slab door with a cut into the planter for accessibility. There is another canted concrete planter at the south end of the structure.

The rear (east) façade fronts an alley. The façade features two openings, a large vehicular opening at the north end and a pedestrian entrance to the south of the vehicular opening (the pedestrian entrance replaced a smaller screened rectangular opening at an unknown date). The vehicular opening is double height and features one lane for exiting, denoted by a concrete median and parking barrier gate. The pedestrian entrance is recessed and has two concrete steps accompanied by a metal railing. Original screened openings to each side of the pedestrian entrance have been infilled with concrete panels and metal vents. The rest of the façade is composed of two rows of square openings enclosed with decorative aluminum screens, akin to the screens on the primary (west) façade, but smaller. The north side of the

parking garage is attached to the office building. The south façade faces an adjacent commercial building and is devoid of fenestration.

Existing Conditions Photographs

North and primary (west) façades, view east (ARG, 2024).

Primary (west) and upper levels of the south façade, view north (ARG, 2024).

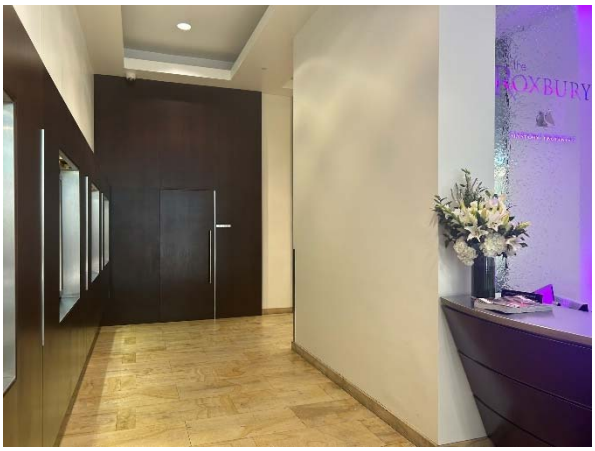
Rear (east) façade from the alley (ARG, 2024).

Bank storefront at west end of north façade, view southeast (ARG, 2024).

North façade first floor, marble panel bays at east end, view southeast (ARG, 2024).

Primary façade, close-up of main entrance (ARG, 2024).

View east into the first floor main lobby (ARG, 2024).



Interior detail of the first floor main lobby (ARG, 2024).

Primary (west) façade of the parking structure, view southeast (ARG, 2024).

Primary façade of the parking structure, detail, view northeast (ARG, 2024).

Primary (west) façade of parking structure, south entrance/exit, view southeast (ARG, 2024).

Rear (east) façade of the parking structure, view northwest (ARG, 2024).

2.4 Chronology of Development and Use

The following is a chronology of development and use of the property. Source materials include online building permits from the City of Beverly Hills Community Development Department, historic newspaper articles, and historic photographs.

1969	A permit was pulled for the construction of a 10-story office building. The original building permit lists the owner as the entertainment law firm Kaplan, Livingston, Goodwin, Berkowitz, and Selvin.[5] Sheldon L. Pollack Co. is listed as builder and engineer, with staff architect Norbert W. Pieper responsible for the design.[6] A second permit was issued for the construction of a "garage above and below street levels" to the south of the office building that can hold 382 cars.[7] The permits lists the same owner, architect, engineer, and contractor.[8]
1970	Newspapers suggest that the building was substantially completed and occupied by 1970. Most building inspections were signed off by late 1970, with large TI permits being issued from 1970 until 1972.[9]
Early 1970s	Based on early permit records and historic newspapers, the building's early major occupants included Kaplan, Livingston, Goodwin, Berkowitz, and Selvin (building owner); the oil and gas law firm Ball, Hart, Hunt, Brown & Baerwitz; and Merrill Lynch; and Time, Inc (*Time* magazine).[10] Other original tenants included law, realty, and financial companies.
1970s-present	The building has undergone numerous phases of interior tenant improvements on all floors, beginning in the 1970s. Some interior spaces have also undergone change of use from office to medical.[11]
1979	A permit was issued for minor structural demolition work at the roof level of the parking structure.[12]
1983	A permit was issued for reroofing of the building.[13] A permit was issued to construct a storage room in the parking structure, eliminating two parking spaces.[14]

[5] City of Beverly Hills Department of Building & Safety Permit No. 690137.
[6] Sheldon L. Pollack Corp, "Office Building for Kaplan, Livingston, Goodwin, Berkowitz & Selvin," Original Drawing Set from Permit No. 690137, 1969.
[7] "$8.3 Million Placed on Three Buildings," *Los Angeles Times*, April 9, 1972, 152.
[8] City of Beverly Hills Department of Building & Safety Permit No. 8320.
[9] City of Beverly Hills Department of Building & Safety, various permits; Merrill Lynch advertisement, *Los Angeles Times*, October 5, 1970.
[10] City of Beverly Hills Department of Building & Safety Permit No. 441051, 439760 and 700505; "Our business is to help people make their money grow," *Los Angeles Times*, June 24, 1970, 60.
[11] City of Beverly Hills Department of Building & Safety, various permits.
[12] City of Beverly Hills Department of Building & Safety Permit No. 693361.
[13] City of Beverly Hills Department of Building & Safety Permit No. 831204.
[14] City of Beverly Hills Department of Building & Safety Permit No. 830765.

1984	Kaplan, Livingston, Goodwin, Berkowitz, and Selvin sold the building to Beverly Hills Federal Savings & Loan for $20 Million.[15]
1985	Beverly Hills Federal Savings & Loan sold the building to construction and building management company Koll Co. for $22.5 Million. Koll Co. leased the top two floors to United Artists for their corporate headquarters. [16]
1991	Numerous permits were issued for a building-wide retrofit to comply with Title 24 and the city's high-rise ordinance, resulting in the substantial remodeling of interior floors. Homat Properties is listed as the owner. Permits list noted architect Gin Wong Associates as the architect.[17] A permit was issued to remodel the parking structure. Gin Wong Associates is listed as the architect.[18] (The extent of the parking structure remodel is unknown; however, based on a comparison of original drawings and current conditions, changes appeared to have been minor.)
1992	A permit was issued for window wall alignment and new tempered glass on the first floor (the extent of glazing replacement is unclear).[19]
2005	A permit was issued to install four ventilation louvers into exterior windows on the second floor of the (secondary) south façade.[20] A permit was issued to remove broken concrete and replace the driveway in-kind.[21] A permit was issued for a renovation of the main lobby, extending the soffit ceiling, new flooring, new wall finishes and a new security desk.[22] From visual observation at ARG's site visit, any traces of Gin Wong's 1991 renovation (including patterned tile flooring) were removed, and replaced.[23]
2006	Based on photos and permits on file with the Beverly Hills Community Development Department, the primary (west) façade was remodeled, including replacing the entry door (from existing double entry doors to clear tempered glass doors with stain stainless steel top and bottom plates), new limestone paving to match interior lobby, and new stainless steel railings.[24]

[15] "Talk about a 'hot property'," *Los Angeles Times*, December 7, 1986, 192; "Beverly Hills Savings Moves," *Los Angeles Times,* July 17, 1983, 147.
[16] "Talk about a 'hot property'," *Los Angeles Times*; "Koll Co. Acquires Office Building," *Los Angeles Times*, November 17, 1985, 194.
[17] City of Beverly Hills Department of Building & Safety Permit No. C9102123.
[18] City of Beverly Hills Department of Building & Safety Permit No. 91004989.
[19] City of Beverly Hills Department of Building & Safety Permit No. 92002248.
[20] City of Beverly Hills Department of Community Development, Architectural Review, Approval Letter No. PL0310281.
[21] City of Beverly Hills Department of Building & Safety Permit No. BS0526482.
[22] City of Beverly Hills Department of Building & Safety Permit No. BS0564518.
[23] Gin Wong and Associates, "Ground Floor Entry & Lobby Floor Finish Pattern Plan," dated 1991, drawing sourced from Lamprecht & Louden, "Historic Resource Assessment: Proposed Façade Remodeling, 450 North Roxbury Drive," Prepared for the City of Beverly Hills Planning Department, 2019, 12.
[24] City of Beverly Hills Department of Community Development, Architectural Commission, Staff Report No. PL0606936.

An architectural review permit was issued for a façade remodel of the parking structure, including a new glass panel addition, replacing existing railing and adding new landscaping along Roxbury Drive.[25]

2009 A permit was issued for storefront alterations for a bank tenant.[26] From visual observation and Google Streetview, it appears that the original storefront on the north façade (third bay from the east end) was infilled with fixed window glazing, and a new storefront was added to the last bay on the west end.

Ca. 2019 From visual observation and Google Streetview, it appears that the metal planting trellises were installed in the parking structure planter beds at some point between 2019 and 2021.

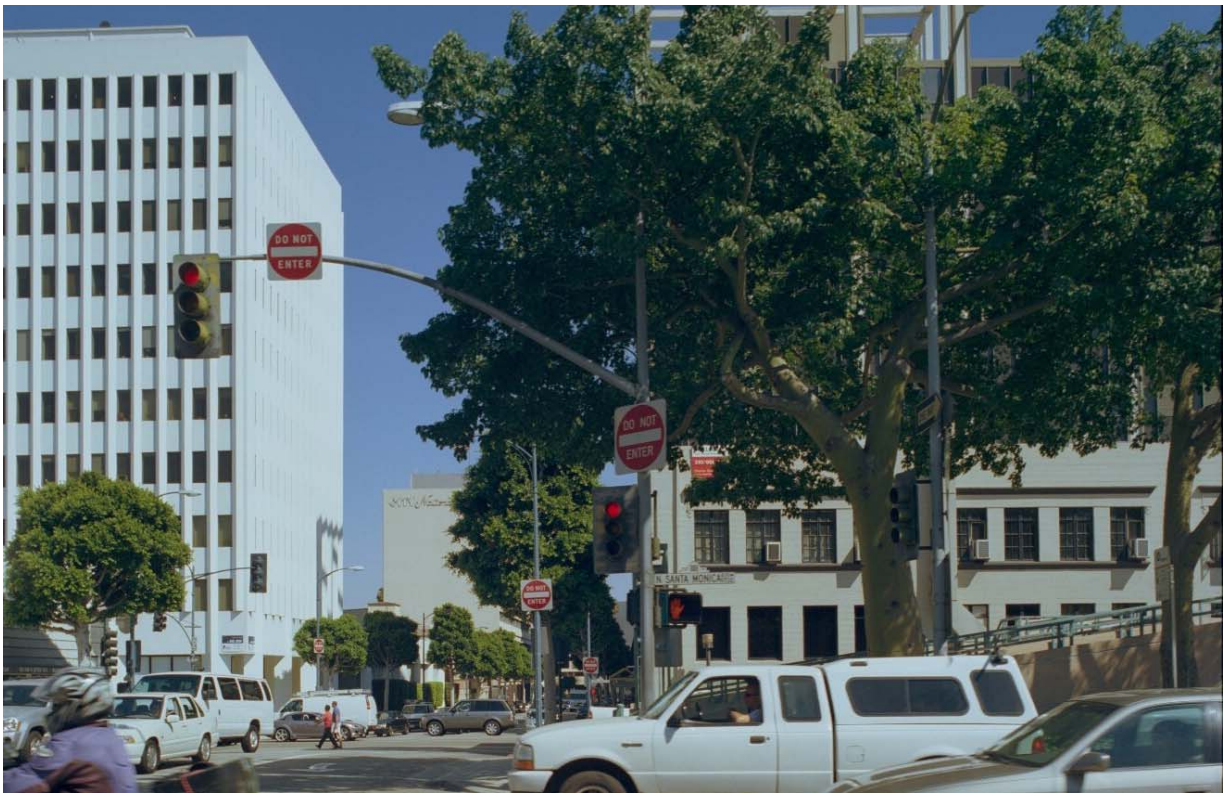
Historic Photos and Images

View northeast of the intersection of Santa Monica and Wilshire boulevards, 1972. The subject property is marked by red arrow (UCLA Digital Archives).

[25] City of Beverly Hills Department of Community Development, Architectural Review Permit No. PL0606936.
[26] City of Beverly Hills Department of Building & Safety Permit No. BS0903126.

View southeast of the intersection of Santa Monica Boulevard and Roxbury Drive, 1974. The subject property is on the left (photo by Ed Ruscha, Getty Research Institute).

View southeast of the subject property, 1974 (photo by Ed Ruscha, Getty Research Institute).



View southeast of the intersection of Santa Monica Boulevard and Roxbury Drive, 2007. The subject property is on the left (photo by Ed Ruscha, Getty Research Institute).

View southeast of the subject property, 2007 (photo by Ed Ruscha, Getty Research Institute).

3. Historical Background and Context

3.1 Commercial Development of Beverly Hills

The area that would become the City of Beverly Hills is centered on the junction of the Franklin, Coldwater, and Benedict Canyon drainages. This well-watered locale was heavily used by prehistoric peoples and later inhabited by the Tongva (Gabrielino) tribe. This area was explored by New Spanish administrator Captain Gaspar de Portola in 1769, paving the way for colonists.[27] Around 1822, the Mexican government granted the Rancho Rodeo de las Aguas to settlers Maria Rita Valdez and her husband Vicente Valdez, who used the area's wetlands (*cienegas*) to water a 4,500 acre cattle ranch. The rancho passed through the hands of several other owners during the 19th century; some attempted to subdivide portions of the rancho for sale as small farms and even as a townsite, but met with failure.

The Rancho Rodeo de las Aguas saw a new burst of activity at the turn of the century, when the Amalgamated Oil Company hoped to exploit the land's deeply buried oil reserves. When the oil proved inaccessible, the syndicate reorganized as the Rodeo Land and Water Company in 1906 and focused on subdividing the area currently bordered by Whittier Drive, Doheny Drive, Wilshire Boulevard, and the foothills above Sunset Boulevard as a real estate development. Prompted largely by concern over the water and school systems, residents voted to incorporate in 1914 and created the new City of Beverly Hills.[28]

Beverly Hills's earliest commercial properties were constructed during its initial subdivision. The city's first commercial building housed a grocery and butcher shop near the Pacific Electric station that was located at Canon Drive and Santa Monica Boulevard. In 1907, the Peck Building (demolished in the 1920s) was constructed by the Rodeo Land and Water Company at the southwest corner of Beverly Drive and Santa Monica Boulevard.[29] In 1912, the Beverly Hills Hotel opened, attracting wealthy visitors and movie stars to the town. As Beverly Hills's population did not increase significantly until the 1920s, commercial development continued at a leisurely pace through the first decades of the 20th century.

The 1920s real estate boom in Beverly Hills and throughout Southern California helped to spur commercial growth. In the late 1910s and early '20s, Hollywood celebrities such as Douglas Fairbanks, Mary Pickford, Will Rogers, Charlie Chaplin, and Gloria Swanson built their homes in the foothills above Sunset Boulevard.[30] The city's association with movie stars and the motion picture industry further attracted residents and new businesses. In 1923, the city's Chamber of Commerce was formed in order to "promote the economic, commercial, industrial, civic and social welfare of the people of the City of Beverly Hills and vicinity."[31] Beverly Hills's business district formed between Santa Monica Boulevard and the railroad tracks to the north, Rexford Drive to the east, and Wilshire Boulevard to the southwest. This

[27] Marc Wanamaker, *Early Beverly Hills* (Charleston, SC: Arcadia Publishing, 2005), 7.
[28] Beverly Hills Historical Society, "Beverly Hills, A Brief History," accessed February 2024, http://www.beverlyhillshistoricalsociety.org/history.
[29] Johnson Heumann Research Associates, Beverly Hills Historic Resources Survey, prepared for the City of Beverly Hills, 1985-1986, 63.
[30] PCR Services Corporation, Historic Resources Survey Report, Part I: Historic Resources Survey Update and Part II: Area 4 Multi-Family Residence Survey, prepared for the City of Beverly Hills, 2004, 12.
[31] "History of the Chamber," *Beverly Hills Chamber of Commerce*, accessed February 2024, http://www.beverlyhillschamber.com/pages/HistoryoftheChamber.

area became known as the "commercial triangle" (sometimes referred to as the "golden triangle"). The city's first business block was constructed in the 9400 block of Santa Monica Boulevard by J.L. Kennedy and William Canfield in the 1920s. Beverly Drive was the primary commercial corridor, home to a variety of businesses, including markets, clothiers, drug stores, and financial institutions. Between 1920 and 1934, over 200 commercial properties were constructed in Beverly Hills.[32]

By the 1920s, Santa Monica Boulevard had developed as a major thoroughfare, running through a significant portion of the city. Brick apartment houses and smaller Period Revival-style commercial properties lined the two-mile stretch of Santa Monica Boulevard through the city. Beverly Hills became home to several high-end department stores and restaurants, including Saks Fifth Avenue, I. Magnin, the Beverly Hills Brown Derby, and Romanoff's, the city's most popular movie star dining establishment through the 1950s.[33] By the mid-1930s, large financial, retail, entertainment, and office buildings had been constructed, most of them in popular Moderne designs. The works of prominent local architects, including Parkinson and Parkinson, Walker and Eisen, Paul R. Williams, and S. Charles Lee comprised much of the city's commercial building stock during this time period.[34] As automobiles became mainstream in Southern California, Beverly Hills and other areas outside of downtown evolved into reputable commercial centers.

During the city's population boom following World War II, Beverly Hills experienced a tremendous increase in commercial growth that redefined the landscape of major thoroughfares such as Wilshire and Santa Monica boulevards. Modest-sized structures, typically three to four stories in height, comprised much of the city's commercial construction from the late 1940s through the mid-1950s. However, by the late 1950s and '60s, high-rise financial buildings, office towers, and large-scale retail properties, often designed by prominent local architects, began to characterize commercial development in Beverly Hills.[35] Properties such as Welton Becket's Beverly Hilton (1956), Edward Durrell Stone's Perpetual Savings and Loan (1961), and Sidney Eisenshtat's Lesser Enterprises (1962), came to define the city's commercial building stock. Other noted postwar architects who contributed to Beverly Hills's commercial streetscape include Maxwell Starkman, I.M. Pei, and A.C. Martin and Associates.[36]

Beverly Hills experienced an increase in the development of commercial high-rise buildings in the late 1960s due to a number of factors:

1. The critical need for office space in the city.
2. An economically feasible floor area ratio (density) for commercial construction.
3. Liberalization of zoning regulations to permit full development of expensive real estate here within that ratio.[37]

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[32] Johnson Heumann Research Associates, Beverly Hills Historic Resources Survey, 63-64.

[33] Kevin Roderick and J. Eric Lynxwiler, *Wilshire Boulevard: Grand Concourse of Los Angeles* (Santa Monica: Angel City Press, 2005), 158.

[34] Johnson Heumann Research Associates, Beverly Hills Historic Resources Survey, 71 and 78.

[35] Gerald Faris, "Skyline Signaling End of B.H. Building Slump," *Los Angeles Times*, 149 and 154.

[36] PCR Services Corporation, Historic Resources Survey Report, 15; Jones & Stokes, "City of Beverly Hills Historic Resources Survey Report, Survey Area 5: Commercial Properties," prepared for the City of Beverly Hills Planning and Community Development Department, June 2006, rev. April 2007, 7-8.

[37] Gerald Faris, "Skyline Signaling End of B.H. Building Slump," *Los Angeles Times*, 149, 154 and 157.

According to Max Strauss, city planning and building director, "With the changes in density and zoning, it is now possible to profitably develop buildings that would have spelled financial loss two and three years ago."[38] In 1967, City Council raised the building height limit to ten stories, further enabling new high-rise construction.[39] According to the city's Planning Department, in 1969, "Current major office construction projects add[ed] up to some $23 million in basic building costs."[40] Wilshire Boulevard witnessed the bulk of this new development, with prominent projects including Craig Ellwood's Security Pacific Plaza (1969), William Pereira's Great Western Savings Center (1972), and Anthony Lumsden's Manufacturers Bank (1974).[41] While Wilshire Boulevard saw the largest concentration of high-rise development during the 1960s and '70s, large-scale Late Modern and Corporate International-style commercial office buildings were also built along Santa Monica Boulevard, including the subject property at the corner of Roxbury Drive and Santa Monica Boulevard (450 N. Roxbury Drive, 1970), the Wells Fargo building at the corner of Camden Drive and Santa Monica Boulevard (441 N. Camden Drive, designed by Sidney Esinshtat, 1972), and the Bank of America building at 9440 Santa Monica Boulevard (designed by Oxley & Landau, 1974).

3.2 Architecture

The property at 450 N. Roxbury Drive represents a modest interpretation of the Corporate International style. The Corporate International style, sometimes referred to as Corporate Modernism or simply as "Corporate architecture," is a subset of postwar Modernism that was primarily used in the design of large-scale commercial office and government buildings in the 1950s through the early 1970s.[42] With the country's economic boom in the years following World War II, corporations were placed in the spotlight and looked to an architectural aesthetic that could position them as "agents of modernity and progress."[43] As a result, glass, steel, and concrete high rises became the interchangeable face of Corporate America.[44] Rooted in functionality and structure, Corporate International architecture prioritized use and flexible interior spaces for office tenants instead of exterior ornamentation.[45] The architectural aesthetic is characterized by vertical volumes, boxy massing, smooth unornamented cladding, and large expanses of glass divided by a steel or concrete structural elements. The architectural idiom thrived throughout greater Los Angeles given the region's position as an epicenter for corporations and governmental institutions.[46] Notable Corporate International buildings in Beverly Hills include Welton Becket's City National Bank at 404 N. Roxbury Drive (1955), Palmer and Krisel's Sunset International Petroleum Building at 8920 Wilshire Boulevard (1963), Sidney Eisenshtat's Union Bank of California at 9460 Wilshire Boulevard (1960), and Craig Elwood's Security Pacific Plaza at 9665 Wilshire Boulevard (1972).[47] Corporate International architecture fell out of favor in the mid-1970s as many architects

[38] Ibid.
[39] Ibid.
[40] Ibid.
[41] PCR Services Corporation, Historic Resources Survey Report, 16.
[42] City of Los Angeles, "SurveyLA Los Angeles Citywide Historic Context Statement, Context: Architecture and Engineering, 1850-1980, Subcontext: L.A. Modernism, 1919-1980, Subtheme: Corporate International, 1949-1975," prepared by Daniel Paul for the City of Los Angeles, Department of City Planning, Office of Historic Resources (2021), 155.
[43] Ibid.
[44] Ibid, 129.
[45] Ibid, 156.
[46] Ibid, 158.
[47] Jones & Stokes, City of Beverly Hills Historic Resources Survey Report.

"began to express dissatisfaction with [its] ubiquitous aesthetic and formulaic methodology," and later iterations of Modernism and Postmodernism gained popularity.[48]

Character defining features of the Corporate International style include:

- Box-shaped form
- Concrete, steel and glass construction
- Flat roof, either with flush eaves or cantilevered slabs
- Horizontal bands of flush metal windows or curtain walls
- Lack of applied ornament
- Double-height ground story set back behind columns or *pilotis*
- Integral parking structure
- Landscaped plaza or integral plantings at the ground floor[49]

Norbert W. Pieper, Architect

The subject property was designed by architect Norbert W. Pieper, head of design at the architecture and engineering firm of Sheldon L. Pollack & Associates, Inc.[50] Pieper was born in 1924 in Oakland, California. He served with the US Navy during World War II before going on to earn his bachelor's degree in architecture from the University of California at Berkeley in 1951.[51] By the mid-1950s, Pieper had begun working for Sheldon L. Pollack as head of the architectural department and later as vice president.[52] He maintained this role with the firm for nearly four decades until Pollack tragically died in a plane crash in 1989.[53] While research did not produce a significant amount of information related to Pieper's work, some of his known projects include the post office in La Verne (1964), Carousel Theatre in West Covina (1965), Fisherman's Village in Marina Del Rey (1969), and Seaport Village in San Diego (1979).

Sheldon L. Pollack, Builder and Engineer

Sheldon L. Pollack served as the builder and engineer of 450 N. Roxbury Drive. Born in Los Angeles in 1926, Pollack earned his civil engineering degree from the University of Southern California in 1948.[54] After graduating, he worked for the Los Angeles Building and Safety Department from 1948 to 1950.[55] Following a brief period in civil service, he joined the General Engineering Services Co. as chief engineer. In 1954, Pollack established the engineering and architecture firm Sheldon L. Pollack & Associates and the construction company Sheldon L. Pollack Construction Corp. As described by Pollack, the two companies represented a "total concept," offering comprehensive site analysis, design, planning, engineering, and

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[48] Ibid, 163.
[49] Ibid, 165.
[50] "Work on $1.5 Million Building Completed," *Los Angeles Times*, December 13, 1959, 189. Builder and engineer Sheldon L. Pollack formed the firm of Sheldon L. Pollack & Associates at the same time as his construction company, Sheldon L. Pollack Corp.
[51] "Reinstatement Application for Norbert Wels Pieper," American Institute of Architects, 1980; American Institute of Architects, *American Architects Directory*, 3rd Edition 1970 (New York: R.R. Bowker Company, 1970), 719.
[52] "He Sticks to His Estimates," *Los Angeles Times*, September 4, 1966, 58.
[53] "Arizona Plane Crash Kills Developer Sheldon Pollack," *Los Angeles Times*, February 20, 1989, 36.
[54] "He Sticks to His Estimates," *Los Angeles Times*; Andy Miller, "Private dormitory proposed by agency," *Daily Trojan*, October 22, 1969, 1.
[55] "Sheldon Pollack Named Utility commissioner," *Los Angeles Times*, August 17, 1960, 46.

property management services for commercial real estate projects.[56] Pollack prided himself on "developing buildings for clients at a predetermined price with a predetermined occupancy date."[57]

In 1966, Sheldon A. Pollack & Associates and Sheldon L. Pollack Construction Corp. combined under Sheldon L. Pollack Corp. That same year, the company relocated from its headquarters in the Pico-Hayworth Building to its new headquarters at 3344 S. La Cienega Boulevard.[58] Sheldon L. Pollack Corp. was acquired by American Medical Corp. (owner, manager, and developer of hospitals) in 1970.[59] The following year, Pollack announced the formation of a new real estate development firm under his name, located at 404 N. Roxbury Drive.[60]

Throughout his forty-year career, Pollack specialized in the development of commercial and institutional buildings, including a post office in La Verne (1964), Carousel Theatre in West Covina (1965), Fisherman's Village in Marina Del Rey (1969), Seaport Village in San Diego (1979), and Harvey Mudd College dormitories in Claremont (1982). Pollack worked with architect Norbert W. Pieper for the majority of his career. While arguably prolific, the duo were known for "coming in on time and on budget, not [their] architectural theory."[61]

Pollack was involved in the community outside of his business endeavors and served as a commissioner for the Bord of Public Utilities and Transportation commission from 1960 until 1965.[62] He also served as president of the Civil Engineering Alumni of USC and director of the Foundation for the Junior Blind.[63] Pollack died suddenly in a self-piloted plane crash in 1989 at the age of 62.[64]

3.3 Ownership History

The subject property was originally owned and partially occupied by the entertainment law firm of Kaplan, Livingston, Goodwin, Berkowitz, and Selvin. Established in 1940 and led by senior founding partner Leon Kaplan, the firm had gained a reputation for handling "the affairs of many of the most glamourous people in Hollywood" by the late 1950s and '60s. According to Kaplan, "In the 1950s, we grew from a small, struggling entertainment firm to one that had influential clients and was a significant player in the industry."[65] By the early postwar period, the firm's client list included 20th-Century Fox, the William Morris Agency, Warner Brothers, Rita Hayworth, Charlse Bronson, and Flip Wilson, among

[56] "Total Concept Key to Success of Pollack Co.," *Pasadena Independent*, December 15, 1966, 13.
[57] "He Sticks to His Estimates," *Los Angeles Times.*
[58] "Total Concept Key to Success of Pollack Co.," *Pasadena Independent*; "Architectural Firm Occupies New Headquarters Building," *Los Angeles Times*, November 8, 1959, 128.
[59] "Sheldon L. Pollack Acquisition Agreed," *Los Angeles Evening Citizen News*, January 22, 1970, 15; "Firm Acquires Sheldon Pollack," *Los Angeles Times*, April 7, 1970, 55.
[60] "Pollack Forms New Company," *Los Angeles Times*, May 16, 1971, 169.
[61] Wim de Wit and Christopher Alexander, *Overdrive: L.A. constructs the future, 1940-1990* (Los Angeles: Getty Research Institute, 2013), 206-207.
[62] "Sheldon Pollack Named Utility commissioner," *Los Angeles Times*.
[63] "Pollack Heads Unit of Capital for Israel Inc.," *Valley Times*, April 26, 1969, 10.
[64] "Arizona Plane Crash Kills Developer Sheldon Pollack," *Los Angeles Times*, February 20, 1989, 36.
[65] Marilyn Black and Andy Lewis, "A Hollywood Power Lawyer's Lost Memoir on Birthing Independent Film," *The Hollywood Reporter*, April 21, 2016, accessed February 2024, https://www.hollywoodreporter.com/lifestyle/arts/a-hollywood-power-lawyers-lost-884979/.

others.[66] With their growing prominence and expansion in the mid-1950s, Kaplan, Livingston, Goodwin, Berkowitz, and Selvin commissioned the architecture firm of Ashton & Wilson to design their new office building at 270 N. Canon Drive, which was completed in 1957; the firm operated out of the two top floors of the building for the next 13 years (building still extant).[67]

The company continued to grow into the late 1960s, prompting the need for a large office space. In 1969, the firm commissioned Sheldon Pollack and Norbert Pieper to design and construct the subject property. The firm relocated to the ninth floor of the building upon its completion in 1970. While the company continued to prosper in the early to mid-1970s, by the late 1970s, it appeared to be experiencing considerable growing pains, which were further exacerbated by a series of strikes in the entertainment industry. By 1981, 32 of its 65 partners and associates had left the company. The firm dissolved soon thereafter and sold 450 N. Roxbury Drive in 1983.[68]

Kaplan, Livingston, Goodwin, Berkowitz, and Selvin sold the property to Beverly Hills Federal Savings & Loan for $20 Million in 1983.[69] Beverly Hills Federal Savings & Loan's ownership of the property was short-lived, and in 1985 they sold it to the construction and building management company Koll Co. for $22.5 Million. Koll Co. leased the top two floors to United Artists for their corporate headquarters and in 1986, United Artists acquired the property.[70] By 1991, United Artists had sold the property to Homat Properties.[71] It is unclear how long Homat Properties owned the building. However, by 2005, the current owner, Starpoint Properties, had acquired 450 N. Roxbury Drive.[72]

[66] Dan Morain, "Scrambling to Represent the Stars," *Los Angeles Times*, November 18, 1981.
[67] It is unclear where the firm was located prior to 270 N. Canon Drive, but newspapers suggest their offices may have been in Hollywood.
[68] Talk about a 'hot property'," *Los Angeles Times*; Morain, "Scrambling to Represent the Stars," *Los Angeles Times*.
[69] "Talk about a 'hot property'," *Los Angeles Times*, December 7, 1986, 192; "Beverly Hills Savings Moves," *Los Angeles Times,* July 17, 1983, 147.
[70] "Talk about a 'hot property'," *Los Angeles Times*; "Koll Co. Acquires Office Building," *Los Angeles Times*, November 17, 1985, 194.
[71] City of Beverly Hills Department of Building & Safety Permit No. C9102123.
[72] City of Beverly Hills Department of Building & Safety Permit No. 0526482.

4. Regulatory Framework

4.1 Definition of Historical Resources

Pursuant to Section 15064.5 of the California Code of Regulations (CCR), Title 14, Chapter 3, the following are considered historical resources for the purposes of CEQA:

1. A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register).

2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the California Public Resources Code (PRC), or identified as significant in an historical resource survey meeting the requirements in Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register (PRC SS5024.1; Title 14 CCR, Section 4852).

4.2 Federal, State, and Local Evaluation Criteria

National Register of Historic Places

The National Register is the nation's master inventory of known historic resources. Created under the auspices of the National Historic Preservation Act of 1966, the National Register is administered by the National Park Service (NPS) and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archeological, or cultural significance at the national, state, or local level. As described in National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation*, in order to be eligible for the National Register, a resource must both (1) be significant and (2) retain sufficient integrity to convey its significance.

Significance is assessed by evaluating a resource against established criteria for eligibility. A resource is considered significant if it satisfies any one of the following four National Register criteria:[73]

A. Associated with events that have made a significant contribution to the broad patterns of our history;

B. Associated with the lives of significant persons in our past;

[73] Some resources may meet multiple criteria, though only one needs to be satisfied for National Register eligibility.

C. Embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction;

D. Has yielded, or may be likely to yield, information important in prehistory or history.

Once significance has been established, it must then be demonstrated that a resource retains enough of its physical and associative qualities – or integrity – to convey the reason(s) for its significance. Integrity is best described as a resource's "authenticity" as expressed through its physical features and extant characteristics. Whether a resource retains sufficient integrity for listing is determined by evaluating it against the seven aspects of integrity defined by the NPS:

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

Integrity is evaluated by weighing all seven of these aspects together and is ultimately a "yes or no" determination – that is, a resource either retains sufficient integrity or it does not.[74] Some aspects of integrity may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for its significance. Since integrity depends on a resource's placement within a historic context, integrity can be assessed only after it has been established that the resource is significant, and under which criteria.

Generally, a resource must be at least 50 years of age to be eligible for listing in the National Register. Exceptions are made if it can be demonstrated that a resource less than 50 years old is (1) of exceptional importance or (2) is an integral component of a historic district that is eligible for the National Register.

California Register of Historical Resources

The California Register is the authoritative guide to the State's significant historical and archeological resources. In 1992, the California legislature established the California Register "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what

[74] Derived from National Register Bulletin 15, Section VIII: "How to Evaluate the Integrity of a Property."

properties are to be protected, to the extent prudent and feasible, from substantial adverse change."[75] The California Register program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for historic preservation grant funding; and affords certain protections under CEQA. All resources listed in or formally determined eligible for the National Register are automatically listed in the California Register. In addition, properties designated under municipal or county ordinances, or through local historic resources surveys, are eligible for listing in the California Register.

The structure of the California Register program is similar to that of the National Register, but places its emphasis on resources that have contributed specifically to the development of California. To be eligible for the California Register, a resource must first be deemed significant at the local, state, or national level under one of the following four criteria, which are modeled after the National Register criteria listed above:

1. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state, or the nation.[76]

Like the National Register, the California Register also requires that resources retain sufficient integrity to be eligible for listing. A resource's integrity is assessed using the same seven aspects of integrity used for the National Register. However, since integrity thresholds associated with the California Register are generally less rigid than those associated with the National Register, it is possible that a resource may lack the integrity required for the National Register but still be eligible for listing in the California Register.

There is no prescribed age limit for listing in the California Register, although California Register guidelines state that "sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource."[77]

[75] California Public Resources Code, Section 5024.1 (a).

[76] California Public Resources Code SS5024.1, Title 14 CCR, Section 4852.

[77] California Office of Historic Preservation, *Technical Assistance Series #6: California Register and National Register: A Comparison* (Sacramento, CA: California Department of Parks and Recreation, 2001), 3. According to the *Instructions for Recording Historical Resources* (Office of Historic Preservation, March 1995), "Any physical evidence of human activities over 45 years old may be recorded for purposes of inclusion in the OHP's filing system. Documentation of resources less than 45 years old may also be filed if those resources have been formally evaluated, regardless of the outcome of the evaluation." This 45-year threshold is intended to guide the recordation of potential historical resources for local planning purposes, and is not directly related to an age threshold for eligibility against California Register criteria.

Resources are automatically listed in the California Register if they are listed in or have been officially determined eligible for the National Register. State Historic Landmarks #770 and forward are also automatically listed in the California Register.[78]

City of Beverly Hills Historic Preservation Ordinance

Historic preservation in Beverly Hills is governed by Title 10, Chapter 3, Articles 32 and 32.5 of the Beverly Hills Municipal Code (referred to hereafter as the Ordinance). The Ordinance authorizes the Cultural Heritage Commission (CHC) to recommend the nomination of properties as local landmarks and historic districts to the City Council. To facilitate this process, the Ordinance establishes requirements a property must meet in order to qualify for designation as a landmark listed in the City of Beverly Hills Register of Historic Properties. The 2012 Ordinance was revised and updated in 2015, with an additional amendment in 2016; all criteria and definitions used in this document are effective as of April 1, 2016.

To be eligible for local designation as a historic landmark, a property must satisfy the following sets of requirements (A and B) as noted:

A. A landmark must meet all of the following requirements:

(1) It is at least forty five (45) years of age, or is a property of extraordinary significance;

(2) It possesses high artistic or aesthetic value, and embodies the distinctive characteristics of an architectural style or architectural type or architectural period;

(3) It retains substantial integrity[79] from its period of significance; and

(4) It has continued historic value to the community such that its designation as a landmark is reasonable and necessary to promote and further the purposes of this article.

B. In addition to those listed above, a landmark must meet at least one of the following requirements:

(1) It is listed on the National Register of Historic Places;

(2) It is an exceptional work[80] by a master architect[81];

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[78] California Office of Historic Preservation, *Technical Assistance Series #5: California Register of Historical Resources, The Listing Process* (Sacramento, CA: California Department of Parks and Recreation, n.d.), 1.

[79] In BHMC 10-3-3202, the Ordinance defines "substantial integrity" as "Integrity that is considerable in importance, value, degree, amount, or extent, and that continues to exist, or would have continued to exist, but for work done without appropriate permits after the enactment of this article."

[80] A 2016 amendment to BHMC 10-3-32 in Ord. 15-O-2700 defines "exceptional work" as "A remarkably superior example of architectural work that has been recognized as such by members of the architectural community. At a minimum, the work's exceptional quality shall have been documented by at least one of the following: a) it was the subject of a major architectural award; b) it was substantively discussed (i.e., not just mentioned) and photographically depicted in a monograph on a master architect's career; or c) it was substantively discussed or photographically depicted in at least two (2) publications (e.g., a book, treatise, trade magazine article, film, or set of photographs made available to the public by an institutional archive) authored by acknowledged experts in the field of architecture. A monograph or publication made available to the public solely in electronic form and without any reasonable expectation of compensation to the author, or substantially authored by the architect of the work, shall not count toward this minimum."

[81] In BHMC 10-3-3202, the Ordinance defines "master architect" as "An architect of widely recognized greatness in the field of architecture whose individual genius influenced his or her age."

(3) It is an exceptional work that was owned and occupied by a person of great importance, and was directly connected to a momentous event in the person's endeavors or the history of the nation. For purposes of this subsection B3, personal events such as birth, death, marriage, social interaction, and the like shall not be deemed to be momentous;

(4) It is an exceptional property that was owned and occupied by a person of great local importance;

(5) It is an iconic property[82]; or

(6) The landmark designation procedure is initiated, or expressly agreed to, by the owner(s) of the property. (Ord. 15-O-2682, eff. 11-19-2015).

Mirroring the National Register and California Register, the Ordinance requires that a resource retain integrity. The Ordinance defines integrity as "the ability of a property to convey its historical significance through its location, design, setting, materials, workmanship, feeling, relevant association, and character defining features."[83] This builds upon the definition that is used by the National Register.

[82] In BHMC 10-3-3202, the Ordinance defines "iconic property" as "A property that has been visited and photographed so often by residents and visitors to the city that it has become inextricably associated with Beverly Hills in the popular culture and forms part of the city's identity to the world at large."
[83] BHMC 10-3-3202, Definitions.

5. Evaluation of Historical Significance

5.1 Previous Evaluations and Studies

The property at 450 N. Roxbury Drive is not formally listed in the National Register, California Register, or Beverly Hills Local Register of Historic Properties. Furthermore, it was not identified in the Beverly Hills Historic Resources Survey (Johnson Heumann Research Associates, 1985-1986) or Historic Resources Survey Update of Survey Area 5: Commercial Properties (Jones & Stokes, 2006-2007). It is not listed in California's Built Environment Resource Directory (BERD).

According to a 2019 Architectural Commission Report prepared by City Planning staff, the subject property is a potential contributor to an eligible postwar commercial historic district. The staff report describes the property in the following manner:

> The building design expresses a simplified grid pattern with a repeating triangular motif found in the projecting triangulated vertical piers between the individual window bays and on the garage structure metal relief panels. The building appears to be an eligible historic resource as a potential contributor to an eligible post-war historic commercial district.[84]

The report does not provide information related to the boundaries of the district, when or how the district was identified, or under which registration criteria or level of significance (National Register, California Register, Beverly Hills Register) the district is eligible for designation.

5.2 Evaluation of Significance

Because the subject property was cited as eligible by City staff as a potential contributor to an eligible postwar historic district in 2019, ARG did not re-evaluate the property for eligibility as a district contributor. Rather, it is conservatively being treated as a potential district contributor for the purposes of this report. The following is an evaluation of potential individual eligibility.

The building and attached parking garage at 450 N. Roxbury Drive do not appear to be individually eligible for listing in the National Register, California Register, or as a Beverly Hills Landmark.

Following is an evaluation of the property for individual eligibility against federal, state, and local criteria.

National and California Register

National and California Register Criteria A/1: associated with events that have made a significant contribution to the broad patterns of history.

Constructed in 1970, the subject property is associated with the pattern of increased development of high-rise commercial buildings in Beverly Hills and along major streets such as Santa Monica and Wilshire boulevards following changes in zoning and an increase in the city's building height limit in the late 1960s. In 1969 alone, new major office construction projects in the city amounted to approximately $23 million in basic building costs. While the subject property is generally associated with the rise in Beverly Hills's

[84] City of Beverly Hills Planning Division, Beverly Hills Architectural Commission Report: 450 North Roxbury Drive, April 17, 2019.

large-scale commercial development in the late 1960s and '70s, it is one of dozens of extant commercial office buildings constructed during this time period, some of which are enumerated in *Section 3.1* and *Section 3.2* of this report and included in the Beverly Hills Historic Resources Survey Update of Survey Area 5: Commercial Properties (Jones & Stokes, 2006-2007). Thus, the property does not singularly convey this association with postwar high-rise commercial development patterns in the city in any significant way. For this reason, 450 N. Roxbury Drive is not eligible under Criteria A/1.

National and California Register Criteria B/2: associated with the lives of persons significant in our past.

Since its construction in 1970, the subject building has been owned and occupied by a number of national and international companies whose executives and chairpersons have presumably made significant contributions to their industries. The building was originally owned and partially occupied by the entertainment law firm of Kaplan, Livingston, Goodwin, Berkowitz, and Selvin, led by senior founding partner Leon Kaplan. Founded in 1940, the firm had gained a reputation for handling "the affairs of many of the most glamourous people in Hollywood" by the late 1950s and '60s, representing clients such as 20th-Century Fox, the William Morris Agency, Warner Brothers, Rita Hayworth, Charles Bronson, and Flip Wilson, among others.[85] The law firm, and Leon Kaplan, in particular, appears to have played a significant role in the development and growth of the entertainment industry and has a direct association with the subject property. However, per National Register Bulletin 15, "each property associated with an important individual should be compared to other associated properties to identify those that best present the person's historic contributions."[86] Kaplan's significance as a founding partner of the entertainment law firm is arguably better represented by the extant office building at 270 N. Canon Drive, where the company rose to prominence in the late 1950s and '60s. Thus, the subject property is not eligible for its association with Kaplan.

Other early occupants of the property included the oil and gas law firm of Ball, Hart, Hunt, Brown & Baerwitz, Merrill Lynch, and Time, Inc. Owners of the property in the 1980s included Beverly Hills Savings and Loan, Koll Co., and United Artists. While some of these owners/occupants represent large national and international companies with executives and chairpersons who have made significant contributions to their respective industries, the subject property does not appear to have served as an early, long-standing, and/or singular location of any of these companies. Both Time, Inc. and Merrill Lynch held multiple offices during their occupancy of the subject property, and 450 N. Roxbury Drive does not appear to have served as their main headquarters. While the property served as United Artists' corporate headquarters in the 1980s, the company, which was founded in 1919, had reached its most formative period in terms of its contributions to the entertainment industry long before its ownership/occupation of the building. For these reasons, the subject property is not eligible for its associations with these corporations or any significant individuals who led or were employed by them.

For the reasons stated above, the property is ineligible under Criteria B/2.

[85] Dan Morain, "Scrambling to Represent the Stars," *Los Angeles Times*, November 18, 1981.
[86] National Register Bulletin 15, 15.

National and California Register Criteria C/3: embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.

The subject building is a modest and relatively late example of the Corporate International style. The building retains the typical features of the architectural idiom, including its boxy massing, flat roof, steel and concrete structural system, double-height ground story set back behind columns, and overall lack of ornamentation. However, it lacks the distinctive characteristics found in more highly articulated examples of the style, such as horizontal bands of flush windows or curtain walls and landscaped plazas. There are better examples of Corporate International commercial high-rise buildings found throughout the city and delineated in *Section 3.2*. Furthermore, research did not suggest that Norbert W. Pieper, the building's original architect or Sheldon Pollack, the building's original developer, were considered masters of their respective fields. Notably, the duo were known more for their efficiency and ability to stay on budget as opposed to their architectural prowess. Gin Wong Associates (who is on the Beverly Hills list of master architects)[87] designed a substantial interior remodel of the building and remodel of the parking structure in the early 1990s, including a redesign of the main ground floor lobby. However, building permits and visual observation of the building lobby during ARG's site visit suggest that little, if any, of Wong's design remains. And, based on a comparison of original drawings and current conditions, the changes Wong oversaw for the parking structure were very minor. Thus, it cannot be said that the building's interior design or the parking structure remodel represents Wong's work as a master architect.

For the reasons stated above, the subject property is not eligible under Criteria C/3.

National and California Register Criteria D/4: has yielded or may likely yield information important in prehistory or history.

ARG did not observe any features on the property that appear likely to yield information important in prehistory or history. In addition, the property has been graded and developed, and its shallow subsurface is unlikely to yield such information. Therefore, based on what can be observed on the site, the property does not appear to be eligible under Criterion D or 4 of the National or California Registers.

City of Beverly Hills Landmark Criteria

ARG concludes that the property does not meet eligibility criteria for listing as a Beverly Hills Landmark. Following is an evaluation of 450 N. Roxbury under local registration criteria.

Part A Eligibility Criteria (resource must meet all four of the following requirements):

Criterion A.1: *it is at least forty five (45) years of age, or is a property of extraordinary significance.*

Constructed in 1970, the subject property is 54 and thus satisfies Criterion A.1.

[87] https://www.beverlyhills.org/cbhfiles/storage/files/11532334261958763470/MasterArchitectList_Version3-1_active.pdf.

Criterion A.2: it possesses high artistic or aesthetic value, and embodies the distinctive characteristics of an architectural style or architectural type or architectural period.

As described in its evaluation under National/California Register Criteria C/3, the property represents a modest and relatively late example of a Corporate International style office building. While the building retains the typical features of the architectural idiom, it lacks the distinctive characteristics found in more highly articulated examples of the style, such as horizontal bands of flush windows or curtain walls and landscaped plazas. Furthermore, there are several better, more highly articulated examples of the style and architectural type as described in *Section 3.2* of this report.

Criterion A.3: *it retains substantial integrity from its period of significance.*

The building retains its original location at the intersection of Roxbury Drive and Santa Monica Boulevard and its setting within the Beverly Hills commercial triangle. While the building has undergone several interior remodels since its original construction, and some of its original storefronts have been altered with new doors/glazing, the vast majority of the building's original materials and design features (flat roof, boxy massing, fixed aluminum windows divided by triangular-shaped pilasters, double-height ground story recessed behind columns, integrated parking garage) remain intact. Its intact design and materials help to convey its original workmanship and historic feeling and association. Thus, the building retains all seven aspects of integrity (location, design, setting, materials, workmanship, feeling, and association) as defined by the National Park Service and meets Criterion A.3.

Criterion A.4: it has continued historic value to the community such that its designation as a landmark is reasonable and necessary to promote and further the purposes of this article.

Because the building is a relatively late and modest example of a Corporate International office building, reflects one of dozens of commercial high rises built in the city during the 1960s and '70s, and does not appear to have any singularly significant associations with notable historic individuals, it cannot be said that the building possesses historic value to the community in a way that would merit consideration under this criterion. Thus, the property does not satisfy Criterion A.4.

Summary of Local Eligibility

In summary, the subject property meets Landmark Criteria A.1 and A.3. It does not meet Criteria A.2 and A.4. Because a property must satisfy all four Part A eligibility criteria for consideration as a Beverly Hills Landmark, 450 N. Roxbury Drive is not eligible for local designation. It has thus not been evaluated under Part B eligibility criteria.

6. Impacts Analysis

6.1 Summary of Historical Resource Findings

Pursuant to Section 15064.5(a)(2) of the State CEQA Guidelines (CEQA Guidelines), the term "historical resource" includes a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); a resource included in a local register of historical resources or identified as significant in a historical resources survey meeting the requirements defined in Section 5024.1(g) of the Public Resources Code; or any resource which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California…provided the lead agency's determination is supported by substantial evidence in light of the whole record.

Per the 2019 Architectural Commission Report prepared by City Planning staff, the subject property is a potential contributor to an eligible postwar commercial historic district. While the report does not provide information related to the boundaries of the district, when or how the district was identified, or whether it is eligible for listing in the California Register, ARG is conservatively treating the property as a contributor to the potential district and the district as a historical resource under CEQA.

6.2 Significance Threshold

According to California CEQA Guidelines, a project has the potential to impact a historical resource when the project involves a "substantial adverse change" in the resource's significance. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."[88]

The significance of an historical resource is materially impaired when a project:

a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, the California Register of Historical Resources; or

b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project by a preponderance of evidence that the resource is not historically or culturally significant; or

c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the

[88] *CEQA Guidelines,* Section 15064.5.

California Register of Historical Resources as determined by a lead agency for the purposes of CEQA.[89]

6.3 Project Description

The Project includes the rehabilitation of a portion of the office building's attached parking garage for use as retail space. Four retail storefronts totaling approximately 6,797 square feet would be added in the south half of the ground floor level of the parking garage. Four of the garage bays, which are currently infilled with original, decorative aluminum screens and raised planters, would be altered to accommodate four glazed storefront assemblies fronting Roxbury Drive. Vehicular entries/exits at the east and west ends of the garage would be retained, as would parking spaces in the north half of the ground floor level, the two below-ground levels, the second floor above-ground level, and the roof level. No changes to the office building are proposed under the Project.

6.4 Analysis of Project Impacts

As noted above, a project has the potential to impact a historical resource if the project would result in a "substantial adverse change" to its significance. Generally speaking, substantial adverse change is defined as demolition or material alteration in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in or eligibility for listing in a federal, state, and/or local register of historical resources.

As discussed above, 450 N. Roxbury Drive was identified by City staff as a potential contributor to an eligible postwar commercial historic district, and ARG is conservatively treating the district as a historical resource for the purposes of CEQA. As described in ARG's evaluation of significance in *Section 5.2*, the subject property is not individually eligible for listing in the National Register, California Register, or as a Beverly Hills Landmark. Because the historical resource as defined by CEQA is the postwar commercial historic district and not the individual office building and attached parking garage, the focus of the analysis provided herein is the potential material impairment of 450 N. Roxbury Drive as a district contributor and the ability of the historic district to continue to convey its significance after completion of the Project.

The Project would not result in the demolition of the building or attached parking garage. The Project proposes a few changes to the exterior of the parking garage, including removal of original aluminum screens/panels and raised planters in four bays fronting Roxbury Drive and the installation of four glazed retail storefront assemblies. However, the overall height, form, massing, setbacks, design, and the majority of the property's original features and materials (i.e. its simplified grid pattern, vertical concrete piers, and size/pattern of its window and garage bays, as noted in the 2019 Architectural Commission Report), would remain. No changes would be made to the exterior of the office building.

Because the Project would preserve the vast majority of 450 N. Roxbury's extant historic materials and features, the building and attached parking garage would retain the physical characteristics that account

[89] Ibid.

for their potential eligibility as a contributor to the eligible postwar commercial historic district identified by City staff in 2019.

6.5 Summary of Continued Eligibility

In summary, the Project would not result in any changes to 405 N. Roxbury Drive such that it would no longer be potentially eligible as a contributor to the eligible postwar commercial historic district identified by City Planning staff. The property would continue to convey its overall appearance and original design as a postwar commercial office building. The Project would not alter the height, scale, or setbacks of the subject property, and thus, no proposed changes would impact any important views within the district. For these reasons, the postwar commercial historic district would continue to be eligible for listing after the Project is completed.

7. Conclusion

In conclusion, the Project would not have a significant impact on the eligible postwar commercial historic district identified by City staff in 2019, which ARG is conservatively treating as a historical resource under CEQA. The Project includes the rehabilitation of a portion of the ground level of the 450 N. Roxbury Drive parking garage for retail use and the addition of glazed retail storefronts in four garage bays facing Roxbury Drive. The office building and parking garage were identified by City staff in 2019 as a contributor to an eligible postwar commercial historic district.

The Project would not materially impair the significance of the subject property or the historic district as a whole. Work proposed under the Project would retain the majority of the original features and materials of the property, and the property would remain potentially eligible as a contributor to the potential postwar commercial district. The significance of the postwar commercial historic district would not be impaired by the Project.

8. Bibliography

American Institute of Architects. *American Architects Directory, 3rd Edition*. New York: R.R. Bowker Company, 1970.

American Institute of Architects. "Reinstatement Application for Norbert Wels Pieper." 1980.

Beverly Hills Historical Society. "Beverly Hills, A Brief History." Accessed February 2024. http://www.beverlyhillshistoricalsociety.org/history.

Black, Marilyn, and Andy Lewis. "A Hollywood Power Lawyer's Lost Memoir on Birthing Independent Film." *The Hollywood Reporter*. April 21, 2016. Accessed February 2024. https://www.hollywoodreporter.com/lifestyle/arts/a-hollywood-power-lawyers-lost-884979/.

California Code of Regulations (Title 14, Division 6, Chapter 3, Sections 15000-15387).

California Office of Historic Preservation. *Technical Assistance Series #1: California Environmental Quality Act (CEQA) and Historical Resources.* Sacramento: California Department of Parks and Recreation, n.d.

California Office of Historic Preservation. *Technical Assistance Series #5: California Register of Historical Resources, The Listing Process.* Sacramento, CA: California Department of Parks and Recreation, n.d.

California Office of Historic Preservation. *Technical Assistance Series #6: California Register and National Register: A Comparison.* Sacramento, CA: California Department of Parks and Recreation, 2001.

California Public Resource Code (Section 21000-21177).

City of Beverly Hills. Historic Preservation Ordinance of the City of Beverly Hills, (Ord. 15-O-2682, eff. 11-19-2015). Beverly Hills Municipal Code 10-3-32, 2015.

City of Beverly Hills Department of Building & Safety. Building Permits, 1969-2024.

City of Beverly Hills Planning Division, Beverly Hills Architectural Commission Report: 450 North Roxbury Drive, April 17, 2019.

City of Los Angeles. "SurveyLA Los Angeles Citywide Historic Context Statement, Context: Architecture and Engineering, 1850-1980, Subcontext: L.A. Modernism, 1919-1980, Subtheme: Corporate International, 1949-1975." Prepared by Daniel Paul for the City of Los Angeles, Department of City Planning, Office of Historic Resources, 2021.

Daily Trojan articles, various dates.

de Wit, Wim and Christopher Alexander. *Overdrive: L.A. constructs the future, 1940-1990.* Los Angeles: Getty Research Institute, 2013.

Gin Wong and Associates. "Ground Floor Entry & Lobby Floor Finish Pattern Plan." Dated 1991, drawing sourced from Lamprecht & Louden, "Historic Resource Assessment: Proposed Façade

Remodeling, 450 North Roxbury Drive." Prepared for the City of Beverly Hills Planning Department, 2019.

"History of the Chamber." *Beverly Hills Chamber of Commerce*. Accessed February 2024. http://www.beverlyhillschamber.com/pages/HistoryoftheChamber.

Johnson Heumann Research Associates. Beverly Hills Historic Resources Survey. Prepared for the City of Beverly Hills, 1985-1986.

Jones & Stokes. City of Beverly Hills Historic Resources Survey Report. Part I: Historic Resources Survey Update and Part II: Area 5: Commercial Property Survey. Prepared for the City of Beverly Hills, 2006-2007.

Los Angeles County Office of the Assessor.

Los Angeles Evening Citizen News articles, various dates.

Los Angeles Times articles, various dates.

Pasadena Independent articles, various dates.

PCR Services Corporation. Historic Resources Survey Report, Part I: Historic Resources Survey Update and Part II: Area 4 Multi-Family Residence Survey. Prepared for the City of Beverly Hills, 2004.

Roderick, Kevin and J. Eric Lynxwiler. *Wilshire Boulevard: Grand Concourse of Los Angeles*. Santa Monica: Angel City Press, 2005.

Sheldon L. Pollack Corp. "Office Building for Kaplan, Livingston, Goodwin, Berkowitz & Selvin." Original Drawing Set from Permit No. 690137, 1969.

United States Department of the Interior, National Park Service. National Register Bulletin 15: *How to Apply the National Register Criteria for Evaluation.* Washington D.C., U.S. Department of the Interior, National Park Service, 1990, revised 1997.

Valley Times articles, various dates.

Wanamaker, Marc. *Early Beverly Hills*. Charleston, SC: Arcadia Publishing, 2005.

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Memorandum

To: Minjee Hahm, Associate Planner
City of Beverly Hills

Date: 04/30/2023

From: Jan Ostashay, Principal OAC

cc: Cindy Gordon, AICP, Principal Planner

Re: PEER REVIEW: Historic Assessment Report - 450 North Roxbury Drive, Beverly Hills

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Overview

At the request of the City of Beverly Hills Community Development Department, Planning Division, Ostashay & Associates Consulting (OAC) has conducted a peer review of a historic resource assessment report prepared for a proposed project at the property referenced above. The historic resource assessment report prepared by Architectural Resources Group (ARG) is entitled *450 North Roxbury Drive Historical Resource Assessment and Project Impacts Analysis* (ARG report) and is dated "April 23, 2024" (hereinafter the consultant report or ARG report).

The ARG consultant report was prepared to determine if any historical resources, as defined by the California Environmental Quality Act (CEQA), are present on or in the vicinity of the project site and, if so, to identify those identified historical resources may be adversely impacted by the proposed project. The consultant report, therefore, evaluated the subject property under applicable statutes and regulations of CEQA and the California Register of Historical Resources (California Register). In addition, the property was also evaluated for potential listing in the National Register of Historic Places (National Register) and the City of Beverly Hills Register of Historic Properties (Local Register).

The consultant report concludes that the subject property does not satisfy the criteria mandates required under Section 10-3-3212 of the City's Historic Preservation Ordinance for designation as a local landmark. The property was also found to be ineligible for inclusion in the National Register and California Register as it did not satisfy any of the necessary significance criteria under those registration programs. However, the property was identified as a potential contributor to an eligible post-war commercial historic district in a Beverly Hills Architectural Commission Report prepared by City Planning staff on April 17, 2019. As such, ARG is conservatively treating the historic district as a historical resource as defined under CEQA.[1] ARG also conducted an analysis of the proposed project to assess its potential to impact the identified historical resource (the potential post-war commercial historic district). ARG concludes that the project would not have a significant impact on the historical resource or the subject property's potential eligibility as a district contributor. In reviewing the ARG report, OAC concurs with the consultant's evaluation findings and impact analysis determination.

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[1] *California Environmental Quality Act (CEQA) Guidelines, Section 15064.5.*

Introduction

Generally, peer reviews of historic resources assessment reports are conducted to reassure lead agencies requesting the assessments that the identification and evaluation efforts performed are adequate, that the eligibility determinations made are logical and well supported, and that the document will, if necessary, facilitate environmental compliance under the provisions of CEQA. Review of historic resources documents for quality control is an essential part of the environmental review process.

As a primer, historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, evaluation, designation, and in certain instances, protection of historic resources. States and local jurisdictions play active roles in the identification, recordation, landmarking, and protection of such resources within their communities.

The National Historic Preservation Act of 1966, as amended, promulgated standardized practices and guidelines for identifying, evaluating, and documenting historic properties (Secretary of the Interior's Standards and Guidelines [Preservation Planning, Identification, and Evaluation]). The State Office of Historic Preservation (OHP) and most local governments in California recognize these practices and guidelines and recommend their use in order to maintain objectivity and consistency in the preparation of historic preservation documents and survey assessments.

Peer Review Assessment

Peer Review Methodology

This peer review addresses the overall acceptability of the ARG consultant report by considering the technical adequacy of the identification and evaluation of historical resources and assessing if the formal findings and conclusion of the project impact analysis are sound and well justified. A review for accuracy, clarity, thoroughness, and understanding of the information provided in the report was also conducted as part of the peer review.

Our process in conducting the peer review included an examination of the consultant report and observation of the project site. We also performed additional research and reviewed building permits, Sanborn fire insurance maps, historic aerial photographs, prior survey assessments of the area, and other primary and secondary sources relevant to the subject property and immediate neighborhood. The following peer review comments are provided in consideration of the historical resource assessment report prepared by ARG to assist in the CEQA review process by the city.

Report Content, Clarity, and Format

In addition to reviewing and assessing evaluation findings and potential project impacts, an essential element of peer reviews is the assessment of the clarity of presentation, the adequacy of the research and context development, the appropriate application of significance criteria, and a thorough understanding of the proposed project for which the report findings and conclusions are based.

Upon reviewing the ARG report, the general content and format of the document appears to be adequately researched, logically formatted, professionally sound, and technically supported. In considering the recognized and accepted standardized practices and guidelines for conducting such assessment work ARG has followed the basic principles with the development of an organized historic context, straightforward property description, introduction of the applicable regulatory framework,

and the reasonable application of federal, state, and local significance criteria. The narrative providing the project description and impact analysis for CEQA purposes also appears sound and technically well supported. In addition, the inclusion of supporting material as attachments to the report aids in understanding the development of the site and immediate area, and further provides evidence to support the assessment evaluation and impact analysis findings.

Evaluation Findings

Previous Evaluations and Studies

The commercial (office) building located at 450 North Roxbury Drive is not listed in the National Register, California Register, or Beverly Hills Local Register. Moreover, the subject property has not been previously identified or assessed in any of the prior city-sponsored surveys and has not been previously evaluated for local, state, or federal level historical significance under any other survey efforts.

However, in a Beverly Hills Architectural Commission Report prepared by City Planning staff dated April 17, 2019, the subject property was noted as a potential eligible historic resource. The report states that "The building appears to be an eligible historic resource as a potential contributor to an eligible post-war commercial historic district…" The report does not provide any specific information related to the boundaries of the district, how or when the district was identified, or under which registration criteria or level of significance (National Register, California Register, or Beverly Hills Local Register) the district is eligible for designation.

Evaluation of Significance

Because the subject property was cited as eligible by City staff as a potential contributor to an eligible post-war commercial historic district in 2019, ARG did not re-evaluate the property for eligibility as a district contributor. Instead, ARG has conservatively treated the subject property as a district contributor for the purposes of the assessment report.

For individual significance, ARG evaluated the subject property against federal, state, and local significance criteria. They concluded that the 450 North Roxbury Drive property appears ineligible for listing in the City of Beverly Hills Local Register, as it did not satisfy the required mandates of the significance criteria (Beverly Hills Municipal Code 10-3-3212). In addition, the property was found ineligible for inclusion in the National Register and California Register due to lack of association with important historical events or trends, architectural merit, and notable personages.

Based on the background research data, photographs, and historical archival material collected and reviewed by OAC in addition to the information and supporting materials provided in the ARG report, OAC concurs with their evaluation of historical significance findings. As such, the subject property appears ineligible for individual listing under any of the federal, state, or local registration programs. OAC also concurs with the ARG approach of conservatively treating the property as a contributor to an eligible post-war commercial historic district and treating the district as a historical resource under CEQA.

CEQA Compliance

Project Summary

As discussed in the ARG report, the proposed project includes the rehabilitation of a portion of the subject property's attached parking garage for use as retail space. Four retail storefronts would be added within the south half of the existing ground level of the parking structure. Four of the garage bays, which are currently infilled along the public sidewalk with original, decorative aluminum screens and raised planters, would be altered to accommodate four glazed storefront assemblies fronting Roxbury Drive. Vehicular entries/exits at the east and west ends of the garage would be retained, as would the parking spaces in the north half of the ground floor level, the two below-ground levels, the second floor above ground level, and the roof level. No changes to the office building itself are proposed under the project.

CEQA Analysis

As the subject property has been identified as a potential contributor to an eligible post-war commercial historic district, the ARG consultant report has conservatively treated the district as a historical resource for the purposes of CEQA.

Under CEQA, a project has the potential to impact a historical resource if the project would result in a "substantial adverse change" to its significance. A substantial adverse change is defined under CEQA as demolition or material alteration in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in or eligibility for listing in a federal, state, and/or local register of historical resources.[2]

ARG has concluded that the scope of work proposed under the project would not cause an adverse impact, as defined under CEQA. The project would not result in the demolition or significant alteration of the office building or the attached garage. No changes would be made to the exterior of the commercial building itself. The project proposes a few exterior changes to the attached parking structure, including removal of the original aluminum screens/panels and raised planters in four bays fronting Roxbury Drive and the installation of four glazed storefront assemblies for retail purposes.

The consultant report also states that the overall height, form, massing, setbacks, design, and majority of the original features and materials of the office building and garage would remain intact upon completion of the project. As such, the subject property would retain those qualities that qualify it as a contributor to the potential post-war commercial historic district, as identified by City staff in the Architectural Commission Report dated April 17, 2019. ARG also concludes that the post-war commercial historic district (the historical resource for CEQA purposes) would continue to be eligible for listing after the project is finished.

Upon consideration of the information in the ARG report and after conducting an independent review of the property and proposed project, OAC concurs with the consultant's determination that for the purposes of CEQA, the commercial building is a contributor to a potential post-war commercial historic district and as such the district is considered a historic resource under the CEQA Guidelines. OAC also concurs with the findings of the ARG report that the project would not result in a substantial adverse impact to the identified historical resource (the post-war commercial historic district) and

[2] *CEQA Guidelines, Section 15064.5 (b).*

would not have a significant effect on the environment. Therefore, no mitigation measures are required for this component of CEQA review.

Conclusion

OAC has completed its peer review of the ARG report as it relates to the historical evaluation of the subject property and the CEQA analysis of the proposed project and potential impacts to the identified historical resource (the post-war commercial historic district) and contributing property. OAC finds there is sufficient information in the consultant's report to evaluate the subject property in proper context and concurs that it is ineligible for listing in the National Register, California Register, and Beverly Hills Local Register. OAC also concurs with ARG's conservative treatment of the subject property as a contributor to a potential post-war commercial historic district and that this district is considered a historical resource pursuant to CEQA.

The proposed project would rehabilitate a portion (ground floor) of the existing multi-level garage for retail use, while retaining the original use and configuration of the extant commercial building and a substantial portion of the existing garage structure for its original purpose. The alterations proposed do not radically change, obscure, or destroy the key features or qualities that define the subject property as a contributor to a potential historic district or the district as a whole.

Based on the analysis in the ARG report and the additional research conducted on the property by OAC, the integrity and historical significance of the subject property and potential historic district would not be materially impaired by the implementation of the proposed project. OAC, therefore, concurs with the conclusionary findings of the ARG report and that the proposed project would not cause a substantial adverse change to the subject property and the potential historic district. The assessment analysis provided in the consultant's report appears sound and justifiably defensible for CEQA review.

ATTACHMENT A

Historical Resource Assessment and Project Impact Analysis Report

450 North Roxbury Drive

Beverly Hills, California

Prepared by:

Architectural Resources Group (ARG)

Los Angeles, CA

Dated: April 23, 2024

[UNDER SEPARATE COVER]

Appendix C

Archaeological Resources Assessment

Kimley»Horn

Archaeological Resources Assessment for the 450 North Roxbury Drive Project in the City of Beverly Hills Los Angeles County, California

Kimley»Horn
Expect More. Experience Better.

Prepared by:

Jessica Mauck, MA, RPA
Jamie Nord, MA, RPA

Kimley-Horn and Associates, Inc.
3801 University Avenue, Suite 300
Riverside, California 92501

September 6, 2024

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ATTACHMENTS

Attachment 1: Sacred Lands File (SLF) Results from the Native American Heritage Commission (NAHC)

1.0 INTRODUCTION

Kimley-Horn and Associates, Inc. (KHA) conducted an Archaeological Resources Assessment for the 450 North Roxbury Drive Project (Project) area located within the City of Beverly Hills (City) in Los Angeles County, California. This study was completed to support the City, as the Lead Agency under the California Environmental Quality Act (CEQA), and their review of potential impacts to archaeological resources as a result of the proposed Project. A literature review and records search were conducted for the property to identify the likelihood of present archaeological resources that would be adversely impacted by the Project. Due to the existing built environment and inability to survey for archaeological resources, the assessment did not include archaeological fieldwork. Potential impacts to historic built environment resources are addressed in *450 N. Roxbury Drive, Historical Resource Assessment and Project Impacts Analysis* prepared in April 2024 by Architectural Resources Group.

1.1 Project Description

The Project is located within the City of Beverly Hills, Los Angeles County, California within Township 1 South and Range 15 West of the USGS Beverly Hills 7.5 minute quadrangle (Figure 1; United States Geological Survey 2022). Specifically, the Project is located at 450 North Roxbury Drive (APN 4343-024-020), which currently contains a high-rise office building and attached parking garage developed in 1970. The Project area is surrounded by a mix of commercial and residential development and is bounded by Santa Monica Boulevard/State Route 2 (SR-2) to the northwest, Bram Goldsmith Way (an alley) to the northeast, North Roxbury Drive to the southwest, and a medical office to the southeast (Figure 2).

The Applicant is requesting a Zone Text Amendment (ZTA) and General Plan Amendment (GPA) to allow an increase in the maximum floor area ratio (FAR) as a result of the conversion of the ground level of an existing parking structure abutting a public street to retail business(es), as defined in Beverly Hills Municipal Code (BHMC) Section 10-3-100, up to a depth of 70 feet from the front property line, subject to approval of a Development Plan Review pursuant to BHMC Section 10-3-3100.[1]

In compliance with the proposed ZTA and GPA, the Project is proposing a conversion of 6,797 square feet of an existing parking structure, resulting in a new total of 103,647 square feet of proposed floor area. Pursuant to BHMC Section 10-3-2745, the maximum allowable floor area for the Project Site is 72,960 square feet. Therefore, the 6,797 square feet conversion is approximately 9.3 percent of the existing building square footage (96,850 square feet) and would be less than 10 percent of the maximum allowable floor area for the site. The Project would remove 29 existing parking spaces (including 24 single parking spaces and 5 tandem parking spaces) on the ground floor and restripe the remaining ground level of parking to replace the 3 removed ADA spaces, which would be relocated to be adjacent to the northeastern end of the proposed retail spaces.

[1] The ZTA and GPA would apply to the entire Business Triangle of the City; however, future projects that would seek to utilize the ZTA and GPA would be subject to environmental review at such time.

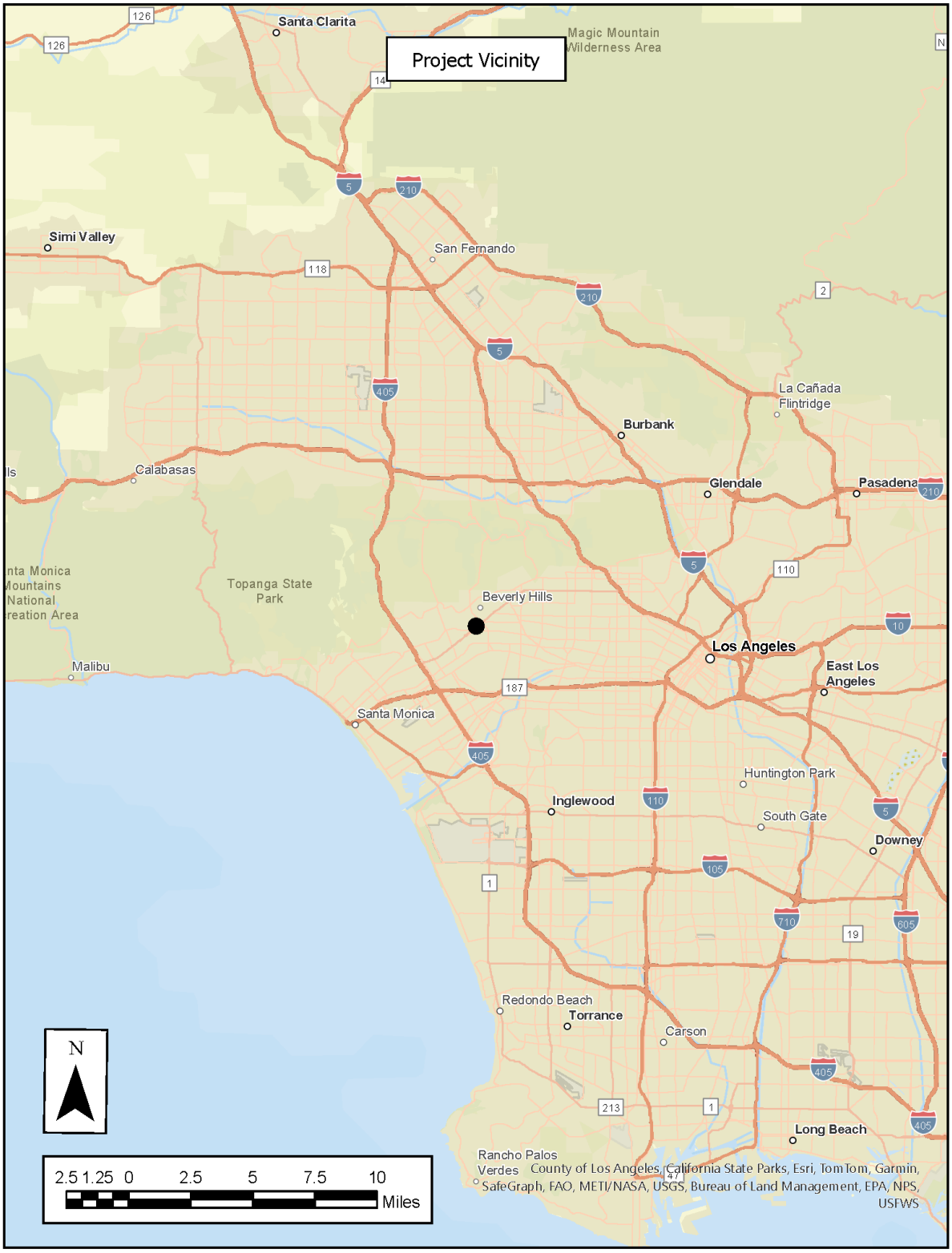

Figure 1: Vicinity Map

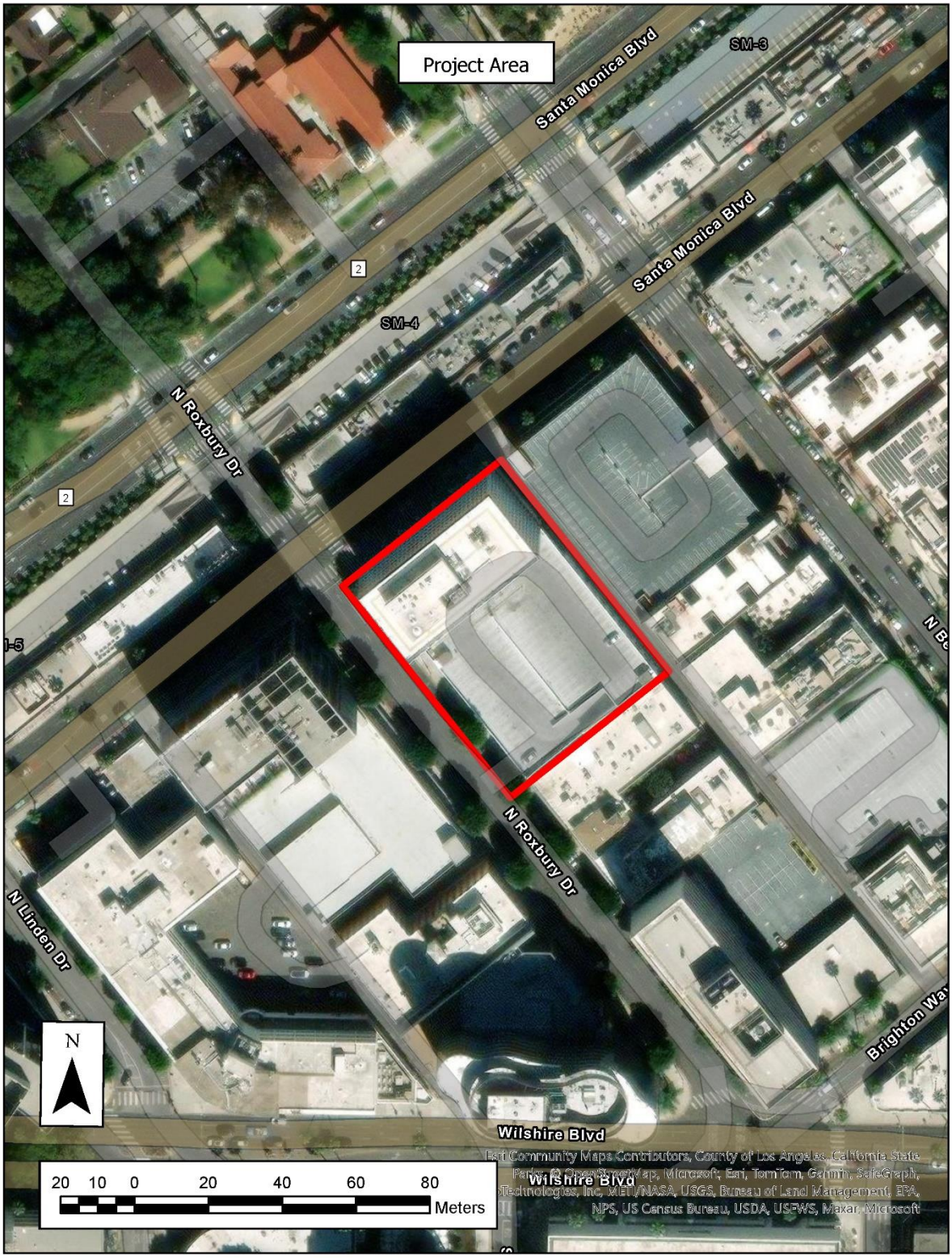

Figure 2: Project Area

1.2 Regulatory Setting

California Environmental Quality Act

CEQA applies to all discretionary projects undertaken or subject to approval by the state's public agencies (California Code of Regulations 14(3), § 15002(i)). Under CEQA, "A project with an effect 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" (Cal. Code Regs. Tit. 14(3), § 15064.5(b)). Guidelines for Implementation of CEQA (CEQA Guidelines) Section 15064.5(a) defines a "historical resource" as a resource that meets one or more of the following criteria:

- Listed in, or eligible for listing in, the California Register of Historical Resources (California Register)
- Listed in a local register of historical resources (as defined at Cal. Public Res. Code § 5020.1(k))
- Identified as significant in a historical resource survey meeting the requirements of § 5024.1(g) of the Cal. Public Res. Code
- Determined to be a historical resource by a project's lead agency (Cal. Code Regs. Tit. 14(3), § 15064.5(a))

A historical resource consists of "Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California…Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources" (Cal. Code Regs. Tit. 14(3), § 15064.5(a)(3)). The significance of a historical resource is impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for the California Register. If an impact on a historical or archaeological resource is significant, CEQA requires feasible measures to minimize the impact (CEQA Guidelines § 15126.4 (a)(1)). Mitigation of significant impacts must lessen or eliminate the physical impact that the project will have on the resource. Section 5024.1 of the Cal. Public Res. Code (PRC) established the California Register. Generally, a resource is considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the California Register (Cal. Code Regs. tit. 14(3), § 15064.5(a)(3)).

Finally, CEQA requires that significant effects on unique archaeological resources be considered and addressed. CEQA defines a unique archaeological resource as any archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA Guidelines Section 15064.5 Appendix G includes significance criteria relative to archaeological and historical resources. These have been utilized as thresholds of significance here, and a project would have a significant environmental impact if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 10564.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 10564.5;
- Disturb any human remains, including those interred outside of formal cemeteries.

California Public Resources Code

California PRC § 5024.1 establishes the California Register of Historical Resources (CRHR). The register lists all California properties considered to be significant historical resources. The CRHR also includes all properties listed or determined eligible for listing in the NRHP, including properties evaluated and determined eligible under § 106.

California PRC § 5020 to 5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the CRHR and is responsible for designating State Historical Landmarks and Historical Points of Interest.

California PRC § 5079 to 5079.65 define the functions and duties of the Office of Historic Preservation, which administers federal- and state-mandated historic preservation programs in California as well as the California Heritage Fund.

California PRC § 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites; identify the powers and duties of the Native American Heritage Commission (NAHC); require that descendants be notified when Native American human remains are discovered; and provide for treatment and disposition of human remains and associated grave goods.

California Health and Safety Code

California Health and Safety Code § 7050.5-7055 govern the process for reporting inadvertent discoveries of human remains to the County Coroner; the process for the County Coroner to report human remains of Native American descent to the NAHC; and the protections offered against removal or desecration of human remains.

California Code of Regulations

The California Code of Regulations govern the nomination of resources to the CRHR (14 California Code of Regulations [CCR] § 4850). The regulations set forth the criteria for eligibility as well as guidelines for assessing historical integrity and resources that have special considerations.

California Register of Historical Resources (CRHR)

The State Historical Resources Commission has designed this program for use by State and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The CRHR is the authoritative guide to the State's significant historical and archeological resources.

The CRHR program encourages public recognition and protection of resources of architectural, historical, archeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under CEQA. To be eligible for listing in the CRHR, a resource must meet at least one of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
- Is associated with the lives of persons important to local, California, or national history.
- Embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.
- Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired or significant individuals made their important contributions. Integrity is the authenticity of a historical resource's physical identity as evidenced by the survival of characteristics or historic fabric that existed during the resource's period of significance. Alterations to a resource or changes in its use over time may change its historical, cultural, or architectural significance. Simply, resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if, under Criterion 4, it maintains the potential to yield significant scientific or historical information or specific data.

Isolated finds, such as a single artifact with no other associated cultural materials, are generally considered to be ineligible for listing in the CRHR. However, the nature of the isolated resource and any available ethnographic data regarding affiliated Native American populations should be carefully considered during the evaluation process, particularly as it relates to potential eligibility under Criterion 4.

California Historical Landmarks

California Historical Landmarks are buildings, structures, sites, or places that have been determined to have statewide historical significance. The resource must be approved for designation by the County Board of Supervisors or the City/Town Council in whose jurisdiction it is located; be recommended by the State Historical Resources Commission; and be officially designated by the Director of California State Parks. A resource must meet at least one of these following criteria:

- Be the first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).
- Be associated with an individual or group having a profound influence on the history of California.
- Be a prototype of, or an outstanding example of, a period, style, architectural movement or construction or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer, or master builder.

California Points of Historical Interest

California Points of Historical Interest are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a landmark and a point. If a point is subsequently granted status as a landmark, the point designation is retired. To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- Be the first, last, only, or most significant of its type within the local geographic region (city or county).
- Be associated with an individual or group having a profound influence on the history of the local area.
- Be a prototype of, or an outstanding example of, a period, style, architectural movement or construction or be one of the more notable works or the best surviving work in the local region of a pioneer architect, designer or master builder.

City of Beverly Hills

The City adopted a Historic Preservation Ordinance (HPO) in 2012, which established the City's Cultural Heritage Commission (CHC), a local register of historic properties, and the various authorities of the CHC and processes under which the inventory, evaluation, and preservation of registered properties is governed. The HPO underwent a comprehensive update in 2016 after a series of public meetings and review by the Planning Commission and CHC.

1.3 Cultural and Natural Setting

The Project area is located within southern portion of Los Angeles County within the Los Angeles Basin. The Los Angeles Basin is a structural depression that is approximately 50 miles long and 20 miles wide that developed as a result of tectonic forces and the San Andreas Fault zone (Ingersoll and Rumelhart 1999; Critelli et al. 1995). Sediments have eroded into the basin from the surrounding mountains since the middle Miocene (13 million years ago), resulting in thousands of feet of sediment accumulation within the Basin. When the sea level dropped during the Pleistocene (2.58 million to 11,700 years ago), the uppermost layers of the Basin then became composed of alluvial sediments (Yerkes et al. 1965). In the present day, the Project area is mapped as being underlain by younger Quaternary alluvium (Qya), though these native soils have been extensively disturbed due to prior development (Campbell et al. 2016). The area, like much of California, contains a unique and diverse climate and environment. This regional diversity provided Native Californians the ability to exploit a range of different plants, animals, and natural resources.

The proposed Project site is located within the ancestral territory of the Gabrieleño/Tongva. Although Alfred Kroeber recorded the territories of southern California tribes in 1925, the ancient territorial borders remain inexact for two reasons: first, territorial boundaries were flexible and, secondly, indigenous borders and land use were not recorded until after European settlements displaced many Native American communities. Although firm and defining borders cannot be known, archaeological, ethnographic, and historic evidence exists to support the prehistoric use by the Gabrieleño/Tongva

(Gabrieleño [Tongva] Band of Mission Indians). It is generally understood that their ancestral territory included the watersheds of the San Gabriel, Santa Ana, and Los Angeles Rivers, portions of the Santa Monica and Santa Ana Mountains, the Los Angeles Basin, the coast from Aliso Creek to Topanga Creek, and San Clemente, San Nicolas, and Santa Catalina Islands.

The Gabrieleño/Tongva have a rich and diverse material culture, traditionally including shell set in asphaltum, carvings, painting, baskets, an extensive steatite industry, and a wide range of stone, shell, and bone materials. At the time of European colonization, they inhabited numerous permanent villages in fertile lowlands along waterways in sheltered areas along the coast, each of which held a population in the low hundreds. Smaller villages were also located at varying distances from these permanent villages, all of which were highly connected via economic, religious, and social ties (Bean and Smith 1978). Villages contained circular and domed homes made of tule mats, fern, or carrizo, as well as small, circular earth-covered sweathouses (Kroeber 1925; Bean and Smith (1978). Their hunting and gathering subsistence strategy included land and offshore efforts that resulted in the take of both small and large land animals, sea mammals, river and ocean fish, and a variety of plant resources. The population sometimes migrated between villages on a temporary basis throughout the year, returning to their permanent villages for ceremony or when resources needed to be replenished (Hudson and Blackburn 1982).

Records show that the long history of European colonization and harmful displacement of Native Americans initially began in 1542 as a result of Juan Rodríguez Cabrillo visiting the area during exploration. Following many subsequent Spanish visits to the region, the colonization of the indigenous population continued in 1769 around the same time as the establishment of Missions San Gabriel in 1771 and San Fernando in 1797. Due in part to the introduction of new diseases, as well as the harsh conditions of mission life, the indigenous population quickly dwindled and cultural practices were lost. Following the secularization of the missions, most surviving Gabrieleño/Tongva became wage laborers on the ranchos of Mexican California, and were later nearly completely wiped out as a result of a smallpox outbreak in the 1860s. The combination of removal, murder, disease, forced labor, and poor diet contributed to the harmful diaspora of the Gabrieleño/Tongva from established villages to scattered areas of the Los Angeles Basin for survival (Bean and Smith 1978). This history of displacement within their own ancestral lands has led to difficulty in attaining federal recognition. However, the 20th century found a revitalization of the Gabrieleño/Tongva people and culture, and though the communities remain unrecognized by the Federal government, they remain a very active people in the Los Angeles area today.

2.0 METHODS

All efforts made for the completion of this report was completed pursuant to requirements set forth in CEQA. This study is intended to identify whether archaeological resources are located within the Project area, whether any present archaeological resources are potentially significant pursuant to the above-referenced regulations and standards, and to develop specific recommendations that will address potential impacts to existing or potential archaeological resources. Tasks completed include:

- A Sacred Lands File (SLF) search through the NAHC, submitted by the City of Beverly Hills,
- A cultural records search through the South Central Coastal Information Center (SCCIC) to identify any studies conducted and/or resources recorded within or adjacent to the Project area,

- Review of geological and historical maps and imagery to identify the archaeological sensitivity of the project area, and
- Development of recommendations and/or mitigation measures for cultural resources identified or potentially unrecorded within the Project area

3.0 RESEARCH

KHA conducted a records search at the SCCIC on June 27, 2024 to identify any previously recorded archaeological resources or previously conducted cultural resources studies within the Project area plus a 0.5 mile buffer (Figure 3). The results of the records search noted that no previous studies have taken place and no resources have been recorded within the Project area. Further, while twenty-four (24) cultural resources studies have been conducted within 0.5 mile of the Project area, no archaeological resources have been recorded within the buffer area. Due to the level of disturbance that occurred across the Los Angeles Basin many decades before the adoption and implementation of archaeological resource-based regulations, it is likely that much of the archaeological landscape within the area was destroyed prior to the ability to document these resources. As such, it is important to review a negative record search result for archaeological resources in this area alongside other information, such as applicable geological information, historical imagery, and the existing level of development for a specific Project area.

As such, a review of available geologic maps, topographic maps, and historic aerial imagery was conducted for the Project area. Geologic maps show that the Project area is underlain by younger Quaternary alluvium (Qya) (Campbell et al.). Human occupation took place in the more recent Holocene era and, as such, younger geologic units such as those within the Project area typically have a moderate-to-high potential for archaeological resources at surface or near surface level. However, historic aerials and topographic maps show that development within the Project area, and therefore, ground disturbance, occurred prior to earliest imagery on file from 1947. Additionally, the Project area looks to have been redeveloped at least once, and currently contains a below-ground garage that expands two levels (Historic Aerials). As a result of this review, it is apparent that the Project area has been subjected to an extensive amount of ground disturbance, including at least 40-50 ft below surface to accommodate a subterranean two-story parking garage.

A SLF search request was submitted to the NAHC by the City of Beverly Hills on June 12, 2024. Results were received on July 2, 2024 noting the results were positive for an SLF within the vicinity of the Project area, and recommended additional outreach be conducted to the Gabrieleño/Tongva San Gabriel Band of Mission Indians (Attachment 1). It is important to note that this repository is not exhaustive and a positive result for only one Native American Tribe does not necessarily indicate the Project area has little to no cultural value to other affiliated Tribes. This type of information, to include whether or not the Project area contains or potentially contains a Tribal Cultural Resource (TCR), as defined by CEQA (as amended, 2014), is most commonly obtained via government-to-government consultation. The City of Beverly Hills will conduct consultation in accordance with CEQA (as amended, 2014) and, as such, the results of consultation and analysis related to whether or not the Project area has potential contain a TCR is not included within this report.

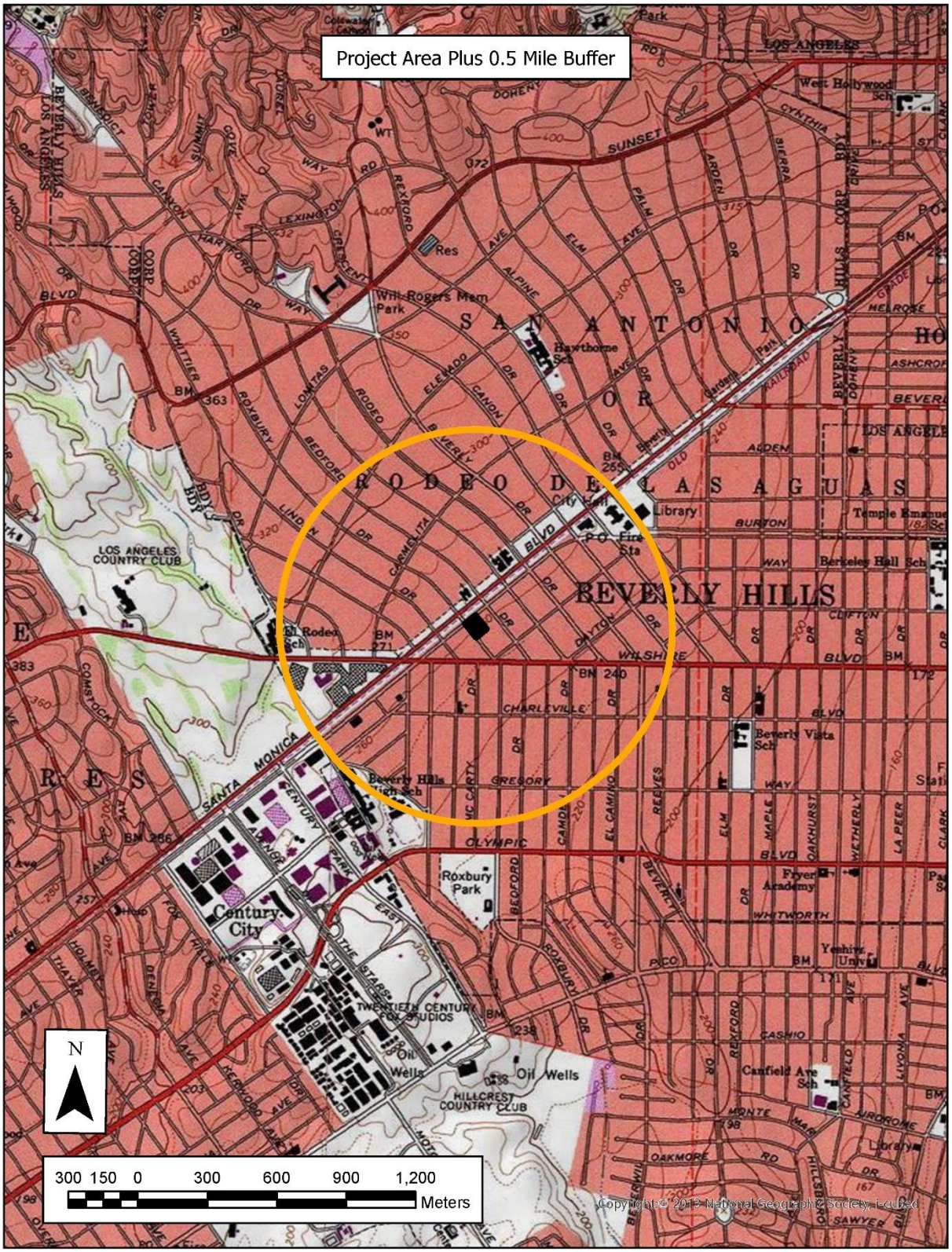

Figure 3: Project Area Plus 0.5 Mile Buffer

4.0 RECOMMENDATIONS

No archaeological resources were identified within the Project area as a result of the records search and associated research. Additionally, it is unlikely that undisturbed archaeological resources are present within the Project area given the extent of prior development. As such, no archaeological resources that meet the definition of "Historical Resources" or "Unique Archaeological Resources", as defined by CEQA, have been identified within the Project area as a result of this study. However, it is important to note that this report does not include discussion related to the presence of TCR, as defined by CEQA (as amended, 2014), as this is determined via government-to-government consultation between the City of Beverly Hills and Native American Tribes. As such, recommendations made within this report as it relates to archaeological resources of Native American origin should be considered alongside the results of Tribal consultation.

Though the report concludes that intact archaeological resources are unlikely to be present within the Project area, conditions of approval should be included that outline the process for treatment of any archaeological resources and/or human remains inadvertently discovered during Project implementation. With such conditions of approval in place, impacts to archaeological resources would be less than significant. An example of such conditions, which may be updated as a result of Tribal consultation, are included below:

1. **Inadvertent Discovery of Archaeological Resources:** In the event that any archaeological resources are encountered during Project implementation, all activities shall immediately cease within 50 feet of the discovery. The applicant shall immediately notify the City and an archaeologist that meets Secretary of Interior (SOI) professional qualifications (Project Archaeologist) who shall evaluate the find in accordance with State and local guidelines and make a recommendation to the City related to the potential significance of the resource. The City shall also contact consulting Native American Tribes regarding any finds of Native American origin to review the potential for the resource as a Tribal Cultural Resource (TCR). If any find is determined to be significant and/or a TCR, the Project Archaeologist shall make recommendations related to avoidance of the resource or, if avoidance is determined to be infeasible by the City, other appropriate treatment measures to minimize impacts to the resource (i.e., data recovery/excavation). Should data recovery/excavation be the chosen treatment for the resource, the City shall confer with the Project Archaeologist and, for resources of Native American origin, consulting Tribes to identify final disposition (i.e., reburial, curation, etc.). All agreed upon treatment activities will be overseen by the Project Archaeologist and, for resources of Native American origin, by representatives of consulting Tribes who wish to place a monitor on site for these efforts. The Project Archaeologist shall draft a report that speaks to the discovery, recordation, evaluation, treatment, and final disposition of the resource and submit the draft to the City for review. All documents related to the resource shall be submitted to the City and the South Central Coastal Information Center (SCCIC) once finalized.
2. **Inadvertent Discovery of Human Remains.** In the event that human remains are identified during project implementation, all activities shall halt immediately within 100 feet of the discovery and all actions outlined within California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98 shall be followed. This includes immediate

notification to the County Coroner, who will be responsible for identifying if the remains are related to criminal activity or if they are of Native American origin. If the remains are determined to be Native American, the County Coroner shall contact the Native American Heritage Commission within 24 hours, who will then designate and contact a Most Likely Descendant (MLD). The MLD has 48 hours to visit the site of discovery and make recommendations to the landowner related to appropriate disposition. Should the landowner and MLD disagree on disposition, the matter may be mediated by the NAHC. Should mediation fail, the landowner is required to reinter the remains with appropriate dignity on the property in a location that will not be subject to further disturbance.

REFERENCES

Bean, Lowell John, and Charles R. Smith. 1978. Gabrielino. *In* Handbook of North American Indians, Vol. 8, California. William C. Sturtevant, gen. ed., Robert F. Heizer, vol. ed. Washington: Smithsonian Institution.

Critelli, S. P. Rumelhart, and Ingersoll, R. 1995. Petrofacies and provenance of the Puente Formation (middle to upper Miocene), Los Angeles Basin, southern California: implications for rapid uplift and accumulation rates. Journal of Sedimentary Research A65: 656-667.

Campbell, R.H., Wills, C.J., Irvine, P.J., and B.J. Swanson. 2016. Preliminary geologic map of the Los Angeles 30' X 60' quadrangle, California. 1:100,000. Preliminary Geologic Maps PGM-13-06.2016.

Gabrieleño (Tongva) Band of Mission Indians Government Website. https://www.gabrieleno-nsn.us/maps. Accessed June 27, 2024.

Historic Aerials. https://www.historicaerials.com/viewer. Accessed June 30, 2024

Hudson, Travis, and Blackburn, Thomas C. 1982. The Material Culture of the Chumash Interaction Sphere, Volume III: Clothing, Ornamentation, and Grooming. Ballena Press Anthropological Papers, No. 28.

Ingersoll, R. V. and P. E. Rumelhart. 1999. Three-stage basin evolution of the Los Angeles basin, southern California. Geology 27: 593-596.

Kroeber, Alfred L. 1925. *Handbook of the Indians of California.* Bureau of American Ethnology Bulletin No. 78. Washington D.C.: Smithsonian Institution. Reprinted in 1976, New York: Dover.

United States Geological Survey. 2022. *Beverly Hills, California* 7.5-minute topographic quadrangle map.

Yerkes, R.F., T.H. McCulloh, J.E. Schollhamer, and J.G. Vedder. 1965. Geology of the Los Angeles Basin: an introduction. Geological Survey Professional Paper 420-A.

ATTACHMENT 1

Sacred Lands File (SLF) Results from the Native American Heritage Commission (NAHC)

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Laurena Bolden
Serrano

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of Luiseño Indians

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NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

July 2, 2024

Cindy Gordon
City of Beverly Hills

Via Email to: cgordon@beverlyhills.org

Re: Native American Consultation, Pursuant to Senate Bill 18 (SB18), Government Codes §65352.3 and §65352.4, as well as Assembly Bill 52 (AB52), Public Resources Codes §21080.1, §21080.3.1 and §21080.3.2, 450 N. Roxbury - Parking-to-Retail Conversion Project, Los Angeles County

To Whom It May Concern:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties or projects.

Government Codes §65352.3 and §65352.4 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans.

Public Resources Codes §21080.3.1 and §21080.3.2 requires public agencies to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to tribal cultural resources as defined, for California Environmental Quality Act (CEQA) projects.

The law does not preclude local governments and agencies from initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction. The NAHC believes that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

Best practice for the AB52 process and in accordance with Public Resources Code §21080.3.1(d), is to do the following:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The NAHC also recommends, but does not require that lead agencies include in their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential affect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

    - A listing of any and all known cultural resources have already been recorded on or adjacent to the APE, such as known archaeological sites;
    - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
    - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the APE; and
    - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

    - Any report that may contain site forms, site significance, and suggested mitigation measures.

      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 in accordance with Government Code Section 6254.10.

3. The result of the Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was positive. Please contact the Gabrieleno/Tongva San Gabriel Band of Mission Indians on the attached list for more information.

4. Any ethnographic studies conducted for any area including all or part of the potential APE; and

5. Any geotechnical reports regarding all or part of the potential APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS is not exhaustive, and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event, that they do, having the information beforehand well help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance we can assure that our consultation list remains current.

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

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Appendix D

Energy Calculations

Kimley»Horn

Construction Fuel Consumption

On-Site Diesel[1] (off-road construction Equipment)	$MTCO_2e$	Gallons of Fuel[4]	County Fuel in 2025 (Start of Construction)	Percent
Demolition	9	879		
Building Construction	155	15,254		
Architectural Coating	1	120		
Total	165	16,252	532,570,627	0.00305%
Off-Site Diesel[1] (on-road construction trips)				
Demolition	0	45		
Building Construction	4	429		
Architectural Coating	0	0		
Total	5	475	532,570,627	0.00009%
Off-Site Gasoline[2]				
Demolition	1	160		
Building Construction	3	393		
Architectural Coating	0	6		
Total	5	558	3,536,229,368	0.00002%
Total Diesel Fuel	16,727	16,727	532,570,627	0.00314%
Total Gasoline Fuel	558	558	3,536,229,368	0.00002%
Total Construction Fuel	175	17,286	4,068,799,996	0.00316%

Construction Phase[3]	Demolition			Building Construction			Architectural Coating		
	On-Site Diesel (Off-Road)	Off-Site Diesel (Hauling/Vendor)	Off-Site Gasoline (Worker)	On-Site Diesel (Off-Road)	Off-Site Diesel (Hauling/Vendor)	Off-Site Gasoline (Worker)	On-Site Diesel (Off-Road)	Off-Site Diesel (Hauling/Vendor)	Off-Site Gasoline (Worker)
2025	8.92	0.46	1.41	141.68	3.99	3.17	0.00	0.00	0.00
2026	0.00	0.00	0.00	13.15	0.36	0.29	1.22	0.00	0.05
Total	**8.92**	**0.46**	**1.41**	**154.82**	**4.36**	**3.46**	**1.22**	**0.00**	**0.05**

Notes:

[1] Fuel used for off-road, hauling, and vendor trips assumed to be diesel.

[2] Fuel used for worker trips assumed to be gasoline.

[3] $MTCO_2e$ rates from CalEEMod (3.0 Construction Emission Details).

[4] For CO2e emissions, see Chapter 13 (page 94); Conversion Ratios: Climate Registry, General Reporting Protocol, 2022.

Operational Fuel

UNMITIGATED							
Vehicle Type	**Percent**	**Annual VMT[1]**	**MPG[2]**	**Annual Fuel (Gallons)**	**Fuel Type**	**Los Angeles County Gallons (2026)[3]**	**RS Percent**
Passenger Cars	94.2%	858,115	21.6	39,728	Gas	3,446,400,365	0.00115%
Light/Medium Trucks	4.9%	44,745	17.2	2,601	Diesel	535,038,344	0.00049%
Heavy Trucks/Other	0.9%	7,983	6.1	1,309	Diesel	535,038,344	0.00024%
Total	1.00	910,843		3,910			0.00073%

Land Use[5]	**LDA**	**LDT1**	**LDT2**	**MCY**	**MDV**	**LHD1**	**LHD2**	**MHD**	**OBUS**	**UBUS**	**SBUS**	**MH**	**HHD**
Strip Mall	0.499	0.0431	0.2362	0.0217	0.1418	0.0265	0.0067	0.0109	0.0009	0.0006	0.0006	0.0028	0.0088
Other Asphalt Surfaces	0.499	0.0431	0.2362	0.0217	0.1418	0.0265	0.0067	0.0109	0.0009	0.0006	0.0006	0.0028	0.0088

Notes:

[1] Total annual operational VMT based on annual VMT from CalEEMod (5.9 Operational Mobile Sources).

[2] Average fuel economy derived from Department of Transportation.

[3] Total annual county fuel per EMFAC 2021 model of projected operational fuel usage.

Operational Water Energy

UNMITIGATED		
Unmitigated Indoor	0.5	million gallons
Indoor Energy Intensity Factor[1]	6,807	kWh/MG
Unmitigated Outdoor	0	million gallons
Outdoor Energy Intensity Factor[2]	5,306	kWh/MG
Operational Water Energy	3,427	kWh
Operational Water Energy	0.003	GWh
Los Angeles County Annual Electricity	68,485	GWh
Percentage Increase	0.00001%	

Land Use[3]	Unmitigated (gal/year)	
	Indoor	Outdoor
Strip Mall	503471	0
Other Asphalt Surfaces	-	-
Total Operational Water (MG/year)	**0.503**	**0.000**

Notes:

[1] Indoor water energy intensity factor for South Coast subarea per CalEEMod User Guide, Appendix G, Tab G-32. Factor includes supply, treatment, distribution, and wastewater.

[2] Outdoor water energy intensity factor for South Coast subarea per CalEEMod User Guide, Appendix G, Tab G-32. Factor includes supply, treatment, and distribution.

[3] Operational water use values per CalEEMod (5.12 Operational Water and Wastewater Consumption).

Elecricity/Natural Gas Energy

UNMITIGATED			
	Unmitigated Project Annual Energy	Los Angeles County Annual Energy[3]	Percentage Increase
Electricity (kWh/yr)	67,675	68,484,956,280	0.0001%
Electricity (GWh/yr)	0.068	68,485	0.00010%
Natural Gas (kBTU/yr)	33,469	282,029	11.867%
Natural Gas (therms/yr)	335	2,820,285,935	0.00001%

Land Use	Electricity[1] (kWh/yr)	Natural Gas[2] (kBTU/yr)
	Unmitigated	Unmitigated
Strip Mall	67675	33469
Other Asphalt Surfaces	0	0
Total Energy	**67,675**	**33,469**

Notes:

[1] Electricity use per CalEEMod (5.11 Operational Energy Consumption).

[2] Natural Gas use per CalEEMod (5.11 Operational Energy Consumption).

[3] County total energy values from California Energy Commission energy reports available through ecdms.energy.ca.gov. (year 2022)

Appendix E

Greenhouse Gas Emissions Assessment

Kimley»Horn

Greenhouse Gas Emissions Assessment
450 North Roxbury Drive Project
City of Beverly Hills, California

Prepared by:

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213.261.4040

September 2024

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APPENDIX
Appendix A: Greenhouse Gas Emissions Data

LIST OF ABBREVIATED TERMS

AB	Assembly Bill
CARB	California Air Resource Board
CCR	California Code of Regulations
CalEEMod	California Emissions Estimator Model
CEQA	California Environmental Quality Act
CalGEM	California Geologic Energy Management Division
CALGreen	California Green Building Standards
CH_4	methane
CPUC	California Public Utilities Commission
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CFC	Chlorofluorocarbon
FCAA	Federal Clean Air Act
Gt	gigatons
GHG	greenhouse gas
HCFC	Hydrochlorofluorocarbon
HFC	Hydrofluorocarbon
HVAC	heating, ventilation, and air-conditioning
ITE	Institute of Transportation Engineers
LCFS	Low Carbon Fuel Standard
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
mpg	miles per gallon
$MTCO_2e$	metric tons of carbon dioxide equivalent
NHTSA	National Highway Traffic Safety Administration
NF_3	nitrogen trifluoride
N_2O	nitrous oxide
OPR	Office of Planning and Research
PFC	Perfluorocarbon
RPS	Renewable Portfolio standards
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAG	Southern California Association of Government
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SF	square feet or square foot
SF_6	sulfur hexafluoride
TACs	toxic air contaminants
U.S. EPA	U.S. Environmental Protection Agency
ZEV	zero emission vehicle

1 INTRODUCTION

This report documents the results of a Greenhouse Gas (GHG) Emissions Assessment for the 450 N. Roxbury Drive Project (Project) located at 450 North Roxbury Drive (Project Site). The purpose of this GHG Emissions Assessment is to evaluate potential Project construction and operational emissions and determine the level of impact the Project would have on the environment.

1.1 Project Location and Setting

The Project would redevelop a 6,797 square foot portion of the ground floor of a five-floor, partially subterranean parking garage (the upper two levels are above ground) with rooftop parking located on a 0.8-acre parcel (Assessor's Parcel Number [APN] 4343-024-020) (Project Site); see **Figure 1: Local Vicinity Map**. The five-floor parking garage is attached to a 10-story, 155-foot-tall office building located on the northern portion of the same parcel, constructed in 1970. The parking garage and office building together are considered the Project Site; however, the remainder of the parking garage and the attached office building would not be redeveloped as part of this Project. The Project Site is bound by Santa Monica Boulevard to the north, Bram Goldsmith Way (an alley) to the east, an existing commercial building to the south, and North Roxbury Drive to the west. The Project Site is in the southwestern portion of the City, in Los Angeles County (County), approximately 3.0 miles north of Culver City and 8.5 miles west of downtown Los Angeles; see **Figure 2: Regional Vicinity Map**.

Public transit access in proximity to the Project Site includes the Los Angeles County Metropolitan Transportation Authority (Metro) Line 20 bus stop at the intersection of Wilshire Boulevard and North Linden Drive, located approximately 400 feet southwest of the Project Site; the Metro Line 4 bus stop at the intersection of Santa Monica Boulevard and North Camden Drive, located approximately 600 feet northeast of the Project Site; and the Metro Line 720 bus stop at the intersection of Wilshire Boulevard and Santa Monica Boulevard, located approximately 740 feet southwest of the Project Site. The Project Site is also approximately 0.31 miles northwest of the future Metro D Line Wilshire/Rodeo Station, which slated to open in 2026.[1] Pursuant to SCAG's 2024 Regional Transportation Plan, the Metro Line 720 bus stop at the intersection of Wilshire Boulevard and Santa Monica Boulevard and future Metro D Line Wilshire/Rodeo Station are each designated a "Major Transit Stop" as defined by Public Resources Code Section 21064.3.[2]

1.2 Project Description

The Project would convert a portion of the ground level of the existing parking garage to approximately 6,797 square feet of retail uses, split into four retail spaces ranging from 1,397 square feet to 1,841 square feet. The retail spaces would be accessed from the North Roxbury Drive street frontage. Storefront facades would consist of louvers, cast-in-place (CIP) concrete, and storefront glazing, with signage installed on top. Approximately 300 square feet of planter area would also be added; see **Figure 3: Conceptual Site Plan**.

[1] Los Angeles County Metropolitan Transportation Authority (Metro), Westside Purple Line Extension Section 2 Project December 2023 Quarterly Project Status Report, 2023, libraryarchives.metro.net/DPGTL/StatusReports/2023-december-westside-purple-line-extension-section-2.pdf. Accessed June 10, 2024.

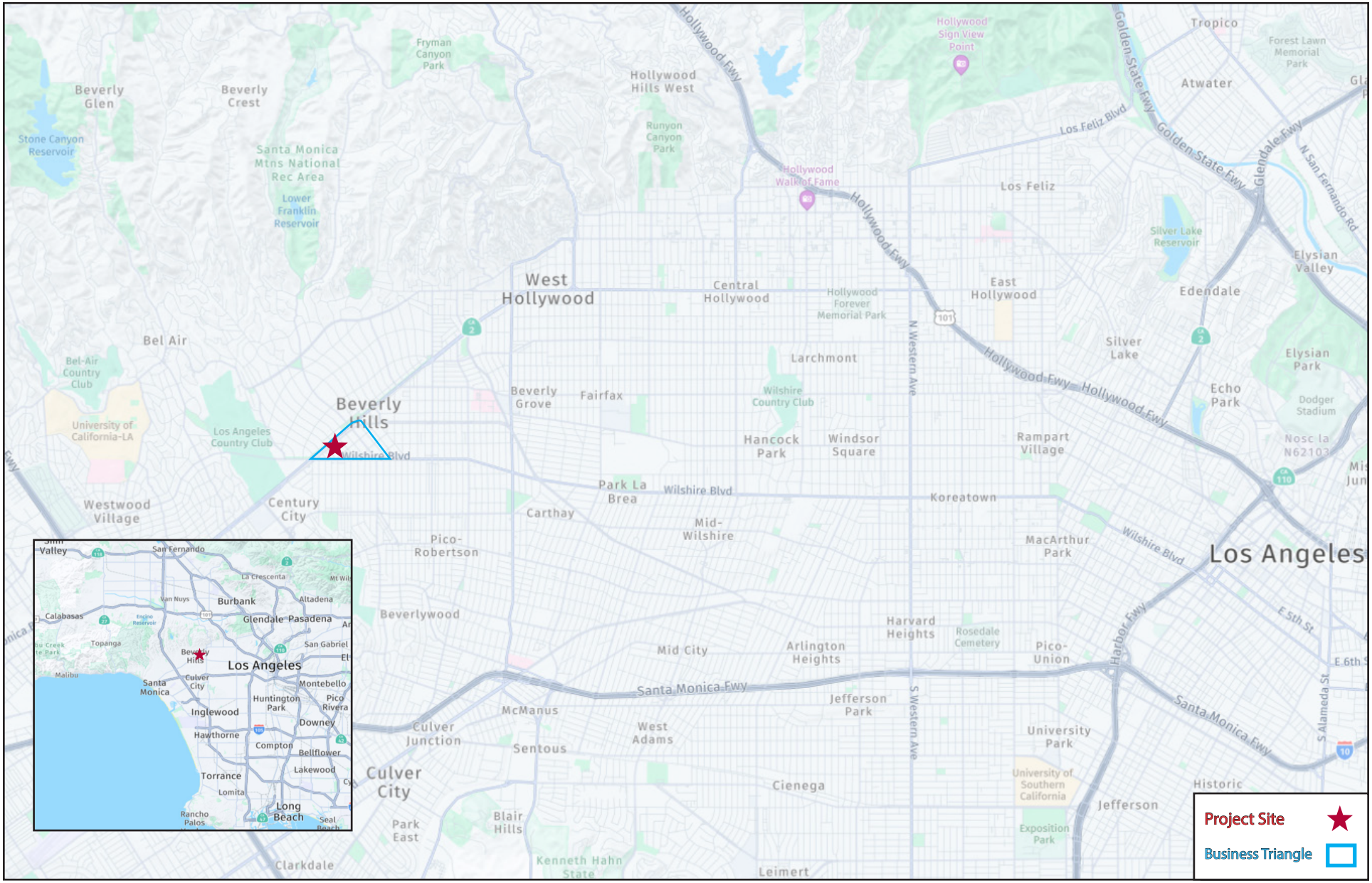
[2] Southern California Association of Governments, Connect SoCal 2024: The 2024 Regional Transportation Plan/Sustainable Communities Strategy, Local Data Exchange (LDX) Process Data/Map Book for the City of Beverly Hills, page 44. https://scag.ca.gov/sites/main/files/file-attachments/p0222-beverly-hills.pdf?1655312455. Accessed July 3, 2024.

SOURCE: Google Earth, 2024

FIGURE 1: Local Vicinty Map

450 NORTH ROXBURY DRIVE PROJECT

Kimley»Horn

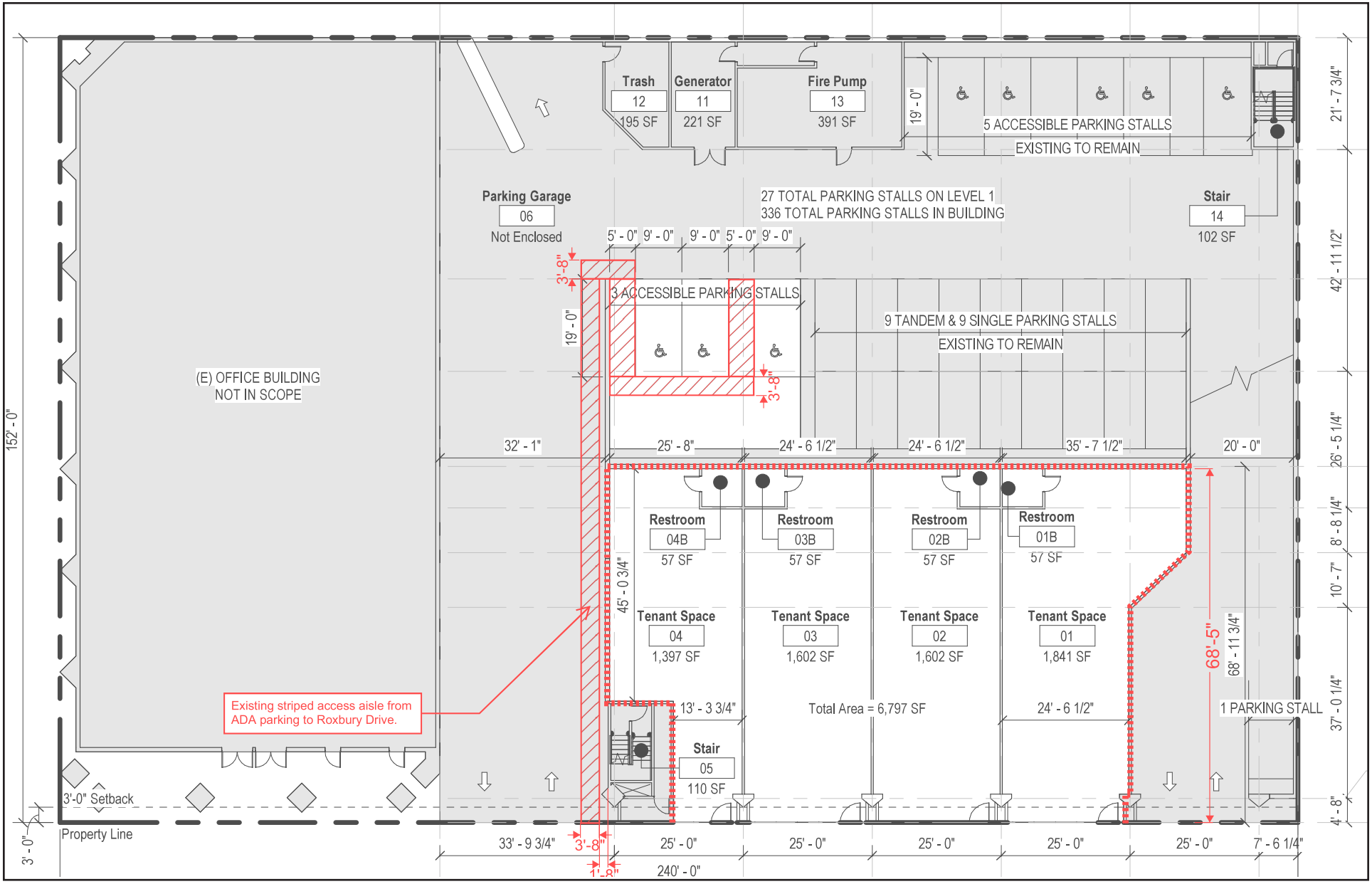


SOURCE: Nearmap, 2024

FIGURE 2: Regional Vicinty Map

450 NORTH ROXBURY DRIVE PROJECT

Kimley»Horn



SOURCE: HLW International LLP, 2024

FIGURE 3: Conceptual Site Plan

450 NORTH ROXBURY DRIVE PROJECT

Kimley»Horn

The Applicant is requesting a Zone Text Amendment (ZTA) and General Plan Amendment (GPA) to allow an increase in the maximum FAR as a result of the conversion of the ground level of an existing parking structure abutting a public street to retail business(es), as defined in Beverly Hills Municipal Code (BHMC) Section 10-3-100, up to a depth of 70 feet from the front property line, subject to approval of a Development Plan Review pursuant to BHMC Section 10-3-3100.[3] In compliance with the proposed ZTA and GPA, the Project is proposing a conversion of 6,797 square feet of an existing parking structure, resulting in a new total of 103,647 square feet of proposed floor area. Pursuant to BHMC Section 10-3-2745, the maximum allowable floor area for the Project Site is 72,960 square feet. Therefore, the 6,797 square feet conversion is approximately 9.3 percent of the existing building square footage (96,850 square feet) and would be less than 10 percent of the maximum allowable floor area for the site.

The Project would remove 29 existing parking spaces (including 24 single parking spaces and five tandem parking spaces) on the ground floor and restripe the remaining ground level of parking to replace the 3 ADA spaces, which would be relocated to be adjacent to the northeastern end of the proposed retail spaces. Vehicular access to the Project Site would continue to be provided via the two existing in/out driveways on North Roxbury Drive. Pedestrian access would continue to be provided via the existing sidewalk along North Roxbury Drive. The Project would not modify the existing driveways and sidewalk.

A new mechanical split heating, ventilation, and air conditioning (HVAC) system would be installed above the ceilings of the retail spaces. A new rooftop HVAC unit would be provided immediately south of an existing HVAC unit on the rooftop of the parking garage. The Project would also install four 5-ton heat pump condensers along the western edge of the rooftop. An automated sprinkler system would also be installed within the retail spaces for fire protection purposes, including a fire pump on the eastern portion of the Project Site.

Project construction would include the demolition of the existing building façade, flooring, and planters, building construction, and architectural coatings. Demolition activities would require the use of haul trucks. No grading or excavation will be required to construct this Project. Project construction is anticipated to begin as early as January 2025 and would be completed as early as February 2026. Construction of the Project is estimated to require approximately 14 months.

[3] The ZTA and GPA would apply to the entire Business Triangle of the City; however, future projects that would seek to utilize the ZTA and GPA would be subject to environmental review at such time.

2 ENVIRONMENTAL SETTING

2.1 Greenhouse Gases and Climate Change

Certain gases in the earth's atmosphere classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. A portion of the radiation is absorbed by the earth's surface and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. Because the earth has a much lower temperature than the sun, it emits lower-frequency radiation. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

The primary GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Fluorinated gases also make up a small fraction of the GHGs that contribute to climate change. Examples of fluorinated gases include chlorofluorocarbons (CFCs), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3); however, it is noted that these gases are not associated with typical land use development. Human-caused emissions of GHGs exceeding natural ambient concentrations are believed to be responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of a GHG molecule is dependent on multiple variables and cannot be pinpointed, more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms of carbon sequestration. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere.[4] **Table 1: Description of Greenhouse Gases** describes the primary GHGs attributed to global climate change, including their physical properties.

[4] Intergovernmental Panel on Climate Change, *Carbon and Other Biogeochemical Cycles. In: Climate Change 2013: The Physical Science Basis*, *Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2013, www.ipcc.ch/site/assets/uploads/2018/02/WG1AR5_all_final.pdf. Accessed July 8, 2024.

Table 1: Description of Greenhouse Gases

Greenhouse Gas	Description
Carbon Dioxide (CO_2)	CO_2 is a colorless, odorless gas that is emitted naturally and through human activities. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic sources are from burning coal, oil, natural gas, and wood. The largest source of CO_2 emissions globally is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. The atmospheric lifetime of CO_2 is variable because it is readily exchanged in the atmosphere. CO_2 is the most widely emitted GHG and is the reference gas (Global Warming Potential [GWP] of 1) for determining GWP for other GHGs.
Nitrous Oxide (N_2O)	N_2O is largely attributable to agricultural practices and soil management. Primary human-related sources of N_2O include agricultural soil management, sewage treatment, combustion of fossil fuels, and adipic and nitric acid production. N_2O is produced from biological sources in soil and water, particularly microbial action in wet tropical forests. The atmospheric lifetime of N_2O is approximately 120 years. The GWP of N_2O is 298.
Methane (CH_4)	CH_4, a highly potent GHG, primarily results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Methane is the major component of natural gas, about 87 percent by volume. Human-related sources include fossil fuel production, animal husbandry, rice cultivation, biomass burning, and waste management. Natural sources of CH_4 include wetlands, gas hydrates, termites, oceans, freshwater bodies, non-wetland soils, and wildfires. The atmospheric lifetime of CH_4 is about 12 years and the GWP is 25.
Hydrofluorocarbons (HFCs)	HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of CFCs and HCFCs gains momentum. The 100-year GWP of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Two main sources of PFCs are primary aluminum production and semiconductor manufacturing. GWP range from 6,500 to 9,200.
Chlorofluorocarbons (CFCs)	CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. They are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the earth's surface). CFCs were synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited their production in 1987. GWP for CFCs range from 3,800 to 14,400.
Sulfur Hexafluoride (SF_6)	SF_6 is an inorganic, odorless, colorless, and nontoxic, nonflammable gas. It has a lifetime of 3,200 years. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas. The GWP of SF_6 is 23,900.
Hydrochlorofluoro-carbons (HCFCs)	HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, HCFCs are subject to a consumption cap and gradual phase out. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year GWP of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.
Nitrogen Trifluoride (NF_3)	NF_3 was added to Health and Safety Code section 38505(g)(7) as a GHG of concern. This gas is used in electronics manufacture for semiconductors and liquid crystal displays. It has a high GWP of 17,200.

Source: Compiled from U.S. EPA, *Overview of Greenhouse Gases*, www.epa.gov/ghgemissions/overview-greenhouse-gases; U.S. EPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016*, 2018; Intergovernmental Panel on Climate Change, *Climate Change 2007: The Physical Science Basis*, 2007; National Research Council, *Advancing the Science of Climate Change*, 2010; U.S. EPA, *Methane and Nitrous Oxide Emission from Natural Sources*, April 2010.

3 REGULATORY SETTING

3.1 Federal

To date, national standards have not been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

U.S. Environmental Protection Agency Endangerment Finding

The U.S. Environmental Protection Agency (U.S. EPA) authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Federal Clean Air Act (FCAA) and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the U.S. EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing FCAA and the U.S. EPA's assessment of the scientific evidence that form the basis for the U.S. EPA's regulatory actions.

Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, Executive Order 13432 was issued in 2007 directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the U.S. EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, an Executive Memorandum was issued directing the Department of Transportation, Department of Energy, U.S. EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the U.S. EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking. On January

12, 2017, the U.S. EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks. It should be noted that the U.S. EPA is currently proposing to freeze the vehicle fuel efficiency standards at their planned 2020 level (37 miles per gallon [mpg]), canceling any future strengthening (currently 54.5 mpg by 2026).

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the U.S. EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO_2 emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.[5]

On September 27, 2019, the U.S. EPA and the NHTSA published the "*Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program*" (84 Fed. Reg. 51,310 (Sept. 27, 2019).[6] The SAFE Rule (Part One) revoked California's authority to set its own GHG emissions standards and set zero-emission vehicle (ZEV) mandates in California. On March 31, 2020, the U.S. EPA and NHTSA finalized rulemaking for SAFE Part Two sets CO_2 emissions standards and corporate average fuel economy (CAFE) standards for passenger vehicles and light duty trucks, covering model years 2021-2026. The current U.S. EPA administration has repealed SAFE Rule Part One, effective January 28, 2022 and is reconsidering Part Two.

In December 2021, the U.S. EPA finalized federal GHG emissions standards for passenger cars and light trucks for Model Years 2023 through 2026. These standards are the strongest vehicle emissions standards ever established for the light-duty vehicle sector and are based on sound science and grounded in a rigorous assessment of current and future technologies. The updated standards will result in avoiding more than three billion tons of GHG emissions through 2050.[7]

3.2 State

California Air Resources Board

The California Air Resources Board (CARB) is responsible for coordination and oversight of state and local air pollution control programs. Various statewide and local initiatives to reduce California's contribution to GHG emissions have raised awareness about climate change and its potential for severe long-term adverse environmental, social, and economic effects. California is a significant emitter of CO_2 equivalents (CO_2e) in the world and produced 459 gross million metric tons of carbon dioxide equivalent ($MMTCO_2e$) in 2013. The transportation sector is the State's largest emitter of GHGs, followed by industrial operations such as manufacturing and oil and gas extraction.

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[5] U.S. EPA and NHTSA, *Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles – Phase 2*, 2016, www.gpo.gov/fdsys/pkg/FR-2016-10-25/pdf/2016-21203.pdf. Accessed July 8, 2024.

[6] U.S. EPA and NHTSA, Federal Register, Vol. 84, No. 188, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program, September 27, 2019, www.govinfo.gov/content/pkg/FR-2019-09-27/pdf/2019-20672.pdf. Accessed July 8, 2024.

[7] U.S. EPA, *Final Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026*, 2021, www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-revise-existing-national-ghg-emissions. Accessed July 8, 2024.

The State's legislature enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark Assembly Bill (AB) 32, *California Global Warming Solutions Act of 2006*, was specifically enacted to address GHG emissions. Other legislation, such as Title 24 building efficiency standards and Title 20 appliance energy standards, were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the legislation's major provisions.

Assembly Bill 32 (California Global Warming Solutions Act of 2006)
AB 32 instructs the CARB to develop and enforce regulations for reporting and verification of Statewide GHG emissions. AB 32 also directed CARB to set a GHG emissions limit based on 1990 levels, to be achieved by 2020. It set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

California Air Resource Board Scoping Plan
CARB adopted the Scoping Plan to achieve AB 32 goals. The Scoping Plan establishes an overall framework for the measures that would be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emissions level would require a reduction of GHG emissions of approximately 29 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as "business-as-usual").[8] The Scoping Plan evaluates opportunities for sector-specific reductions, integrates early actions and additional GHG reduction measures by both CARB and the State's Climate Action Team, identifies additional measures to be pursued as regulations, and outlines the adopted role of a cap-and-trade program.[9] Additional development of these measures and adoption of the appropriate regulations occurred through the end of 2013. Key Scoping Plan elements include:

- Expanding and strengthening existing energy efficiency programs, as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent by 2020.
- Developing a California cap-and-trade program that links with other programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions (adopted in 2011).
- Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets (several sustainable community strategies have been adopted).
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, heavy-duty truck measures, the Low Carbon Fuel Standard (amendments to the Pavley Standard adopted 2009; Advanced Clean Car standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (adopted 2009).
- Creating targeted fees, including a public goods charge on water use, fees on gasses with high global warming potential, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

[8] CARB defines business-as-usual (BAU) in its Scoping Plan as emissions levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. Projections for each emission-generating sector were compiled and used to estimate emissions for 2020 based on 2002–2004 emissions intensities. Under CARB's definition of BAU, new growth is assumed to have the same carbon intensities as was typical from 2002 through 2004.

[9] The Climate Action Team, led by the secretary of the California Environmental Protection Agency, is a group of State agency secretaries and heads of agencies, boards, and departments. Team members work to coordinate statewide efforts to implement global warming emissions reduction programs and the State's Climate Adaptation Strategy.

- The California Sustainable Freight Action Plan was developed in 2016 and provides a vision for California's transition to a more efficient, more economically competitive, and less polluting freight transport system. This transition of California's freight transport system is essential to supporting the State's economic development in coming decades while reducing pollution.
- CARB's Mobile Source Strategy demonstrates how the State can simultaneously meet air quality standards, achieve GHG emission reduction targets, decrease health risk from transportation emissions, and reduce petroleum consumption over the next fifteen years. The mobile Source Strategy includes increasing zero emission vehicles (ZEV) buses and trucks.

In 2012, CARB released revised estimates of the expected 2020 emissions reductions. The revised analysis relied on emissions projections updated in light of current economic forecasts that accounted for the economic downturn since 2008, reduction measures already approved and put in place relating to future fuel and energy demand, and other factors. This update reduced the projected 2020 emissions from 596 $MMTCO_2e$ to 545 $MMTCO_2e$. The reduction in forecasted 2020 emissions means that the revised business-as-usual reduction necessary to achieve AB 32's goal of reaching 1990 levels by 2020 is now 21.7 percent, down from 29 percent. CARB also provided a lower 2020 inventory forecast that incorporated State-led GHG emissions reduction measures already in place. When this lower forecast is considered, the necessary reduction from business-as-usual needed to achieve the goals of AB 32 is approximately 16 percent.

CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan summarizes the most recent science related to climate change, including anticipated impacts to California and the levels of GHG emissions reductions necessary to likely avoid risking irreparable damage. It identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. By 2016, California had reduced GHG emissions below 1990 levels, achieving AB 32's 2020 goal four years ahead of schedule.

In 2016, the Legislature passed Senate Bill (SB) 32, which codified a 2030 GHG emissions reduction target of 40 percent below 1990 levels. With SB 32, the Legislature passed companion legislation, AB 197, which provides additional direction for developing the Scoping Plan. On December 14, 2017, CARB adopted a second update to the Scoping Plan.[10] The 2017 Scoping Plan details how the State will reduce GHG emissions to meet the 2030 target set by Executive Order B-30-15 and codified by SB 32. Other objectives listed in the 2017 Scoping plan are to provide direct GHG emissions reductions; support climate investment in disadvantaged communities; and support the Clean Power Plan and other federal actions.

Adopted December 15, 2022, CARB's 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. To achieve the targets of AB 1279, the 2022 Scoping Plan relies on existing and emerging fossil fuel alternatives and clean technologies, as well as carbon capture and storage. Specifically, the 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead

[10] California Air Resources Board, *California's 2017 Climate Change Scoping Plan,* ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf. Accessed July 8, 2024.

advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines Section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs. The regulations that impact the transportation sector are adopted and enforced by CARB on vehicle manufacturers and are outside the jurisdiction and control of local governments. The 2022 Scoping Plan accelerates development of new regulations as well as amendments to strengthen regulations and programs already in place.

Included in the 2022 Scoping Plan is a set of Local Actions (2022 Scoping Plan Appendix D) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. The 2022 Scoping Plan Appendix D includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new residential and mixed-use development in order to determine consistency with the 2022 Scoping Plan.[11] These approaches are recommendations only and are not requirements. They do not supplant lead agencies' discretion to develop their own evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

Senate Bill 32 (California Global Warming Solutions Act of 2006: Emissions Limit)
Signed into law in September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

SB 375 (The Sustainable Communities and Climate Protection Act of 2008)
Signed into law on September 30, 2008, SB 375 provides a process to coordinate land use planning, regional transportation plans, and funding priorities to help California meet AB 32's GHG reduction goals. SB 375 requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, aligns planning for transportation and housing, and creates specified incentives for the implementation of the strategies.

AB 1493 (Pavley Regulations and Fuel Efficiency Standards)
AB 1493, enacted on July 22, 2002, required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Implementation of the regulation was delayed by lawsuits filed by automakers and by the U.S. EPA's denial of an implementation waiver. The U.S. EPA subsequently granted the requested waiver in 2009, which was upheld by the by the U.S. District Court for the District of Columbia in 2011. The regulations establish one set of emission standards for passenger vehicle and light duty truck model years 2009–2016 and a second set of emissions standards for model years 2017 to 2025. By 2025, when all rules will be fully implemented, new passenger vehicles are anticipated to emit 34 percent fewer CO_2e emissions and 75 percent fewer smog-forming emissions.

SB 1368 (Emission Performance Standards)
SB 1368 is the companion bill of AB 32, which directs the California Public Utilities Commission (CPUC) to adopt a performance standard for GHG emissions for the future power purchases of California utilities. SB 1368 limits carbon emissions associated with electrical energy consumed in California by forbidding procurement arrangements for energy longer than five years from resources that exceed the emissions of a relatively clean, combined cycle natural gas power plant. The law effectively prevents California's

[11] California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Appendix D: Local Actions, 2022.

utilities from investing in, otherwise financially supporting, or purchasing power from new coal plants located in or out of the State. The CPUC adopted the regulations required by SB 1368 on August 29, 2007. The regulations implementing SB 1368 establish a standard for baseload generation owned by, or under long-term contract to publicly owned utilities, for 1,100 pounds of CO_2 per megawatt-hour.

SB 1078, SB 107, and SBX1-2 (Renewable Electricity Standards)
SB 1078 requires California to generate 20 percent of its electricity from renewable energy by 2017. SB 107 (2006) changed the due date to 2010 instead of 2017. On November 17, 2008, then Governor Arnold Schwarzenegger signed Executive Order S-14-08, which established a Renewable Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Executive Order S-21-09 also directed CARB to adopt a regulation by July 31, 2010, requiring the State's load serving entities to meet a 33 percent renewable energy target by 2020. CARB approved the Renewable Electricity Standard on September 23, 2010 by Resolution 10-23. SBX1-2 codified the 33 percent by 2020 target.

SB 350 (Clean Energy and Pollution Reduction Act of 2015)
Signed into law on October 7, 2015, SB 350 implements Executive Order B-30-15's goals. The SB 350 objectives are to increase the procurement of electricity from renewable sources from 33 percent to 50 percent (with interim targets of 40 percent by 2024, and 45 percent by 2027) and to double the energy efficiency savings in electricity and natural gas end uses of retail customers through energy efficiency and conservation. SB 350 also reorganizes the Independent System Operator to develop more regional electricity transmission markets and improve accessibility in these markets, which will facilitate the growth of renewable energy markets in the western United States.

AB 398 (Market-Based Compliance Mechanisms)
Signed on July 25, 2017, AB 398 extended the duration of the Cap-and-Trade program from 2020 to 2030. AB 398 required CARB to update the Scoping Plan and for all GHG rules and regulations adopted by the State. It also designated CARB as the statewide regulatory body responsible for ensuring that California meets its statewide carbon pollution reduction targets, while retaining local air districts' responsibility and authority to curb toxic air contaminants and criteria pollutants from local sources that severely impact public health. AB 398 also decreased free carbon allowances over 40 percent by 2030 and prioritized Cap-and-Trade spending to various programs including reducing diesel emissions in impacted communities.

SB 150 (Regional Transportation Plans)
Signed on October 10, 2017, SB 150 aligns local and regional GHG reduction targets with State targets (i.e., 40 percent below 1990 levels by 2030). SB 150 creates a process to include communities in discussions on how to monitor their regions' progress on meeting these goals. The bill also requires the CARB to regularly report on that progress, as well as on the successes and the challenges regions experience associated with achieving their targets. SB 150 provides for accounting of climate change efforts and GHG reductions and identify effective reduction strategies.

SB 100 (California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases)
Signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

AB 1346 (Air Pollution: Small Off-Road Engines)
Signed into law in October 2021, AB 1346 requires CARB, to adopt cost-effective and technologically feasible regulations to prohibit engine exhaust and evaporative emissions from new small off-road engines, consistent with federal law, by July 1, 2022. AB 1346 requires CARB to identify and, to the extent feasible, make available funding for commercial rebates or similar incentive funding as part of any updates

to existing applicable funding program guidelines to local air pollution control districts and air quality management districts to implement to support the transition to zero-emission small off-road equipment operations.

AB 1279 (The California Climate Crisis Act)
AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO2 removal solutions and carbon capture, utilization, and storage technologies.

SB 1020 (100 Percent Clean Electric Grid)
Signed on September 16, 2022, SB 1020 provides additional goals for the path to the 2045 goal of 100 percent clean electricity retail sales. It creates a target of 90 percent clean electricity retail sales by 2035 and 95 percent clean electricity retail sales by 2040.

SB 905 (Carbon Sequestration Program)
Signed on September 16, 2022, SB 905 establishes regulatory framework and policies that involve carbon removal, carbon capture, utilization, and sequestration. It also prohibits the injecting of concentrated carbon dioxide fluid into a Class II injection well for the purpose of enhanced oil recovery.

Executive Orders Related to GHG Emissions
California's Executive Branch has taken several actions to reduce GHGs using executive orders. Although not regulatory, they set the tone for the State and guide the actions of State agencies.

Executive Order S-3-05. Executive Order S-3-05 was issued on June 1, 2005, which established the following GHG emissions reduction targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that will stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Executive Order S-01-07. Issued on January 18, 2007, Executive Order S 01-07 mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. The executive order established a Low Carbon Fuel Standard (LCFS) and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission, CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. CARB adopted the LCFS on April 23, 2009.

Executive Order S-13-08. Issued on November 14, 2008, Executive Order S-13-08 facilitated the California Natural Resources Agency's development of the 2009 California Climate Adaptation Strategy. Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order S-14-08. Issued on November 17, 2008, Executive Order S-14-08 expands the State's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity

sold in the State come from renewable energy by 2020. CARB adopted the Renewable Electricity Standard on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

Executive Order S-21-09. Issued on July 17, 2009, Executive Order S-21-09 directs CARB to adopt regulations to increase California's Renewable Portfolio Standard (RPS) to 33 percent by 2020. This builds upon SB 1078 (2002), which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006), which advanced the 20 percent deadline to 2010, a goal that was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

Executive Order B-30-15. Issued on April 29, 2015, Executive Order B-30-15 establishes a California GHG reduction target of 40 percent below 1990 levels by 2030 and directs CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of $MMTCO_2e$. The 2030 target acts as an interim goal on the way to achieving reductions of 80 percent below 1990 levels by 2050, a goal set by Executive Order S-3-05. Executive Order B-30-15 also requires the State's climate adaptation plan to be updated every three years and for the State to continue its climate change research program, among other provisions. With the enactment of SB 32 in 2016, the Legislature codified the goal of reducing GHG emissions to 40 percent below 1990 levels by 2030.

Executive Order B-55-18. Issued on September 10, 2018, Executive Order B-55-18 establishes a goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing GHG emissions. The executive order requires CARB to work with relevant state agencies to develop a framework for implementing this goal. It also requires CARB to update the Scoping Plan to identify and recommend measures to achieve carbon neutrality. The executive order also requires state agencies to develop sequestration targets in the Natural and Working Lands Climate Change Implementation Plan.

Executive Order N-79-20. Signed in September 2020, Executive Order N-79-20 establishes as a goal that where feasible, all new passenger cars and trucks, as well as all drayage/cargo trucks and off-road vehicles and equipment, sold in California, will be zero-emission by 2035. The executive order sets a similar goal requiring that all medium and heavy-duty vehicles will be zero-emission by 2045 where feasible. It also directs CARB to develop and propose rulemaking for passenger vehicles and trucks, medium-and heavy-duty fleets where feasible, drayage trucks, and off-road vehicles and equipment "requiring increasing volumes" of new ZEVs "towards the target of 100 percent." The executive order directs the California Environmental Protection Agency, the California Geologic Energy Management Division (CalGEM), and the California Natural Resources Agency to transition and repurpose oil production facilities with a goal toward meeting carbon neutrality by 2045. Executive Order N-79-20 builds upon the CARB Advanced Clean Trucks regulation, which was adopted by CARB in July 2020.

California Regulations and Building Codes

California has a long history of adopting regulations to improve energy efficiency in new and remodeled buildings. These regulations have kept California's energy consumption relatively flat even with rapid population growth.

Title 20 Appliance Efficiency Regulations. The appliance efficiency regulations (California Code of Regulations [CCR] Title 20, Sections 1601-1608) include standards for new appliances. Twenty-three categories of appliances are included in the scope of these regulations. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

Title 24 Building Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) was first adopted in 1978 in response to a legislative

mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions.

On August 11, 2021, the CEC adopted the 2022 Energy Code. In December 2021, it was approved by the California Building Standards Commission for inclusion into the California Building Standards Code. Among other updates like strengthened ventilation standards for gas cooking appliances, the 2022 Energy Code includes updated standards such as new electric heat pump requirements for residential uses, schools, offices, banks, libraries, retail, and grocery stores; the promotion of electric-ready requirements for new homes including the addition of circuitry for electric appliances, battery storage panels, and dedicated infrastructure to allow for the conversion from natural gas to electricity; and the expansion of solar photovoltaic and battery storage standards to additional land uses including high-rise multi-family residences, hotels and motels, tenant spaces, offices (including medical offices and clinics), retail and grocery stores, restaurants, schools, and civic uses (including theaters auditoriums, and convention centers). Projects whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code.

Title 24 California Green Building Standards Code. The California Green Building Standards Code (CCR Title 24, Part 11 code) commonly referred to as the CALGreen Code, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. The CALGreen Code also provides voluntary measures (CALGreen Tier 1 and Tier 2) that local governments may adopt which encourage or require additional measures in the five green building topics. The CEC adopted the 2022 CALGreen Code in December 2021, went into effect on January 1, 2023. The 2022 CALGreen code focuses on battery storage system controls, demand management, heat pump space and water heating, and building electrification.

3.3 Regional

Southern California Association of Governments (SCAG)

On September 3, 2020, SCAG's Regional Council adopted Connect SoCal (*2020–2045 Regional Transportation Plan/Sustainable Communities Strategy* [2020 RTP/SCS]). The 2020 RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably. The strategy was prepared through a collaborative, continuous, and comprehensive process with input from local governments, county transportation commissions, tribal governments, non-profit organizations, businesses and local stakeholders within the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's 2020 RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15. The 2020 RTP/SCS is a long-range vision plan that balances future mobility and housing needs with economic, environmental, and public health goals.

The 2020 RTP/SCS contains over 4,000 transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges. These future investments were included in county plans developed by the six county transportation commissions and

seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone.

Since Connect SoCal was adopted in 2020, SCAG gained responsibility for the selection of transportation projects to be funded with federal revenue. The RTP/SCS invests $751.7 billion in our transportation system, primarily in operations and maintenance, to ensure the continued performance of our current network. Implementation of the 2024 RTP/SCS would add 181,200 new miles of transit revenue service, 4,000 new miles of bike lanes and 869 new miles to the Regional Express Lane Network. Strategic investments in infrastructure and transportation would improve access to employment centers and stimulate regional economic growth and opportunity in historically underserved areas. Connect SoCal is an important planning document for the region, allowing public agencies to implement transportation projects in a coordinated manner while qualifying for federal and state funding. Connect SoCal also supports local jurisdictions in making informed land use planning and housing development decisions.

The RTP/SCS accounts for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. It is also supported by a combination of transportation and land use strategies that help the region achieve State GHG emissions reduction goals and FCAA requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently.

3.4 Local

City of Beverly Hills General Plan

The City of Beverly Hills General Plan contains the following goals and policies that address GHG emissions and sustainability. The following apply to the Project:

<u>City of Beverly Hills General Plan, Land Use Element</u>

> ***Land Use Policy LU 14.2****: Require that sites and buildings be planned and designed to meet applicable environmental sustainability objectives by: (a) facilitating pedestrian access between properties and access to public transit; (b) providing solar access; (c) assuring natural ventilation; (d) enabling capture and re-use of stormwater and graywater on-site while reducing discharge into the stormwater system; and (e) using techniques consistent with the City's sustainability programs such as the City's Green Building Ordinance.*
>
> ***Land Use Policy LU 14.4****: Require that new and substantially renovated buildings be designed and constructed in accordance with the City's sustainability programs such as the City's Green Building Ordinance or comparable criteria to reduce energy, water, and natural resource consumption, minimize construction wastes, use recycled materials, and avoid the use of toxics and hazardous material.*
>
> ***Land Use Policy LU 14.6****: Promote and provide incentives for the retrofit of existing structures with green building techniques such as those required by the City's Green Building Ordinance, including installation of water-conserving fixtures in multifamily housing units on change of tenancy.*
>
> ***Land Use Policy LU 16.9****: Require that private and public buildings be designed to promote public health by prohibiting the use of toxic building materials and high-VOC paints, providing adequate ventilation and access to natural lighting, and using "green building" techniques as required by the City's sustainability programs such as the Green Building Ordinance.*

<u>City of Beverly Hills General Plan, Open Space Element</u>

> ***Open Space Policy OS 7.7****: Work with the South Coast Air Quality Management Board to meet state and federal ambient air quality standards.*

Open Space Policy OS 7.8*: Require new development projects that exceed the South Coast Air Quality Management Board's (SCAQMB) Reactive Organic Gases (ROG) and Nitrogen Oxides (NOX) operational thresholds to incorporate design or operational features that reduce emissions equal to 15-percent from the level that would be produced by an unmitigated project.*

Open Space Policy OS 7.9*: Work with the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD) to comply with statewide greenhouse gas reduction goals as established in the "Global Warming Solutions Act of 2006 for 2020" (AB 32) and any other subsequent legislation.*

Open Space Policy OS 7.10*: Comply with pertinent State regulations to assess citywide greenhouse gas emissions for existing land uses and the adopted general plan build-out.*

Open Space Policy OS 7.11*: Educate the public about air quality standards, health effects, and efforts that residents can make to improve air quality and reduce greenhouse gas emissions in the Los Angeles Basin.*

Open Space Policy OS 7.12*: Review proposed development projects to ensure projects incorporate feasible measures that reduce construction and operations emissions for Reactive Organic Gases (ROG), Nitrogen Oxides (NO_X), and Particulate Matter (PM10 and PM2.5).*

City of Beverly Hills Sustainable City Plan

The Beverly Hills Sustainable City Plan establishes guiding principles and goals that the City uses to develop and implement programs that focus on sustainability. The following goal and policies are applicable to the Project:

Climate Change and Air Quality Goal*: Combat climate change and improve air quality*

Policy 1*: Minimize greenhouse gas and other emissions from City facilities and operations*

Policy 2*: Minimize mobile source emissions from on- and off-road (construction) vehicles.*

Policy 3*: Minimize stationary source air emissions.*

Policy 4*: Minimize particulate matter, both airborne photochemical precipitates and windborne dust.*

4 SIGNIFICANCE CRITERIA AND METHODOLOGY

4.1 CEQA Thresholds and Significance Criteria

Based upon the criteria derived from CEQA Guidelines Appendix G, a project normally would have a significant effect on the environment if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance; or
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Addressing GHG emissions generation impacts requires an agency to determine what constitutes a significant impact. Amendments to the CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project's GHG emissions will have a "significant" impact on the environment. Pursuant to CEQA Guidelines Section 15064.4(a), agencies are to use "careful judgment" and "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" the project's GHG emissions.

GHG Thresholds

The South Coast Air Quality Management District (SCAQMD) formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. This Working Group was formed to assist SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research, CARB, the Attorney General's Office, a variety of city and county planning departments in the South Coast Air Basin, various utilities such as sanitation and power companies throughout the South Coast Air Basin, industry groups, and environmental and professional organizations. The Working Group proposed a tiered approach to evaluating GHG emissions for development projects where the SCAQMD is not the lead agency, wherein projects are evaluated sequentially through a series of "tiers" to determine whether the project is likely to result in a potentially significant impact due to GHG emissions.

With the tiered approach, a project is compared against the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The SCAQMD established a threshold of 10,000 metric tons of CO_2e ($MTCO_2e$) per year for industrial projects and a 3,000 $MTCO_2e$ threshold was proposed for non-industrial projects but it has not been adopted. The SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact.

Tier 4 consists of three decision tree options. Under the Tier 4 first option, the SCAQMD initially outlined that a project would be excluded if design features and/or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Working Group did not provide a recommendation for this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 $MTCO_2e$ per service population per year. Tier 5 would exclude projects that implement offsite mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

Tier 3 Screening Thresholds. When the tiered approach is applied to a proposed project, and the project is found not to comply with Tier 1 or Tier 2, the project's emissions are compared against a screening threshold, as described above, for Tier 3. The screening threshold formally adopted by SCAQMD is an "interim" screening threshold for stationary source industrial projects where the SCAQMD is the lead agency under CEQA. The threshold was termed "interim" because, at the time, SCAQMD anticipated that CARB would be adopting a statewide significance threshold that would inform and provide guidance to SCAQMD in its adoption of a final threshold. However, no Statewide threshold was ever adopted, and the interim threshold remains in effect.

For projects where SCAQMD is not a lead agency, no screening thresholds have been formally adopted. However, in 2008, the SCAQMD Working Group has recommended a threshold of 10,000 $MTCO_2e$/year for industrial projects and 3,000 $MTCO_2e$/year for residential and commercial projects. The SCAQMD staff determined that these thresholds would "capture" 90 percent of GHG emissions from these sectors, "capture" meaning that 90 percent of total emissions from all new projects would be subject to some type of CEQA analysis (i.e., found potentially significant).[12]

On September 28, 2010, air quality experts serving on the SCAQMD GHG CEQA Significance Threshold Stakeholder Working Group recommended an interim screening level numeric bright-line threshold of 3,000 $MTCO_2e$ annually. The Working Group was formed to assist the SCAQMD's efforts to develop a GHG significance threshold and is composed of a wide variety of stakeholders including the State Office of Planning and Research (OPR), CARB, the Attorney General's Office, various city and county planning departments. The numeric bright line and efficiency-based thresholds, which were developed for consistency with CEQA requirements for developing significance thresholds, are supported by substantial evidence and provide guidance to CEQA practitioners and lead agencies for determining whether GHG emissions from a proposed project are significant. Therefore, this analysis relies on SCAQMD's recommended Tier 3 screening thresholds to determine the significance of a project's GHG emissions. To provide the most conservative analysis, the City will apply the 3,000 $MTCO_2e$/year screening threshold recommended by SCAQMD for residential and commercial projects.

4.2 Methodology

Global climate change is, by definition, a cumulative impact of GHG emissions. Therefore, there is no project-level analysis. The baseline against which to compare potential impacts of the project includes the natural and anthropogenic drivers of global climate change, including world-wide GHG emissions from human activities that almost doubled between 1970 and 2010 from approximately 27 gigatons (Gt) of CO_2/year to nearly 49 $GtCO_2$/year.[13] As such, the geographic extent of climate change and GHG emissions cumulative impact discussion is worldwide.

The Project's construction and operational emissions were calculated using the California Emissions Estimator Model version 2022.1 (CalEEMod). Details of the modeling assumptions and emission factors are provided in **Appendix A: Greenhouse Gas Emissions Data**. For construction, CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and applying the mobile-source and fugitive dust emissions factors derived from

[12] SCAQMD, "Staff Report: Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans," December 5, 2008, Attachment E: "Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold," October 2008, page 3-2.

[13] Intergovernmental Panel on Climate Change, *Climate Change 2014 Mitigation of Climate Change Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2014.

CalEEMod. The Project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles.

The Project's operational GHG emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance, consumer products), electrical generation, natural gas consumption, water supply and wastewater treatment, and solid waste. These emissions categories are discussed below.

- **Area Sources**. Area source emissions occur from architectural coatings, landscaping equipment, and consumer products. Additionally, the primary emissions from architectural coatings are volatile organic compounds, which are relatively insignificant as direct GHG emissions.
- **Energy Consumption**. Energy consumption consists of emissions from project consumption of electricity and natural gas. Primary uses of electricity and natural gas by the Project would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. Energy emissions are calculated based on consumption rates and emissions factors in CalEEMod. No changes were made to the default energy usage consumption rates or emissions factors.
- **Solid Waste**. Solid waste releases GHG emissions in the form of methane when these materials decompose. Solid waste emissions are calculated based on generation rates and emissions factors in CalEEMod.
- **Water and Wastewater**. Project GHG emissions would be generated from energy consumption associated with water and wastewater conveyance and treatment. Water and wastewater emissions are calculated based on the estimated consumption and emissions factors in CalEEMod.
- **Mobile Sources**. Mobile sources are emissions from motor vehicles. Project trip generation is based on the following 11th Edition Institute of Transportation Engineers (ITE) land use categories:
  - ITE Land Use 822: Strip Retail Plaza (<40k) – 6,797 square feet, 370 total daily vehicle trips.

  The Project would generate 370 net daily trips. For this analysis, it was assumed the mobile source emission rates in CalEEMod used the CARB SAFE Rule adjustment factors.[14]

[14] The U.S. EPA repealed SAFE Rule Part 1 on January 28, 2022. Therefore, the mobile source emissions in this analysis are conservative.

5 POTENTIAL IMPACTS AND MITIGATION

5.1 Greenhouse Gas Emissions

Threshold 5.1 Would the Project generate GHG emissions, either directly or indirectly, that could have a significant impact on the environment?

Short-Term Construction Greenhouse Gas Emissions

The Project would result in direct emissions of CO_2, N_2O, and CH_4 from construction equipment and the transport of materials and construction workers to and from the Project Site. The GHG emissions only occur during temporary construction activities and would be cease once construction is complete. The total GHG emissions (in $MTCO_2e$) generated during construction are shown in **Table 2: Construction-Related Greenhouse Gas Emissions**.

Table 2: Construction-Related Greenhouse Gas Emissions

Category	$MTCO_2e$
Construction Year 1 (2025)	159.6
Construction Year 2 (2026)	15.07
Total Construction Emissions	174.7
30-Year Amortized Construction Emissions	5.82

Source: CalEEMod version 2022.1. Refer to Appendix A: Greenhouse Gas Emissions Data for model outputs.

As shown in Table 2, the Project would result in the generation of approximately 174.7 $MTCO_2e$ over the course of construction. Construction GHG emissions are typically summed and amortized over a 30-year period and then added to the operational emissions.[15] The amortized Project construction emissions would be 5.82 $MTCO_2e$ per year. Once construction is complete, the generation of these GHG emissions would cease.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, onsite combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Prior to issuance of a building permit, the City would review and verify that the Project plans demonstrate compliance with the current version of the Building and Energy Efficiency Standards. The Project would also be required to adhere to the provisions of the CALGreen Code, which establishes planning and design standards for sustainable site development, and energy efficiency. Construction activities would be required to monitor air quality emissions using applicable regulatory guidance such as the SCAQMD Rules.

The Project's operational GHG emissions are summarized in **Table 3: Operational Greenhouse Gas Emissions**. As shown in Table 3, the Project's unmitigated emissions would be approximately 344.93 $MTCO_2e$ annually from both construction and operations. Project-related GHG emissions would not exceed the City's 3,000 $MTCO_2e$ per year threshold. The majority of the GHG emissions (over 90 percent)

[15] The Project lifetime is based on the standard 30-year assumption of the SCAQMD (SCAQMD, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13,* August 26, 2009).

are associated with non-construction related mobile sources. Emissions of motor vehicles are controlled by State and federal standards, and the Project has no control over these standards. Therefore, the Project would not generate GHG emissions that could have a significant impact on the environment, and impacts would be less than significant.

Table 3: Operational Greenhouse Gas Emissions

Emissions Source	$MTCO_2e$ Emissions Per Year
Construction Amortized Over 30 Years	5.82
Area Source	0.14
Energy	12.47
Mobile	323.04
Waste	2.23
Water	1.23
Refrigerants	0.01
TOTAL	344.93
Threshold	*3,000*
Exceeds Threshold?	**No**

Source: CalEEMod version 2022.1. Refer to Appendix A: Greenhouse Gas Emissions Data for model outputs.

Mitigation Measures: No mitigation is required.

Level of Significance: Less Than Significant Impact.

5.2 Greenhouse Gas Reduction Plan Compliance

Threshold 5.2 Would the Project conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions?

Regional Transportation Plan/Sustainable Communities Strategy Consistency

On April 4, 2024, SCAG's Regional Council adopted Connect SoCal 2024 (*2024 - 2050 Regional Transportation Plan/Sustainable Communities Strategy* [2024 RTP/SCS]). This analysis also discusses the Project's consistency with the previously adopted Connect SoCal (*2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy* [2020 RTP/SCS]) which was adopted on September 3, 2020. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. Under SB 375, SCAG's 2024 RTP/SCS establishes GHG emissions goals to reduce GHG emissions in the region by eight percent from 2005 levels by 2020 and by 2035. SCAG's 2020 RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

Since Connect SoCal was adopted in 2020, SCAG gained responsibility for the selection of transportation projects to be funded with federal revenue. The 2024 RTP/SCS invests $751.7 billion in our transportation

system, primarily in operations and maintenance, to ensure the continued performance of our current network. The 2024 RTP/SCS would also add 181,200 new miles of transit revenue service, 4,000 new miles of bike lanes and 869 new miles to the Regional Express Lane Network. Strategic investments in infrastructure and transportation would improve access to employment centers and stimulate regional economic growth and opportunity in historically underserved areas. Connect SoCal is an important planning document for the region, allowing public agencies to implement transportation projects in a coordinated manner while qualifying for federal and state funding. Connect SoCal also supports local jurisdictions in making informed land use planning and housing development decisions.

The 2024 and 2020 RTP/SCS plans account for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. The 2024 and 2020 RTP/SCS are also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and FCAA requirements, increased housing production, improved equity and resilience, the preservation of natural lands, improvement of public health, increased transportation safety, support for the region's vital goods movement industries and more efficient use of resources. GHG emissions resulting from development-related mobile sources are the most potent source of emissions; therefore, the Project's comparison to the 2024 and 2020 RTP/SCS is an appropriate indicator of whether the Project would inhibit the post-2020 GHG reduction goals promulgated by the State. The Project's consistency with the 2024 and 2020 RTP/SCS goals is analyzed in detail in **Table 4: Regional Transportation Plan/Sustainable Communities Strategy Consistency**.

Table 4: Regional Transportation Plan/Sustainable Communities Strategy Consistency	
SCAG Goals	**Consistency**
2024 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY CONSISTENCY[1]	
Mobility: Build and maintain an integrated multimodal transportation network.	
Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions	**Not Applicable**. This is not a project-specific policy and is therefore not applicable.
Ensure that reliable, accessible, affordable, and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities	**Not Applicable**. This is not a project-specific policy and is therefore not applicable.
Support planning for people of all ages, abilities, and backgrounds	**Not Applicable**. This is not a project-specific policy and is therefore not applicable.
Communities: Develop, connect, and sustain communities that are livable and thriving	
Create human-centered communities in urban, suburban, and rural settings to increase mobility options and reduce travel distances	**No Conflict**. The Project is located in an urban area in proximity to existing community services. Additionally, the Project is located near existing transit routes and access to State Route 2 [SR-2]).
Produce and preserve diverse housing types in an effort to improve affordability, accessibility, and opportunities for all households	**Not Applicable**. The Project does not propose residential uses.
Environment: Create a healthy region for the people of today and tomorrow	
Develop communities that are resilient and can mitigate, adapt to, and respond to chronic and acute stresses and disruptions, such as climate change	**No Conflict**. As discussed above, the Project would not exceed the City's GHG emission threshold, and therefore would not result in significant GHG impacts.

Table 4: Regional Transportation Plan/Sustainable Communities Strategy Consistency		
SCAG Goals		**Consistency**
Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water		**No Conflict**. While the Project is not a transportation improvement Project, location of the Project within a developed area would reduce trip lengths, which would reduce GHG emissions. Additionally, the reduction of energy use and promotion of more environmentally sustainable development are encouraged through the development of alternative transportation methods, green design techniques for buildings, and other energy-reducing techniques such as compliance with the provisions of the California Building Energy Efficiency Standards and the Green Building Standards Code (CALGreen).
Conserve the region's resources		**No Conflict**. The Project is located on land that is not designated for agricultural uses, natural resources, or conservation. Therefore, Project development would not result in a loss of the region's resources.
Economy: Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all people in the region		
Improve access to jobs and educational resources		**No Conflict**. The Project proposes a retail development within an urban area, in close proximity to residential uses. Therefore, the location of the Project would improve access to employment opportunities.
Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities		**No Conflict**. The Project includes retail uses that would support goods movement.
2020 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY CONSISTENCY[2]		
GOAL 1:	Encourage regional economic prosperity and global competitiveness.	**Not Applicable:** This is not a project-specific goal. Notwithstanding, the Project is of retail usage, which would further promote regional economic activity and commercial competition.
GOAL 2:	Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No Conflict:** Although this Project is not a transportation improvement project, the Project is located near existing transit routes on SR-2 to the north, Metro Line 20 bus stop to the southwest, Metro Line 4 bust stop to the northeast, and Metro Line 720 bus stop to the southwest. The Project is also northwest of the future Metro D Line Wilshire/Rodeo Station.
GOAL 3:	Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable:** The Project is not a transportation improvement project.
GOAL 4:	Increase person and goods movement and travel choices within the transportation system.	**Not Applicable:** The Project is not a transportation improvement project.
GOAL 5:	Reduce greenhouse gas emissions and improve air quality.	**No Conflict:** The Project Site is in an urban area near existing public transit routes and freeways. The Project's location within an urbanized area would reduce trip lengths, which would reduce GHG and emissions.
GOAL 6:	Support healthy and equitable communities	**No Conflict:** The Project does not exceed the City's GHG emission threshold. The Project would not violate any GHG standards, contribute substantially to an existing or projected GHG violation, or result in significant GHG impacts.

Table 4: Regional Transportation Plan/Sustainable Communities Strategy Consistency		
SCAG Goals		**Consistency**
GOAL 7:	Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Not Applicable:** This is not a project-specific goal.
GOAL 8:	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable:** This is not a project-specific goal.
GOAL 9:	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Not Applicable:** The Project is not a residential project.
GOAL 10:	Promote conservation of natural and agricultural lands and restoration of habitats.	**Not Applicable:** The Project Site is not located on agricultural lands and does not contain native habitat.
Sources: 1. SCAG, *Connect SoCal* (*2024 – 2050 Regional Transportation Plan/Sustainable Communities Strategy*), 2024. 2. SCAG, *Connect SoCal* (*2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy*), 2020.		

2017 California Air Resource Board Scoping Plan Consistency

Pursuant to the requirements in AB 32, CARB adopted the *Climate Change Scoping Plan* (Scoping Plan) in 2008, which provides a range of GHG reduction actions. The 2017 Scoping Plan Update identifies additional GHG reduction measures necessary to achieve the 2030 target of a 40 percent reduction below 1990 levels. These measures build upon those identified in the first update to the Scoping Plan in 2013. The Project's consistency with the CARB Scoping Plan, and implementing regulatory programs, is analyzed in detail in **Table 5: Project Consistency with Applicable CARB Scoping Plan Measures**. As indicated in Table 5, the Project would comply with the applicable measures. As such, impacts related to consistency with the Scoping Plan would be less than significant, and no mitigation is required.

Table 5: Project Consistency with Applicable CARB Scoping Plan Measures			
Scoping Plan Sector	**Scoping Plan Measure**	**Implementing Regulations**	**Project Consistency**
Transportation	California Cap-and-Trade Program Linked to Western Climate Initiative	Regulation for the California Cap on GHG Emissions and Market-Based Compliance Mechanism October 20, 2015 (CCR 95800)	**No Conflict.** The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers. However, the regulation indirectly affects people who use the products and services produced by these industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, generated in-State or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. The proposed Project would not conflict with implementation of the Cap-and-Trade Program and would indirectly be consistent with regard to the use of electricity and fuel.

Table 5: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
	California Light-Duty Vehicle GHG Standards	Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles	**No Conflict**. This measure applies to all new vehicles starting with model year 2012. The Project would not conflict with its implementation as it would apply to all new passenger vehicles purchased in California. Passenger vehicles, model year 2012 and later, associated with Project construction and operation would be required to comply with the Pavley emissions standards.
		2012 LEV III California GHG and Criteria Pollutant Exhaust and Evaporative Emission Standards	**No Conflict.** The LEV III amendments provide reductions from new vehicles sold in California between 2017 and 2025. Passenger vehicles associated with Project construction and operations would be required to comply with LEV III standards.
	Low Carbon Fuel Standard	2009 readopted in 2015. Regulations to Achieve GHG Emission Reductions Subarticle 7. Low Carbon Fuel Standard CCR 95480	**No Conflict.** This measure applies to transportation fuels utilized by vehicles in California. The Project would not conflict with implementation of this measure. It is assumed that any motor vehicles associated with Project construction and operations would be consistent with the measure and utilize low carbon transportation fuels.
	Regional Transportation-Related GHG Targets.	SB 375. Cal. Public Resources Code §§ 21155, 21155.1, 21155.2, 21159.28	**No Conflict**. The Project would provide development in the region that is consistent with the growth projections in the 2020 RTP/SCS. The Project does not propose any dwelling units which would increase population . The Project would result in additional employment opportunities and foot traffic in the area. However, the Project is a retail project that is near major freeways and other services. By facilitating a development near existing public transit options and reducing single-passenger vehicle parking available on the Project Site, the Project would also reduce mobile-source GHG emissions. The Project would generate 370 net daily trips and public transit will be locally accessible.
	Goods Movement	Goods Movement Action Plan January 2007	**Not Applicable**. The Project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation.
	Medium/Heavy-Duty Vehicle	2010 Amendments to the Truck and Bus Regulation, the Drayage Truck Regulation and the Tractor-Trailer GHG Regulation	**No Conflict**. This measure applies to medium- and heavy-duty vehicles that operate in the State. The Project would not conflict with implementation of this measure. Medium- and heavy-duty vehicles associated with Project construction would be required to comply with this regulation.
	High Speed Rail	Funded under SB 862	**Not Applicable**. This is a Statewide measure that cannot be implemented by a project applicant or Lead Agency.
Electricity and Natural Gas	Energy Efficiency	Title 20 Appliance Efficiency Regulation	

Table 5: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
		Title 24 Part 6 Energy Efficiency Standards for Residential and Non-Residential Building	**No Conflict.** The Project would not conflict with implementation of this measure, as it would be subject to compliance with the latest energy efficiency standards.
		Title 24 Part 11 California Green Building Code Standards	
	Renewable Portfolio Standard/Renewable Electricity Standard.	2010 Regulation to Implement the Renewable Electricity Standard (33% 2020)	**No Conflict**. The Project would obtain electricity from the electric utility, Southern California Edison (SCE). SCE obtained 30.9 percent of its power supply from renewable sources in 2020 and include 50 percent and 100 percent renewable Green Rate options. Therefore, the utility would provide power to the Project that would be is comprised of a greater percentage of renewable sources.
	Million Solar Roofs Program	SB 350 Clean Energy and Pollution Reduction Act of 2015 (50% 2030)	
	Million Solar Roofs Program	Tax Incentive Program	**No Conflict.** This measure is to increase solar use throughout California, which is being done by various electricity providers and existing solar programs. The program provides incentives that are in place at the time of construction.
Water	Water	Title 24 Part 11 California Green Building Code Standards	**No Conflict.** The Project would comply with the CALGreen Code, which require a 20 percent reduction in indoor water use.
		SBX 7-7—The Water Conservation Act of 2009	
		Model Water Efficient Landscape Ordinance	
Green Buildings	Green Building Strategy	Title 24 Part 11 California Green Building Code Standards	**No Conflict.** The State is required to increase use of green building practices. The Project would implement required green building strategies through existing regulations that require the Project to comply with various CALGreen Code standards.
Industry	Industrial Emissions	2018 CARB Mandatory Reporting Regulation	**Not Applicable.** The Mandatory Reporting Regulation requires facilities and entities with more than 10,000 $MTCO_2e$ of combustion and process emissions, all facilities belonging to certain industries, and all electric power entities to submit an annual GHG emissions data report directly to CARB. As shown above, although total Project GHG emissions would not exceed 3,000 $MTCO_2e$, the Project is not considered a "facility" and the majority of these emissions are from mobile sources. Therefore, this regulation would not apply.
Recycling and Waste Management	Recycling and Waste	Title 24 Part 11 California Green Building Code Standards	**No Conflict.** The Project would not conflict with implementation of these measures. The Project is required to achieve the recycling mandates via compliance with the CALGreen Code.

Table 5: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
		AB 341 Statewide 75 Percent Diversion Goal	
Forests	Sustainable Forests	Cap and Trade Offset Projects	**Not Applicable.** The Project is in an area designated for urban uses. No forested lands exist on the site.
High Global Warming Potential	High Global Warming Potential Gases	CARB Refrigerant Management Program CCR 95380	**No Conflict**. The regulations are applicable to refrigerants used by large air conditioning systems and large commercial and industrial refrigerators and cold storage systems. The Project would not conflict with the refrigerant management regulations adopted by CARB.
Agriculture	Agriculture	Cap and Trade Offset Projects for Livestock and Rice Cultivation	**Not Applicable**. No grazing, feedlot, or other agricultural activities that generate manure occur currently on site or are proposed by the Project.

Source: CARB, *California's 2017 Climate Change Scoping Plan*, November 2017 and CARB, *Climate Change Scoping Plan*, December 2008.

2022 California Air Resource Board Scoping Plan Consistency

CARB's 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The 2022 Scoping Plan focuses on zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high GWP; providing communities with sustainable options for walking, biking, and public transit; displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines); and scaling up new options such as green hydrogen. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (i.e., Climate Action Plan) consistent with CEQA Guidelines Section 15183.5.

Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy ZEV buses and trucks. Additional transportation policies include the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Clean Off-Road Fleet Recognition Program, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375. GHGs would be further reduced through the Cap-and-Trade Program carbon pricing and SB 905. SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon dioxide removal projects and technology.

As indicated above, GHG reductions are also achieved as a result of State of California energy and water efficiency requirements for new residential developments. These efficiency improvements correspond to reductions in secondary GHG emissions. For example, in California, most of the electricity that powers homes is derived from natural gas combustion. Therefore, energy saving measures, such as Title 24, reduces GHG emissions from the power generation facilities by reducing load demand.

As discussed above and identified in Table 4 and Table 5, the Project would be consistent with all applicable plan goals and applicable regulatory programs designed to reduce GHG emissions generated by land use projects. The Project would be subject to compliance with all building codes in effect at the time of construction, which include energy conservation measures mandated by California Building

Standards Code Title 24 – Energy Efficiency Standards. Because Title 24 standards require energy conservation features in new construction (e.g., high-efficiency lighting, high-efficiency HVAC systems, thermal insulation, double-glazed windows, water conserving plumbing fixtures), they indirectly regulate and reduce GHG emissions. California's Building Energy Efficiency Standards are updated on an approximately three-year cycle.

As shown in Table 3, approximately 97 percent of the Project's emissions are from energy and mobile sources, which would be further reduced by the 2022 Scoping Plan actions described above. The City has no control over vehicle emissions (approximately 96.7 percent of the Project's total emissions). However, these emissions would decline in the future due to Statewide measures, as well as cleaner technology and fleet turnover. The Project would not obstruct or interfere with efforts to increase ZEVs or State efforts to improve system efficiency. Compliance with applicable State standards (e.g., continuation of the Cap-and-Trade regulation; CARB's Mobile Source Strategy, Sustainable Freight Action Plan, and Advanced Clean Truck Regulation; Executive Order N-79-20; SB 100: renewable electricity portfolio improvements that require 60 percent renewable electricity by 2030 and 100 percent renewable by 2045, etc.) would ensure consistency with State and regional GHG reduction planning efforts, including the 2022 Scoping Plan. It is also noted that the Project would not convert any Natural and Working Lands (NWL) and/or decrease the State's urban forest carbon stock, which are areas of emphasis in the 2022 Scoping Plan. Further, the Project includes residential land uses that would potentially reduce the need to travel long distances for some residents and reducing associated GHG emissions.[16]

Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that Project operations would benefit from applicable measures enacted to meet State GHG reduction goals. The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. As such, impacts related to consistency with the 2022 Scoping Plan would be less than significant, and no mitigation is required.

In conclusion, the Project does not conflict with the applicable plans and regulatory programs that are discussed above and therefore with respect to this particular threshold, impacts would be less than significant.

Mitigation Measures: No mitigation is required.

Level of Significance: Less Than Significant Impact.

5.3 Cumulative Setting, Impacts, and Mitigation Measures

Cumulative Setting

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and TACs, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have much longer atmospheric lifetimes of one year to several thousand years that allow them to be dispersed around the globe.

[16] California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, 2010. The California Air Pollution Control Officers Association identifies that infill developments, such as the proposed Project reduce vehicle miles traveled (VMT) which reduces fuel consumption. Infill projects such as the proposed Project would have an improved location efficiency.

Cumulative Impacts

It is generally the case that an individual project of the proposed Project's size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of Project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. As discussed above, Project GHG emissions would not exceed the 3,000 $MTCO_2e$ per year threshold and would not impede the achievement of Statewide 2030 and 2050 GHG emission reduction targets. Therefore, the Project would not be cumulatively considerable, and impacts would be less than significant.

Mitigation Measures: No mitigation is required.

Level of Significance: Less Than Significant Impact.

6 REFERENCES

1. California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*, August 2010.
2. California Air Resources Board, *Climate Change Scoping Plan*, December 2008.
3. California Air Resources Board, *California's 2017 Climate Change Scoping Plan,* 2017.
4. California Air Resources Board, *California's 2022 Climate Change Scoping Plan,* 2022.
5. City of Beverly Hills, *Beverly Hills General Plan*, 2010.
6. City of Beverly Hills, *Beverly Hills Sustainable City Plan*, 2009.
7. Intergovernmental Panel on Climate Change, *Climate Change 2007: The Physical Science Basis*, 2007.
8. Intergovernmental Panel on Climate Change, *Climate Change 2013: The Physical Science Basis, Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2013.
9. Intergovernmental Panel on Climate Change, *Climate Change 2014 Mitigation of Climate Change Working Group III Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*, 2014.
10. Los Angeles County Metropolitan Transportation Authority (Metro), *Westside Purple Line Extension Section 2 Project December 2023 Quarterly Project Status Report*, 2023,
11. National Research Council, *Advancing the Science of Climate Change*, 2010.
12. Southern California Association of Governments, *Connect SoCal (2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy*, 2020.
13. Southern California Association of Governments, *Connect SoCal (2024 - 2050 Regional Transportation Plan/Sustainable Communities Strategy*, 2024.
14. South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold,* October 2008.
15. South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*, 2009.
16. U.S. EPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016*, 2018.
17. U.S. EPA, *Methane and Nitrous Oxide Emission from Natural Sources*, 2010.
18. U.S. EPA, *Overview of Greenhouse Gases*, 2018.
19. U.S. EPA and NHTSA, *Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles – Phase 2*, 2016.
20. U.S. EPA and NHTSA, *Federal Register, Vol. 84, No. 188, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program*, 2019.
21. U.S. EPA and NHTSA, *Final Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026*, 2021.

Appendix A

Greenhouse Gas Emissions Data

450 Roxbury Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	450 Roxbury
Construction Start Date	1/1/2025
Operational Year	2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	19.6
Location	450 N Roxbury Dr, Beverly Hills, CA 90210, USA
County	Los Angeles-South Coast
City	Beverly Hills
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4308
EDFZ	16
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.25

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Strip Mall	6.80	1000sqft	0.16	6,797	0.00	—	—	—
Other Asphalt Surfaces	0.07	1000sqft	< 0.005	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.63	0.53	5.19	7.11	0.01	0.22	0.04	0.26	0.20	0.01	0.21	—	1,370	1,370	0.06	0.02	0.21	1,377
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.30	3.27	5.19	7.09	0.01	0.22	0.19	0.35	0.20	0.04	0.21	—	1,369	1,369	0.06	0.02	0.02	1,375
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.45	0.38	3.67	5.03	0.01	0.15	0.04	0.19	0.14	0.01	0.15	—	960	960	0.04	0.01	0.07	964
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.08	0.07	0.67	0.92	< 0.005	0.03	0.01	0.03	0.03	< 0.005	0.03	—	159	159	0.01	< 0.005	0.01	160

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.63	0.53	5.19	7.11	0.01	0.22	0.04	0.26	0.20	0.01	0.21	—	1,370	1,370	0.06	0.02	0.21	1,377
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.63	0.53	5.19	7.09	0.01	0.22	0.19	0.35	0.20	0.04	0.21	—	1,369	1,369	0.06	0.02	0.02	1,375
2026	3.30	3.27	4.86	7.04	0.01	0.19	0.04	0.23	0.17	0.01	0.18	—	1,367	1,367	0.06	0.02	0.01	1,373
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.45	0.38	3.67	5.03	0.01	0.15	0.04	0.19	0.14	0.01	0.15	—	960	960	0.04	0.01	0.07	964
2026	0.22	0.21	0.34	0.49	< 0.005	0.01	< 0.005	0.02	0.01	< 0.005	0.01	—	90.6	90.6	< 0.005	< 0.005	0.01	91.0
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	0.08	0.07	0.67	0.92	< 0.005	0.03	0.01	0.03	0.03	< 0.005	0.03	—	159	159	0.01	< 0.005	0.01	160
2026	0.04	0.04	0.06	0.09	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	15.0	15.0	< 0.005	< 0.005	< 0.005	15.1

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.47	1.37	0.77	8.88	0.02	0.01	1.77	1.78	0.01	0.45	0.46	4.81	2,059	2,064	0.60	0.09	6.67	2,111
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.41	1.30	0.84	8.03	0.02	0.01	1.77	1.78	0.01	0.45	0.46	4.81	1,976	1,981	0.60	0.09	0.21	2,023

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.43	1.33	0.85	8.42	0.02	0.01	1.75	1.76	0.01	0.44	0.46	4.81	1,999	2,003	0.60	0.09	2.90	2,048
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.26	0.24	0.15	1.54	< 0.005	< 0.005	0.32	0.32	< 0.005	0.08	0.08	0.80	331	332	0.10	0.01	0.48	339

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.26	1.16	0.76	8.58	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,979	1,979	0.11	0.08	6.63	2,013
Area	0.22	0.21	< 0.005	0.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.22	1.22	< 0.005	< 0.005	—	1.22
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	74.9	74.9	0.01	< 0.005	—	75.3
Water	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Waste	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	1.47	1.37	0.77	8.88	0.02	0.01	1.77	1.78	0.01	0.45	0.46	4.81	2,059	2,064	0.60	0.09	6.67	2,111
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.24	1.14	0.83	8.03	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,898	1,898	0.11	0.09	0.17	1,926
Area	0.16	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	74.9	74.9	0.01	< 0.005	—	75.3
Water	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Waste	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04

Total	1.41	1.30	0.84	8.03	0.02	0.01	1.77	1.78	0.01	0.45	0.46	4.81	1,976	1,981	0.60	0.09	0.21	2,023
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.23	1.13	0.84	8.21	0.02	0.01	1.75	1.76	0.01	0.44	0.46	—	1,920	1,920	0.11	0.09	2.86	1,951
Area	0.20	0.20	< 0.005	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.83	0.83	< 0.005	< 0.005	—	0.84
Energy	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	74.9	74.9	0.01	< 0.005	—	75.3
Water	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Waste	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	1.43	1.33	0.85	8.42	0.02	0.01	1.75	1.76	0.01	0.44	0.46	4.81	1,999	2,003	0.60	0.09	2.90	2,048
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.23	0.21	0.15	1.50	< 0.005	< 0.005	0.32	0.32	< 0.005	0.08	0.08	—	318	318	0.02	0.01	0.47	323
Area	0.04	0.04	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.14	0.14	< 0.005	< 0.005	—	0.14
Energy	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.4	12.4	< 0.005	< 0.005	—	12.5
Water	—	—	—	—	—	—	—	—	—	—	—	0.16	0.54	0.70	0.02	< 0.005	—	1.23
Waste	—	—	—	—	—	—	—	—	—	—	—	0.64	0.00	0.64	0.06	0.00	—	2.23
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	0.26	0.24	0.15	1.54	< 0.005	< 0.005	0.32	0.32	< 0.005	0.08	0.08	0.80	331	332	0.10	0.01	0.48	339

3. Construction Emissions Details

3.1. Demolition (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.56	0.47	4.33	5.65	0.01	0.16	—	0.16	0.14	—	0.14	—	852	852	0.03	0.01	—	855
Demolition	—	—	—	—	—	—	0.05	0.05	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.27	0.36	< 0.005	0.01	—	0.01	0.01	—	0.01	—	53.7	53.7	< 0.005	< 0.005	—	53.9
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.89	8.89	< 0.005	< 0.005	—	8.92
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.04	0.05	0.59	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	131	131	0.01	< 0.005	0.01	133
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	42.2	42.2	< 0.005	0.01	< 0.005	44.2
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.38	8.38	< 0.005	< 0.005	0.01	8.49
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.66	2.66	< 0.005	< 0.005	< 0.005	2.79
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.39	1.39	< 0.005	< 0.005	< 0.005	1.41
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.44	0.44	< 0.005	< 0.005	< 0.005	0.46

3.3. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	5.14	6.94	0.01	0.22	—	0.22	0.20	—	0.20	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	5.14	6.94	0.01	0.22	—	0.22	0.20	—	0.20	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.40	0.34	3.36	4.54	0.01	0.14	—	0.14	0.13	—	0.13	—	853	853	0.03	0.01	—	856
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.61	0.83	< 0.005	0.03	—	0.03	0.02	—	0.02	—	141	141	0.01	< 0.005	—	142
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.15	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	30.1	30.1	< 0.005	< 0.005	0.11	30.5
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.3	35.3	< 0.005	< 0.005	0.10	37.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.5	28.5	< 0.005	< 0.005	< 0.005	28.9
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.4	35.4	< 0.005	< 0.005	< 0.005	36.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	18.9	18.9	< 0.005	< 0.005	0.03	19.2
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	23.1	23.1	< 0.005	< 0.005	0.03	24.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.13	3.13	< 0.005	< 0.005	0.01	3.17
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.83	3.83	< 0.005	< 0.005	< 0.005	3.99
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.81	6.91	0.01	0.19	—	0.19	0.17	—	0.17	—	1,304	1,304	0.05	0.01	—	1,309
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.29	0.42	< 0.005	0.01	—	0.01	0.01	—	0.01	—	79.1	79.1	< 0.005	< 0.005	—	79.4
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.1	13.1	< 0.005	< 0.005	—	13.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	0.01	0.01	0.12	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	27.9	27.9	< 0.005	< 0.005	< 0.005	28.3
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	34.7	34.7	< 0.005	< 0.005	< 0.005	36.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.72	1.72	< 0.005	< 0.005	< 0.005	1.74
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.11	2.11	< 0.005	< 0.005	< 0.005	2.20
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.29
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.35	0.35	< 0.005	< 0.005	< 0.005	0.36
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	3.15	3.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.32	7.32	< 0.005	< 0.005	—	7.34
Architectural Coatings	0.17	0.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.21	1.21	< 0.005	< 0.005	—	1.22
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.59	5.59	< 0.005	< 0.005	< 0.005	5.66
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.31
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	1.26	1.16	0.76	8.58	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,979	1,979	0.11	0.08	6.63	2,013
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.26	1.16	0.76	8.58	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,979	1,979	0.11	0.08	6.63	2,013
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	1.24	1.14	0.83	8.03	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,898	1,898	0.11	0.09	0.17	1,926
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.24	1.14	0.83	8.03	0.02	0.01	1.77	1.78	0.01	0.45	0.46	—	1,898	1,898	0.11	0.09	0.17	1,926
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	0.23	0.21	0.15	1.50	< 0.005	< 0.005	0.32	0.32	< 0.005	0.08	0.08	—	318	318	0.02	0.01	0.47	323

Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.23	0.21	0.15	1.50	< 0.005	< 0.005	0.32	0.32	< 0.005	0.08	0.08	—	318	318	0.02	0.01	0.47	323

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	64.2	64.2	0.01	< 0.005	—	64.6
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	64.2	64.2	0.01	< 0.005	—	64.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	64.2	64.2	0.01	< 0.005	—	64.6
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	64.2	64.2	0.01	< 0.005	—	64.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	10.6	10.6	< 0.005	< 0.005	—	10.7
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Total	—	—	—	—	—	—	—	—	—	—	—	—	10.6	10.6	< 0.005	< 0.005	—	10.7

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.7	10.7	< 0.005	< 0.005	—	10.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.78	1.78	< 0.005	< 0.005	—	1.78
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.78	1.78	< 0.005	< 0.005	—	1.78

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.15	0.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.05	0.05	< 0.005	0.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.22	1.22	< 0.005	< 0.005	—	1.22
Total	0.22	0.21	< 0.005	0.30	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.22	1.22	< 0.005	< 0.005	—	1.22
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.15	0.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.16	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landsca Equipment	0.01	0.01	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.14	0.14	< 0.005	< 0.005	—	0.14
Total	0.04	0.04	< 0.005	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.14	0.14	< 0.005	< 0.005	—	0.14

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.96	3.25	4.22	0.10	< 0.005	—	7.41
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.16	0.54	0.70	0.02	< 0.005	—	1.23
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.16	0.54	0.70	0.02	< 0.005	—	1.23

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	3.85	0.00	3.85	0.38	0.00	—	13.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	0.64	0.00	0.64	0.06	0.00	—	2.23
Other Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.64	0.00	0.64	0.06	0.00	—	2.23

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2025	1/31/2025	5.00	23.0	—
Building Construction	Building Construction	2/1/2025	1/31/2026	5.00	260	—

Architectural Coating	Architectural Coating	2/1/2026	3/1/2026	5.00	20.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	6.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	10.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	0.61	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	2.18	18.5	LDA,LDT1,LDT2

Building Construction	Vendor	1.11	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	0.44	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	10,196	3,399	4.50

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	56.0	—

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Strip Mall	0.00	0%
Other Asphalt Surfaces	< 0.005	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	532	0.03	< 0.005
2026	0.00	532	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Strip Mall	370	370	370	135,085	2,495	2,495	2,495	910,843
Other Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

0	0.00	10,196	3,399	4.50

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Strip Mall	67,675	346	0.0330	0.0040	33,469
Other Asphalt Surfaces	0.00	346	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Strip Mall	503,471	0.00
Other Asphalt Surfaces	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Strip Mall	7.14	—

Other Asphalt Surfaces	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	7.73	annual days of extreme heat
Extreme Precipitation	7.05	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth

Wildfire	0.30	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2

Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	58.2
AQ-PM	69.7
AQ-DPM	73.3
Drinking Water	49.6
Lead Risk Housing	26.7
Pesticides	0.00
Toxic Releases	74.0
Traffic	60.7

Effect Indicators	—
CleanUp Sites	80.3
Groundwater	22.1
Haz Waste Facilities/Generators	66.6
Impaired Water Bodies	0.00
Solid Waste	93.7
Sensitive Population	—
Asthma	4.45
Cardio-vascular	18.3
Low Birth Weights	3.40
Socioeconomic Factor Indicators	—
Education	25.9
Housing	87.0
Linguistic	87.0
Poverty	33.8
Unemployment	70.9

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	68.24072886
Employed	40.65186706
Median HI	72.46246632
Education	—
Bachelor's or higher	74.51559091
High school enrollment	4.709354549

Preschool enrollment	67.02168613
Transportation	—
Auto Access	11.40767355
Active commuting	55.1777236
Social	—
2-parent households	85.42281535
Voting	30.52739638
Neighborhood	—
Alcohol availability	22.08392147
Park access	17.55421532
Retail density	98.83228538
Supermarket access	87.86090081
Tree canopy	61.15744899
Housing	—
Homeownership	17.77235981
Housing habitability	14.69267291
Low-inc homeowner severe housing cost burden	3.464647761
Low-inc renter severe housing cost burden	49.04401386
Uncrowded housing	62.10701912
Health Outcomes	—
Insured adults	74.51559091
Arthritis	0.0
Asthma ER Admissions	95.8
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0

Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	92.8
Cognitively Disabled	20.1
Physically Disabled	5.6
Heart Attack ER Admissions	85.8
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	68.9
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	90.2
Elderly	3.7
English Speaking	10.3
Foreign-born	93.1
Outdoor Workers	95.0
Climate Change Adaptive Capacity	—
Impervious Surface Cover	17.3
Traffic Density	77.2

Traffic Access	87.4
Other Indices	—
Hardship	42.9
Other Decision Support	—
2016 Voting	29.1

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	44.0
Healthy Places Index Score for Project Location (b)	49.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	No site prep, grading, or paving; using provided construction total length of 14 months
Operations: Vehicle Data	Based on project trip generation

Appendix F

Noise and Vibration Analysis

Kimley»Horn

MEMORANDUM

To:	Minjee Hahm, AICP Associate Planner City of Beverly Hills
From:	Olivia Chan and Dharma Truong
Date:	September 6, 2024
Subject:	450 North Roxbury Drive Project – Noise and Vibration Analysis

Purpose

The purpose of this memorandum is to assess potential impacts due to noise and vibration impacts associated with construction and operations of the 450 North Roxbury Drive Project (Project), located in the City of Beverly Hills (City), California.

Project Location

The Project would redevelop a 6,797 square foot portion of the ground floor of a five-floor, partially subterranean parking garage (the upper two levels are above ground) with rooftop parking located on a 0.8-acre parcel (Assessor's Parcel Number [APN] 4343-024-020) (Project Site); see **Figure 1: Local Vicinity Map**. The five-floor parking garage is attached to a 10-story, 155-foot-tall office building located on the northern portion of the same parcel, constructed in 1970. The parking garage and office building together are considered the Project Site; however, the remainder of the parking garage and the attached office building would not be redeveloped as part of this Project. The Project Site is bound by Santa Monica Boulevard to the north, Bram Goldsmith Way (an alley) to the east, an existing commercial building to the south, and North Roxbury Drive to the west. The Project Site is in the southwestern portion of the City, in Los Angeles County (County), approximately 3.0 miles north of Culver City and 8.5 miles west of downtown Los Angeles; see **Figure 2: Regional Vicinity Map**.

Project Description

The Project would convert a portion of the ground level of the existing parking garage to approximately 6,797 square feet of retail uses, split into four retail spaces ranging from 1,397 square feet to 1,841 square feet. The retail spaces would be accessed from the North Roxbury Drive street frontage. Storefront facades would consist of louvers, cast-in-place (CIP) concrete, and storefront glazing, with signage installed on top. Approximately 300 square feet of planter area would also be added; see **Figure 3: Conceptual Site Plan**.

SOURCE: Google Earth, 2024

FIGURE 1: Local Vicinty Map

450 NORTH ROXBURY DRIVE PROJECT

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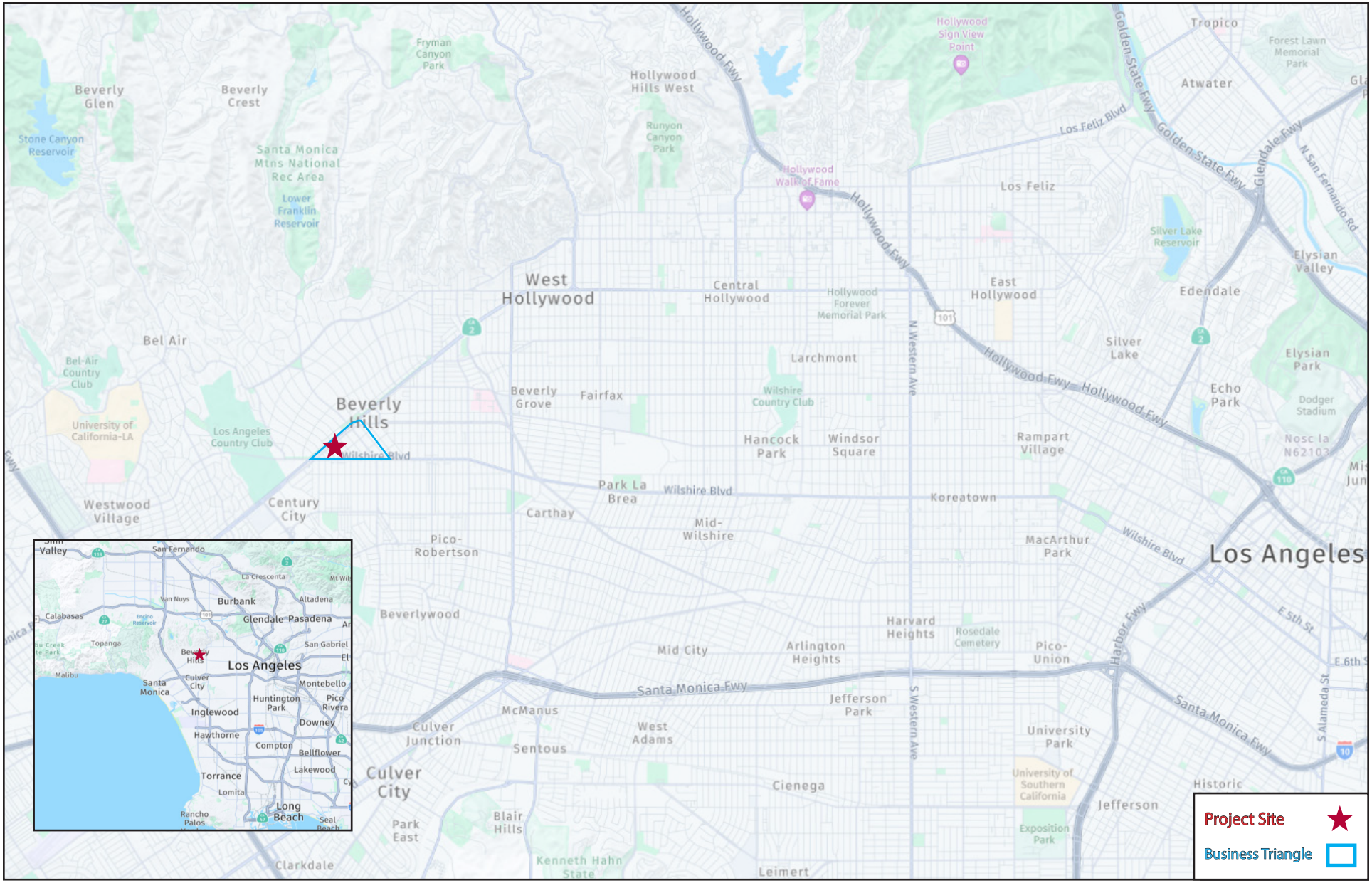

SOURCE: Nearmap, 2024

FIGURE 2: Regional Vicinty Map

450 NORTH ROXBURY DRIVE PROJECT

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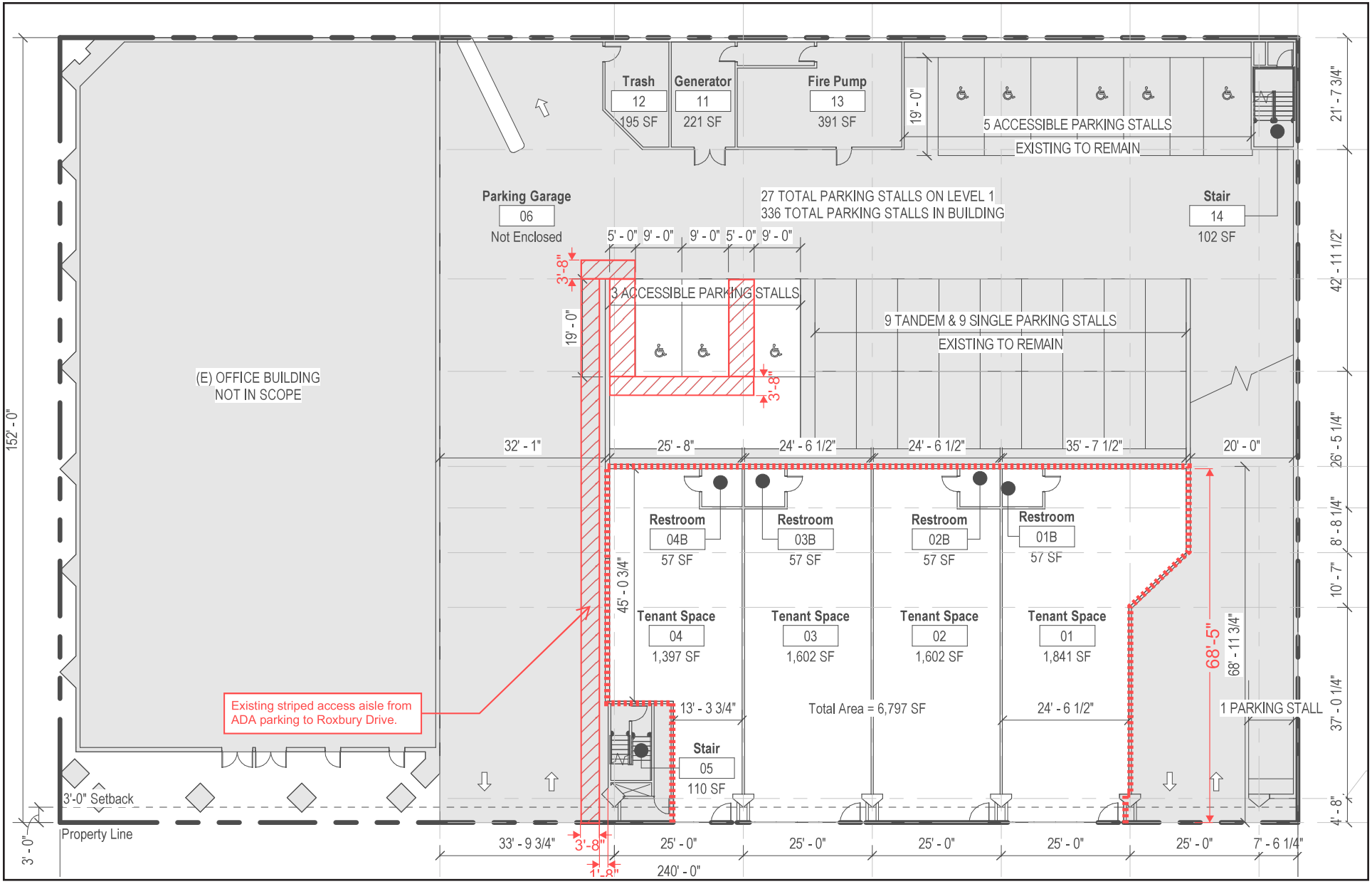


SOURCE: HLW International LLP, 2024

FIGURE 3: Conceptual Site Plan

450 NORTH ROXBURY DRIVE PROJECT

Kimley»Horn

The Applicant is requesting a Zone Text Amendment (ZTA) and General Plan Amendment (GPA) to allow an increase in the maximum FAR as a result of the conversion of the ground level of an existing parking structure abutting a public street to retail business(es), as defined in Beverly Hills Municipal Code (BHMC) Section 10-3-100, up to a depth of 70 feet from the front property line, subject to approval of a Development Plan Review pursuant to BHMC Section 10-3-3100.[1] In compliance with the proposed ZTA and GPA, the Project is proposing a conversion of 6,797 square feet of an existing parking structure, resulting in a new total of 103,647 square feet of proposed floor area. Pursuant to BHMC Section 10-3-2745, the maximum allowable floor area for the Project Site is 72,960 square feet. Therefore, the 6,797 square feet conversion is approximately 9.3 percent of the existing building square footage (96,850 square feet) and would be less than 10 percent of the maximum allowable floor area for the site.

The Project would remove 29 existing parking spaces (including 24 single parking spaces and five tandem parking spaces) on the ground floor and restripe the remaining ground level of parking to replace the 3 ADA spaces, which would be relocated to be adjacent to the northeastern end of the proposed retail spaces. Vehicular access to the Project Site would continue to be provided via the two existing in/out driveways on North Roxbury Drive. Pedestrian access would continue to be provided via the existing sidewalk along North Roxbury Drive. The Project would not modify the existing driveways and sidewalk.

A new mechanical split heating, ventilation, and air conditioning (HVAC) system would be installed above the ceilings of the retail spaces. A new rooftop HVAC unit would be provided immediately south of an existing HVAC unit on the rooftop of the parking garage. The Project would also install four 5-ton heat pump condensers along the western edge of the rooftop. An automated sprinkler system would also be installed within the retail spaces for fire protection purposes, including a fire pump on the eastern portion of the Project Site.

Project construction would include the demolition of the existing building façade, flooring, and planters, building construction, and architectural coatings. Demolition activities would require the use of haul trucks. No grading or excavation will be required to construct this Project. Project construction is anticipated to begin as early as January 2025 and would be completed as early as February 2026. Construction of the Project is estimated to require approximately 14 months.

Noise Background

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been

[1] The ZTA and GPA would apply to the entire Business Triangle of the City; however, future projects that would seek to utilize the ZTA and GPA would be subject to environmental review at such time.

devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear. Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady ambient noise that is the sum of various distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise as well as the time of day when the noise occurs. For example, the equivalent continuous sound level (L_{eq}) is the average acoustic energy content of noise for a stated period of time; thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. The Day-Night Sound Level (L_{dn}) is a 24-hour average L_{eq} with a 10 dBA "weighting" added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the nighttime. The Community Noise Equivalent Level (CNEL) is a 24-hour average L_{eq} with a 10 dBA weighting added to noise during the hours of 10:00 P.M. to 7:00 A.M. and an additional 5 dBA weighting during the hours of 7:00 P.M. to 10:00 P.M. to account for noise sensitivity in the evening and nighttime.

Regulatory Setting

Federal Noise and Vibration Standards

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project. Under the Occupational Safety and Health Act of 1970 (29 United States Code [U.S.C.] Section 1919 et seq.), the Occupational Safety and Health Administration (OSHA) has adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring the noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.

State of California Noise Standards

The State of California does not have standards for environmental noise, but the Governor's Office of Planning and Research (OPR) has established general plan guidelines for evaluating the compatibility of various land uses as a function of community noise exposure.[2] The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise

[2] State of California Governor's Office of Planning and Research, General Plan Guidelines, Appendix D: Noise Element Guidelines, page 374, 2017, https://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf. Accessed July 18, 2024.

compatibility by different land use types is categorized into four general levels: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable."

For instance, a noise environment ranging from 50 dBA CNEL to 65 dBA CNEL is considered to be "normally acceptable" for multi-family residential uses, while a noise environment of 75 dBA CNEL or above for multi-family residential uses is considered to be "clearly unacceptable. In addition, California Government Code Section 65302(f) requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with California Government Code Section 65302(f) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

Groundborne Vibration

The California Department of Transportation' (Caltrans) *Transportation and Construction Vibration Manual* provides thresholds of vibration for human annoyance. Based on the Caltrans criteria, construction vibration impacts would be significant if vibration levels exceed 0.5 inches per second (in/sec) peak particle velocity (PPV) at older residential structures, which is the limit for potential building damage at these structures.[3]

City of Beverly Hills General Plan

The City of Beverly Hills Noise Standards are developed from those of several federal and State agencies including the Federal Highway Administration (FHWA), the United States Environmental Protection Agency (U.S. EPA), the Department of Housing and Urban Development, the American National Standards Institute (ANSI), and the State of California Department of Health Services. These standards set limits on the noise exposure level for various land uses. As with the California Noise Standards described above, these General Plan standards are related to the siting of land uses and are not typically used as thresholds of significance for determining noise impacts associated with construction and operation of the Project. However, the standards do provide a means for judging whether an existing noise environment would be compatible with development of a new noise-sensitive land use or whether a new use would create an incompatible noise environment for existing noise-sensitive uses. The City of Beverly Hills General Plan (BHGP) provides noise and land use compatibly criteria in Noise Element Table N-2 (Table 1: Land Use Noise Compatibility Matrix).

[3] Caltrans, *Transportation and Construction Vibration Guidance Manual,* 2020.

Table 1: Land Use Noise Compatibility Matrix				
Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential (Low-Density Single Family, Duplex, Mobile Homes)	50 – 60	55 - 70	70 - 75	75 - 85
Residential (Multiple Family)	50 – 65	60 - 70	70 - 75	70 - 85
Transient Lodging (Hotel, Motel)	50 - 65	60 - 70	70 - 80	80-85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 - 70	70 - 80	80 - 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 - 70	NA	60 – 85
Sports Arena, Outdoor Spectator Sports	NA	50 - 75	NA	65 - 85
Playgrounds, Neighborhood Parks	50 - 70	NA	67.5 – 75.5	70 - 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 70	NA	70 - 80	72.5 - 85
Office Buildings, Business Commercial and Professional	50 – 75	67.5 – 77.5	75 - 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	75 - 85	NA
NA: Not Applicable; dBA: Decibel				
Notes: Normally Acceptable – Specified land use is satisfactory, assuming buildings are of conventional construction. Conditionally Acceptable – New development should be undertaken only after detailed analysis of noise reduction requirements are made. Normally Unacceptable – New development should be discouraged, or a detailed analysis of noise reduction requirements must be made. Clearly Unacceptable – New development should generally not be undertaken.				
Source: City of Beverly Hills, *Beverly City General Plan, Appendix B: Land Use Noise Compatibility Guidelines, Table N 2: Land Use/Noise Compatibility Matrix*, 2010. Source: State of California Governor's Office of Planning and Research, General Plan Guidelines, Appendix D: Noise Element Guidelines, page 374, 2017, https://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf. Accessed July 18, 2024				

The compatibility criteria presented in Noise Element Table N-2 (Table 1: Land Use Noise Compatibility Matrix) above indicate that residential (multiple family) land uses are considered "Normally Acceptable" with noise levels below 65 dBA L_{dn}, "Conditionally Acceptable" with noise levels between 60-70 dBA L_{dn}, normally unacceptable with noise levels between 70-75 dBA L_{dn}, and clearly unacceptable between 70-85 dBA L_{dn}.

Residential dwellings are a concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as schools, churches, and libraries are considered sensitive to increases in exterior noise levels. The nearest sensitive receptors to the Project Site are a church and residential communities located approximately 350 feet northwest of the Project Site.

Beverly Hills General Plan

The Noise Element of the General Plan provides specific objectives to ensure that City residents will be protected from excessive noise. The following policies are applicable to the Project:

Policy N 1.1 Revise the noise regulations of the Municipal Code to eliminate current ambient noise level standards in residential and commercial areas and replace them with Land Use Noise Compatibility Matrix (Appendix B [of the Noise Element]), to govern acceptable levels of noise for specific land uses and provide a baseline for mitigating land uses that exceed acceptable noise levels.

Policy N 1.2 Consider developing standards for new high-density residential development that adequately minimize noise between adjacent units within the development and between the development and adjacent buildings through the use of design features and building materials such as orientation, window insulation, common wall separation, common floor/ceilings separation.

Policy N 1.3 Limit hours of commercial and entertainment operations adjacent to residential neighborhoods and other noise-sensitive receptors in order to minimize exposure to excessive noise.

Policy N 1.4 Limit the hours of truck deliveries to commercial uses abutting residential neighborhoods and other noise-sensitive receptors in order to minimize exposure to excessive noise, unless there is no feasible alternative or there are overriding transportation benefits by scheduling deliveries at other hours

Policy N 1.5 Require noise mitigation measures for noise-sensitive receptors when a significant noise impact is identified. A significant noise impact occurs when there is an increase in CNEL, as shown in the table below

Policy N 1.6 In Beverly Hills, it is against the law to operate equipment or perform any outside construction or repair work on any building, structure, pneumatic hammer, derrick, steam or electric hoist, or other construction type devices, between the hours of 6:00 P.M. of one day and 8:00 A.M. of the next day, or at any time on any public holiday so as to cause discomfort or annoyance in a residential zone, unless beforehand a permit therefore has been obtained.

Policy N 2.1 Require that the design of new residential or other new noise sensitive land uses within the 60 dBA and 65 dBA CNEL (and higher) roadway contours demonstrate that the project will meet interior and exterior noise standards. Require the use of interior noise insulation, double paned windows, or other noise mitigation measures, as appropriate, to achieve required standards.

Policy N 3.1 Continue to enforce interior and exterior noise standards to ensure that sensitive noise receptors are not exposed to excessive noise levels from stationary noise sources such as machinery, equipment, fans, and air conditioning equipment

Policy N 3.2 Continue to regulate the use of sound-amplifying equipment.

Policy N.4.1 Continue to enforce restrictions on hours of construction activity to minimize the impact of noise and vibration from trucks, heavy drilling equipment, and other heavy machinery on adjacent noise-sensitive receptors, particularly in and near residential areas.

City of Beverly Hills Municipal Code

City of Beverly Hills City Municipal Code (BHMC) Title 5, Chapter 1, Noise Regulations provides specific noise restrictions and exemptions for noise sources within the City. BHMC Section 5-1-205 states that construction activity shall be prohibited between the hours of 6:00 P.M. and 8:00 A.M. any day, or at any time on Saturday, Sunday, or a holiday without an after hours permit pursuant to subsection C. Noise level at the property line shall not exceed the ambient noise level by more than five decibels.

Existing Noise Levels

Mobile noise sources, especially cars, trucks motorcycles, and aircrafts, are the City's most common and substantial noise sources. The existing mobile noise sources in the Project area are the motor vehicles traveling on Santa Monica Boulevard, Bram Goldsmith Way, North Roxbury Drive, and State Route 2 (SR-2). The primary stationary noise sources in the Project vicinity are those associated with the surrounding residential uses. Such stationary noise sources include mechanical equipment (e.g., HVAC equipment), moving vehicles, music playing, dogs barking, and people talking. The noise associated with these sources may represent a single-event noise occurrence or short-term noise.

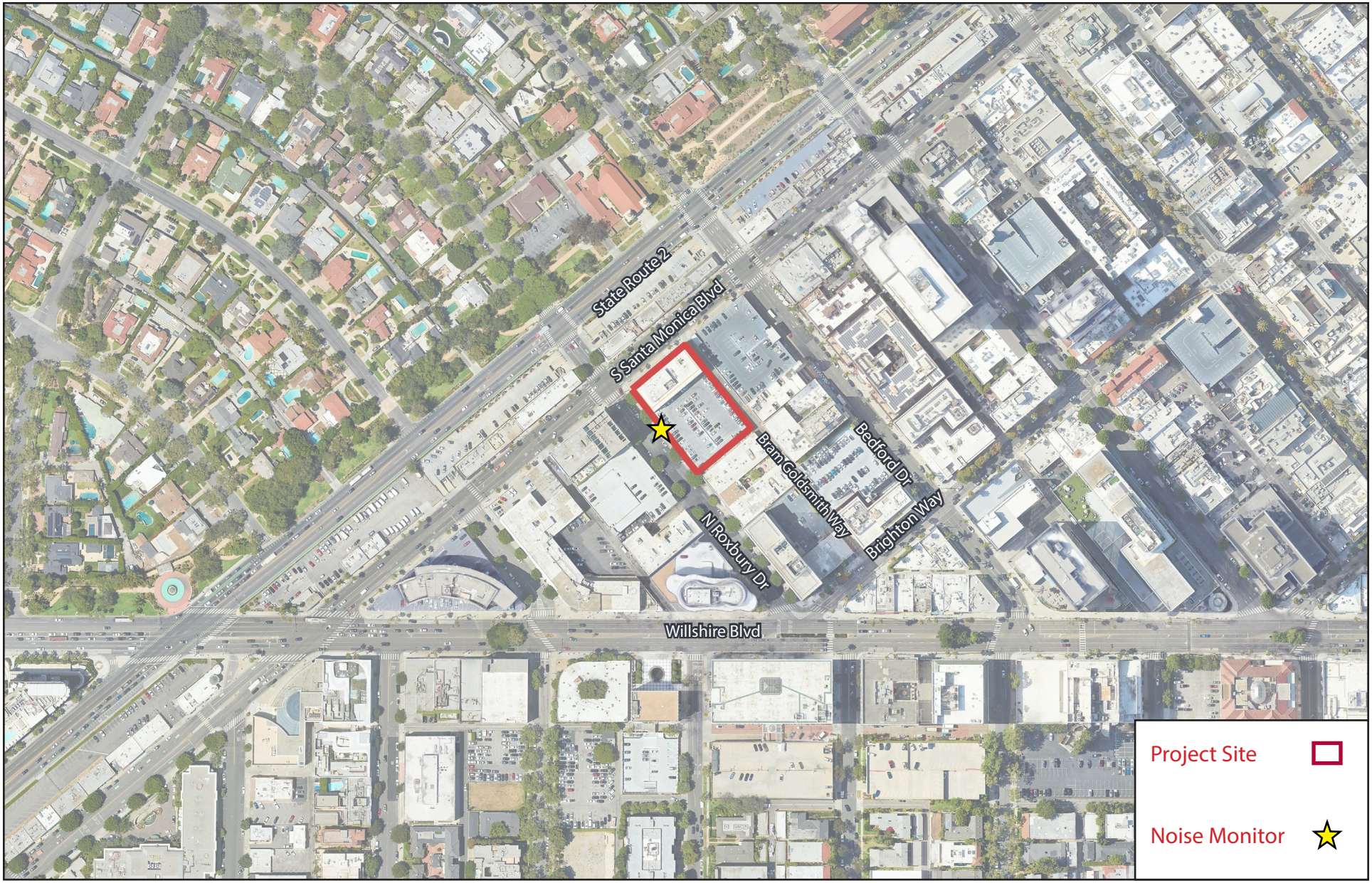
Existing Ambient Noise Levels

To quantify existing ambient noise levels in the Project area, Kimley-Horn conducted one long-term noise measurement on July 9, 2024; see Appendix A: Noise Data. The noise measurement site was representative of typical existing noise exposure within and immediately adjacent to the Project Site. The 24-hour measurement was taken between 8:04 A.M. on July 9, 2024 to 8:04 A.M. on July 10, 2024. Measurements of L_{eq} are considered representative of the noise levels throughout the day, and summarized in Table 2: Existing Noise Measurement, below. The sources of noise measured at each location are shown on **Figure 4: Noise Measurement Location**.

Table 2: Existing Noise Measurement

Location	Day (dBA L_{eq})	Night (dBA L_{eq})	Time
Along North Roxbury Drive	64.1	59.7	July 9, 2024 8:04 A.M. – July 10, 2024 8:04 A.M.

Source: Noise measurement taken by Kimley-Horn, July 9, 2024. See Appendix A for noise measurement results.



SOURCE: Google Earth, 20

FIGURE 4: Noise Measurement Location

450 NORTH ROXBURY DRIVE PROJECT

Kimley»Horn

Noise Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect varying noise sensitivities associated with uses. Land uses considered sensitive receptors include residences, schools, playgrounds, childcare centers, long-term health facilities, rehabilitation centers, convalescent centers, and retirement homes. The nearest sensitive receptors to the Project Site consist mostly of a church and residential communities located approximately 350 northwest of the Project Site.

Construction Noise

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction. Noise generated by construction equipment can reach high levels. During construction, exterior noise levels could affect the noise-sensitive receptors near the construction site.

The proposed construction activities would require tractors, concrete saws, and dozers during demolition; cranes, forklifts, and tractors during building construction; and air compressors during architectural coatings. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including dozers, excavators, loaders, forklifts, and air compressors, can reach high levels. L_{max} is the maximum level of a noise source environment and is often used as a threshold value for typical noise levels of construction activities. Typical noise levels associated with individual construction equipment are listed in Table 3: Typical Construction Noise Levels.

Table 3: Typical Construction Noise Levels

Equipment	Typical Noise Level (dBA L_{max}) at 50 feet from Source
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Jack Hammer	88
Loader	80
Paver	85
Pneumatic Tool	85
Pump	77
Roller	85

Table 3: Typical Construction Noise Levels	
Equipment	**Typical Noise Level (dBA L_{max}) at 50 feet from Source**
Saw	76
Shovel	82
Truck	84
1. Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1+20Log(d_1/d_2)$	
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.	

Daytime construction noise is not typically a concern for human health and is a common occurrence within the urban environment. The impact analysis is based on the potential temporary increase in ambient noise and the construction time limits in the BHMC Section 5-1-205 including the allowable hours of hours of construction. Construction activity would occur within the allowable hours of construction including Mondays through Fridays 8:00 A.M. to 6:00 P.M. Construction is prohibited outside of these hours and on holidays.

The FHWA Roadway Construction Noise Model (RCNM) was used to calculate the worst-case construction noise levels at nearby sensitive receptors surrounding the Project Site during construction. All construction equipment was assumed to operate simultaneously and at the center of the Project Site to represent a worst-case noise scenario, as construction activities would routinely be spread throughout the construction site and would operate at different intervals. The modeled receptor locations represent the closest existing receiving land uses to Project construction activities. Noise levels at other sensitive receptors surrounding the Project Site would be located further away and would experience lower construction noise levels than the closest receptors modeled. Table 4: Project Construction Noise Levels shows estimated exterior daytime noise levels for each construction phase at the closest receptors without accounting for attenuation from intervening barriers, structures, or topography.

Table 4: Project Construction Noise Levels				
Construction Phase	**Land Use**	**Receptor Location**		
		Direction	**Distance (feet)[1]**	**Exterior Noise Level (dBA L_{eq})**
Demolition	Residential/ Church	Northwest	410	68.2
Building Construction	Residential/ Church	Northwest	410	67.7
Architectural Coating	Residential/ Church	Northwest	410	55.4
1. Per the methodology described in the FTA *Transit Noise and Vibration Impact Assessment Manual* (September 2018), distances are measured from the nearby buildings to the center of the Project construction site.				
Source: Federal Highway Administration, *Roadway Construction Noise Model,* 2006. Refer to Appendix A for noise modeling results.				

Although the noise generated by Project construction would be higher than ambient noise levels, which may result in a temporary increase in ambient noise levels, construction would be temporary and cease once Project construction is completed. Construction activities would comply with BHMC Section 5-1-205 and would be prohibited outside the hours of Mondays through Fridays 8:00 A.M. to 6:00 P.M. While construction may cause short-term annoyance to adjacent uses, it would be

temporary and restricted to the hours permitted by the City's noise ordinance. In addition, BHMC Section 5-1-205 states that construction work is prohibited any time on Saturdays within a residential zone or within five hundred feet of a residential zone unless issued an after hours construction permit. Therefore, construction noise impacts would be less than significant.

Operational Noise

Project implementation would introduce new noise sources in the Project vicinity. The Project's primary noise sources that could potentially impact nearby noise-sensitive land uses include mechanical equipment (e.g., HVAC, etc.) and trash/recycling truck pickup noise.

Mechanical Equipment

Potential stationary noise sources related to long-term Project operations include mechanical equipment (e.g., HVAC equipment). Mechanical equipment typically generates noise levels of approximately 52 dBA at 50 feet.[4] Noise has a decay rate due to distance attenuation, which is calculated based on the Inverse Square Law of sound propagation. Based upon the Inverse Square Law, sound levels decrease by 6 dBA for each doubling of distance from the noise source. Typically, a 5 dBA change in noise levels is required before any noticeable change in community response would be expected.[5] HVAC equipment would be installed on the roof the Project Site south of an existing HVAC unit. The nearest sensitive receptors would be located 250 feet northwest from the HVAC equipment. As indicated in Table 5: On-Site Composite Noise Levels, noise levels from mechanical equipment at the Project Site would be 38.0 dBA L_{eq} at the nearest residential uses to the northwest and would not result in increases of 5 dBA L_{eq} over ambient conditions. Furthermore, HVAC equipment operations currently occur under existing conditions and would not be a new noise source. Therefore, the Project would result in a less than significant impact concerning mechanical equipment noise levels.

Trash/Recycling Truck Pickups

During loading and unloading activities of trash and recycling pickups, noise would be generated by the trucks' diesel engines, exhaust systems, and brakes during low gear shifting' braking activities, as well as the opening and closing of the trash/recycling bins. Trash/recycling truck pickup noise is typically 41.4 dBA L_{eq} at 50 feet.[6] The trash room is located on the ground level. It is conservatively assumed that trash/recycling would occur along North Roxbury Drive, approximately 250 feet southeast of the nearest sensitive receptor (when measured from the trash room location rather than the parking lot boundary). Trash/recycling truck pickup noise would attenuate to approximately 27.4 dBA at the nearest noise receptors. As indicated in Table 5, noise levels from trash/recycling truck

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4 Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, Noise Navigator Sound Level Database with Over 1700 Measurement Values, June 26, 2015.

5 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, and FHWA, Noise Fundamentals, 2017.

6 Kariel, H. G., Noise in Rural Recreational Environments, Canadian Acoustics 19(5), 3-10, 1991.

pickup at the Project Site would not result in increases of 5 dBA L_{eq} over ambient conditions at the nearest affected sensitive receptors. In addition, trash/recycling truck pickup activity servicing the Project area currently occurs under existing conditions and would not be a new noise source. The hours of trash/recycling pick up activity would be dependent on the service provider and not be regulated by the Project. Therefore, the Project would result in less than significant impacts concerning trash/recycling truck pickup noise levels.

Composite On-Site Noise Levels

An evaluation of the combined noise levels from the Project's various operational noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Project-related noise level increase that may occur at the nearest noise-sensitive receptors. In general, an increase of 3 dBA is considered to be barely perceptible, and a 5 dBA change in noise levels is required before any noticeable change in community response would be expected. Table 5 details the on-site noise levels from the Project Site at the nearest residential uses located approximately 250 feet away from mechanical and trash/recycling activities. As shown in Table 5, the composite on-site operational noise attributable to the Project would not increase ambient conditions at the residential uses. Composite noise levels would not exceed the FTA's (3 dBA) annoyance criteria or the City's (65 dBA CNEL) standard for exterior noise. Therefore, the Project would not result in a significant permanent increase in ambient noise levels.

Table 5: On-Site Composite Noise Levels

Receptor	Maximum On-Site Noise Levels by Source (dBA L_{eq})		Combined Noise Level at Receptor (dBA L_{eq})	Ambient Noise Level (dBA L_{eq})[1]	Ambient + Combined Project Noise (dBA L_{eq})	Incremental Increase over Ambient (dBA L_{eq})
	Mechanical Equipment	Trash/ Recycling				
Residential Community	38.0	27.4	38.4	64.1	64.1	0.0

1. See Table 2 for measured ambient noise level.

Construction Traffic Noise

In addition to on-site construction noise, the project would generate mobile-source noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the project's construction. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a barely perceptible 3-dBA increase.[7]

Haul trucks would travel to and from the Project Site using North Roxbury Drive. Haul and delivery trucks and construction workers are expected to arrive at the Project Site before construction starts

[7] According to the California Department of Transportation, Technical Noise Supplement to Traffic Noise Analysis Protocol (September 2013), it takes a doubling of traffic to create a noticeable (i.e., 3 dBA) noise increase.

and leave when construction ends, and thus, would not overlap with the noise generated by the project's construction equipment. It is reasonable to assume that workers would already have arrived at the Project Site to begin demolition activities prior to the arrival of haul trucks. The greatest contributor to on-road traffic noise during construction would be haul trucks arriving from SR-2 to the Project Site along North Roxbury Drive. Therefore, this analysis only considers noise generated by haul trucks. According to modeling assumptions included in the air quality assessment prepared by Kimley-Horn in July 2024, the construction phase with the highest assumed number of haul trucks would be demolition, when it is assumed there would be up to 1 daily haul truck trip accessing the Project Site. Assuming that 1 haul truck would pass through the roadway segment along North Roxbury Drive within a 15-minute period, the estimated noise level from the demolition phase haul truck trips would be 48.5 dBA L_{eq} at 50 feet from the roadway centerline. The estimated worst-case noise level would not result in increases of 5 dBA L_{eq} over ambient conditions or increases above the barely perceivable (3dBA) criteria. In addition, 1 daily haul truck trip would not double existing traffic volumes along North Roxbury Drive and thus would not increase noise levels compared to existing conditions. Therefore, noise impacts from construction traffic would be less than significant.

Mobile Traffic Noise

The Project is anticipated to generate 370 net daily trips.[8] In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a barely perceptible 3-dBA increase.[9] Roxbury Drive (the primary access roadway to the Project Site) has an average daily traffic (ADT) volume of approximately 6,286 vehicles.[10] The Project would result in approximately 370 net daily trips, which would not double the existing traffic volumes on North Roxbury Drive. Therefore, the Project would not result not result in increases of 5 dBA L_{eq} over ambient conditions or increases above the barely perceivable (3dBA) criteria. Noise impacts from Project-related traffic noise would be less than significant.

Vibration

Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term construction-related activities. Project construction could result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved.

The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human

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8 The Project's daily vehicle trips are based on Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition.

9 According to the California Department of Transportation, Technical Noise Supplement to Traffic Noise Analysis Protocol (September 2013), it takes a doubling of traffic to create a noticeable (i.e., 3 dBA) noise increase.

10 Replica HQ, Annual Average Daily Traffic 2023 for the City of Beverly Hills, https://www.replicahq.com/, accessed July 2024.

perception for extended periods of time. Building damage can be cosmetic or structural. The City has not adopted specific standards for vibration impacts during construction. Therefore, the Caltrans *Transportation and Construction Vibration Guidance* Manual (2020) is used to evaluate construction vibration impacts related to potential building damage. As the closest structure is a commercial building, this evaluation uses the Caltrans architectural damage criterion for continuous vibrations at commercial buildings of 0.5 in/sec PPV and the severe human annoyance criterion of 0.4 in/sec PPV.

Table 6: Typical Construction Equipment Vibration Levels identifies vibration velocity levels at 25 feet and at the nearest receptor for the type of equipment likely to operate at the Project Site during construction. As the Project would redevelop an attached parking lot into a commercial space, demolition, grading, and paving would not occur. Furthermore, construction activities would occur as close as 1 foot from an adjacent building. Due to existing site restrictions, a large bulldozer would not be utilized during construction.

Table 6: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 25 feet (in/sec)	Peak Particle Velocity at 1 foot (in/sec)[1]
Small Bulldozer/Tractors	0.003	0.375
Structure Damage Threshold	**0.5**	**0.5**
Exceeds Threshold?	**No**	**No**

[1] Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance; PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018; D = the distance from the equipment to the receiver.

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

As shown in Table 6**,** the vibration velocities from construction would not exceed the Caltrans's architectural damage criterion (0.5 in/sec PPV) or human annoyance criterion (0.4 in/sec PPV) at 1 foot from the Project Site. Construction activities would occur throughout the Project Site and would not be concentrated at the point closest to the nearest building/structure. Therefore, the frequency of vibration events would be intermittent and temporary. The vibration impact from the construction equipment would be less than significant.

Conclusion

The Project's construction and operational noise and vibration levels would not exceed applicable City or Caltrans standards. The Project would result in less than significant construction and operational noise and vibration impacts, and no mitigation is required.

REFERENCES

1. California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013, and FHWA, Noise Fundamentals, 2017.

2. California Department of Transportation, Technical Noise Supplement to Traffic Noise Analysis Protocol (September 2013)

3. Caltrans, Transportation and Construction Vibration Guidance Manual, 2020

4. Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden, Noise Navigator Sound Level Database with Over 1700 Measurement Values, June 26, 2015.

5. Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition.

6. Kariel, H. G., Noise in Rural Recreational Environments, Canadian Acoustics 19(5), 3-10, 1991.

7. Replica HQ, Annual Average Daily Traffic 2023 for the City of Beverly Hills, https://www.replicahq.com/.

8. State of California Governor's Office of Planning and Research, General Plan Guidelines, Appendix D: Noise Element Guidelines, page 374, 2017, https://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf.

Appendix A

Noise Data

Noise Measurement Field Data

Project:	450 N Roxbury	**Job Number:**	099867003
Site No.:	LT-1	**Date:**	7/9-7/10 2024
Analyst:	Kennedy Caudle and Ciara Anderson	**Time:**	
Location:	Planter box on project site		
Noise Sources:	Traffic along N Roxbury Drive and S Santa Monica Blvd		
Comments:	24-hour noise measurement		

Results (dBA):

Leq:	Lmin:	Lmax:	Peak:
62.9	43.5	87.7	111.6

Equipment	
Sound Level Meter:	LD SoundExpert LxT
Calibrator:	CAL200
Response Time:	Slow
Weighting:	A
Microphone Height:	5 feet

Weather	
Temp. (degrees F):	67
Wind (mph):	5
Sky:	Clear
Bar. Pressure:	29.82
Humidity:	70%

Photo:

Kimley»Horn

Measurement Report

Report Summary

Meter's File Name	ST_.050.s	Computer's File Name	LxTse_0005586-20240709 080452-ST_.050.ldbin
Meter	LxT SE 0005586	Firmware	2.404
User		Location	
Job Description			
Note			

Start Time	2024-07-09 08:04:52	Duration	24:00:00.0		
End Time	2024-07-10 08:04:52	Run Time	24:00:00.0	Pause Time	0:00:00.0
Pre-Calibration	2024-07-08 15:29:24	Post-Calibration	None	Calibration Deviation	---

Results

Overall Metrics

LA_{eq}	62.9 dB		
LAE	112.3 dB	SEA	--- dB
EA	18.7 mPa²h		
LA_{peak}	111.6 dB	2024-07-09 12:08:24	
LAS_{max}	87.7 dB	2024-07-09 10:31:13	
LAS_{min}	43.5 dB	2024-07-10 02:23:40	
LA_{eq}	62.9 dB		
LC_{eq}	74.8 dB	LC_{eq} - LA_{eq}	11.9 dB
LAI_{eq}	65.8 dB	LAI_{eq} - LA_{eq}	2.9 dB

Exceedances	Count	Duration
LAS > 85.0 dB	10	0:00:18.2
LAS > 115.0 dB	0	0:00:00.0
LApk > 135.0 dB	0	0:00:00.0
LApk > 137.0 dB	0	0:00:00.0
LApk > 140.0 dB	0	0:00:00.0

Community Noise	L_{DN}	L_{Day}	L_{Night}
	67.1 dB	64.1 dB	0.0 dB

	L_{DEN}	L_{Day}	L_{Eve}	L_{Night}
	67.4 dB	64.5 dB	61.8 dB	59.7 dB

Any Data	A		C		Z	
	Level	Time Stamp	Level	Time Stamp	Level	Time Stamp
L_{eq}	62.9 dB		74.8 dB		--- dB	
$LS_{(max)}$	87.7 dB	2024-07-09 10:31:13	--- dB	None	--- dB	None
$LS_{(min)}$	43.5 dB	2024-07-10 02:23:40	--- dB	None	--- dB	None
$L_{Peak(max)}$	111.6 dB	2024-07-09 12:08:24	--- dB	None	--- dB	None

Overloads	Count	Duration	OBA Count	OBA Duration
	0	0:00:00.0	0	0:00:00.0

Statistics

LAS 5.0	68.0 dB
LAS 10.0	65.6 dB
LAS 33.3	61.6 dB
LAS 50.0	59.6 dB
LAS 66.6	56.3 dB
LAS 90.0	47.1 dB

Project: **450 N Roxbury**

Construction Noise Impact on Sensitive Receptors

Parameters

Construction Hours:	Daytime hours (8 am to 6 pm)	11
	Evening hours (7 pm to 10 pm)	0
	Nighttime hours (6 pm to 8 am)	0
Leq to L10 factor		3

	Receptor (Land Use)	Average Distance (feet)	Distance to Property Line (feet)	Shielding	Direction
1	Residential Community/Church	410	350	0	NW

Construction Phase	Equipment Type	No. of Equip.	Acoustical Usage Factor	Reference Noise Level at 50ft per Unit, Lmax	RECEPTOR 1 Distance (feet)	Noise Level at Receptor 1, Lmax	Noise Level at Receptor 1, Leq
Demolition							
	Concrete Saw	1	20%	90	410	71.3	64.3
	Tractor	2	40%	84	410	68.7	64.8
	Dozer	1	40%	82	410	63.4	59.4
	Combined LEQ						**68.2**
Building Construction							
	All Other Equipment > 5 HP	1	50%	85	410	66.7	63.7
	Tractor	2	40%	84	410	68.7	64.8
	Crane	2	16%	81	410	65.3	57.4
	Combined LEQ						**67.7**
Architectural Coating							
	Compressor (air)	1	40%	78	410	59.4	55.4
	Combined LEQ						**55.4**

Source for Ref. Noise Levels: RCNM, 2005

Appendix G

Assembly Bill 52 and Senate Bill 18
Communications

Kimley»Horn

July 9, 2024

Cahuilla Band of Indians
BobbyRay Esaprza, Cultural Director
52701 CA Highway 371
Anza, CA 92539
Via Email: besparza@cahuilla-nsn.gov

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Director BobbyRay Esaprza:

The City of Beverly Hills (City) is preparing an Initial Study/Negative Declaration (IS/ND) for the proposed 450 North Roxbury Drive Project (Project). The Project is located at 450 North Roxbury Road in the City of Beverly Hills within Township 1 South and Range 15 West of the United States Geological Survey (USGS) Beverly Hills 7.5 minute quadrangle. The Project area is currently developed and contains a high-rise office building and attached parking garage. The Project area is surrounded by a mix of commercial and residential development and is bounded by Santa Monica Blvd./SR-2 to the northwest, Bram Goldsmith Way to the northeast, North Roxbury Drive to the southwest, and a medical office to the southeast. The Project proposes to rehabilitate a portion of the first floor of the existing garage into four retail spaces totaling approximately 6,797 square feet. The Project would retain the parking spaces on the two below ground levels, the northern portion of the ground floor, the entirety of the second above-ground level, and entirety of the roof, as well as retain the vehicle entries and exits on the east and west ends of the garage. The Project Site is fully built out, and no further ground disturbance at the Project Site is contemplated by the Project.

The proposed Project must comply with California Public Resources Code § 21080.3.1 (Assembly Bill [AB] 52 of 2014), which requires local governments to conduct meaningful consultation with California Native American Tribes that have requested to be notified by lead agencies of proposed Projects in the geographic area with which the Tribe is traditionally and culturally affiliated for the purpose of identifying any known or potential Tribal Cultural Resources (TCR). Furthermore, the proposed Project includes a General Plan Amendment and must also comply with California Public Resources Code § 65352.3 – 65352.4 (Senate Bill [SB] 18), which requires local governments to conduct meaningful consultation with California Native American Tribes on the contact list maintained by the Native American Heritage Commission (NAHC) prior to the adoption or amendment of a City or County general plan for the purpose of protecting cultural places on lands affected by the proposed Project. As such, this letter serves as notification to your Tribe of the proposed Project and an invitation to consult on the Project pursuant to Assembly Bill 52 and Senate Bill 18.

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Once again, the City deeply values your input on the Project and its potential impacts to Tribal Cultural Resources (TCRs) or cultural places on the landscape. If you require any additional information to support your review of the Project or have any questions, please contact me at (310) 285-1136 or via e-mail at mhahm@beverlyhills.org.

Sincerely,

Minjee Hahm, AICP
Associate Planner
City of Beverly Hills

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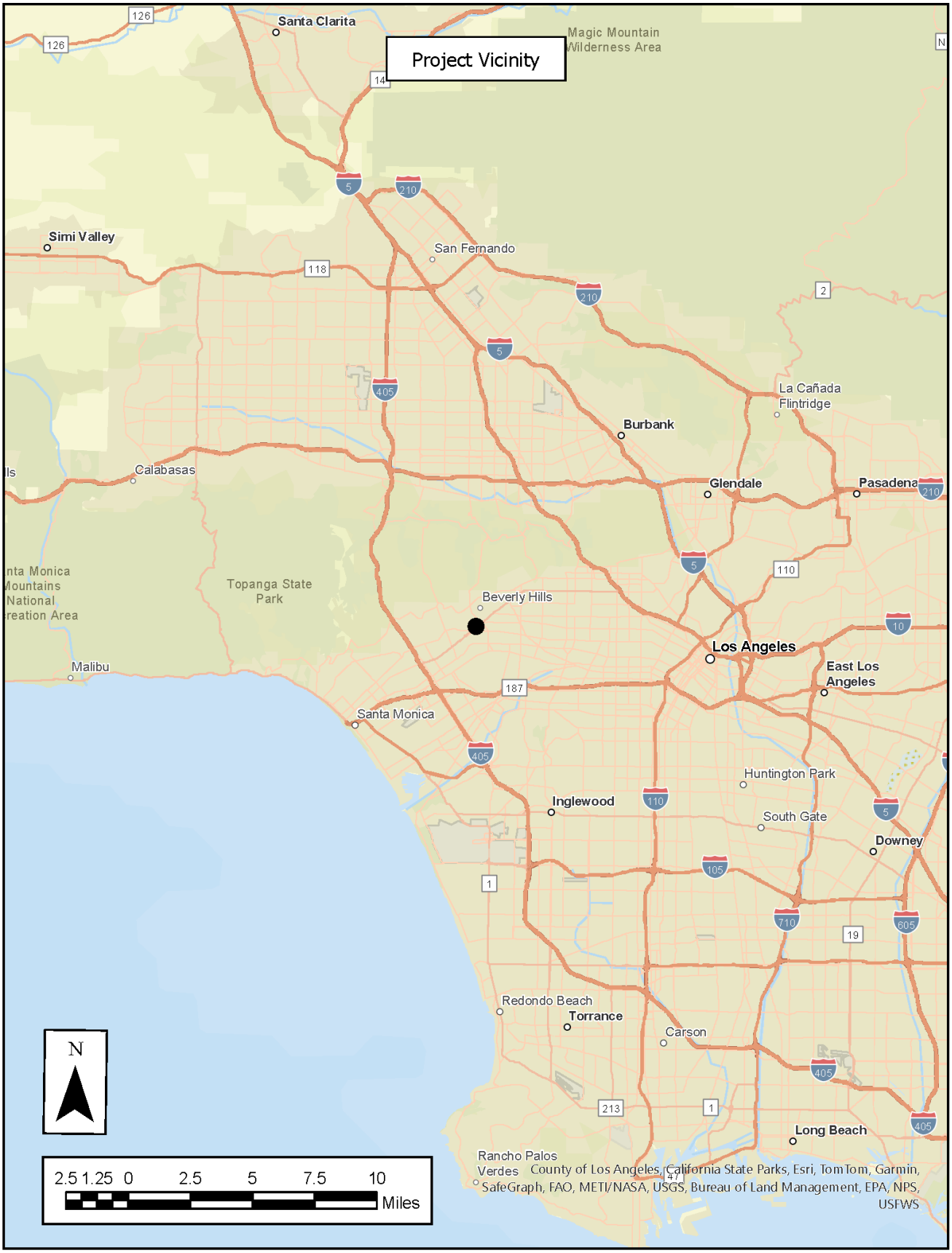
Project Vicinity Map
Local Project Area Map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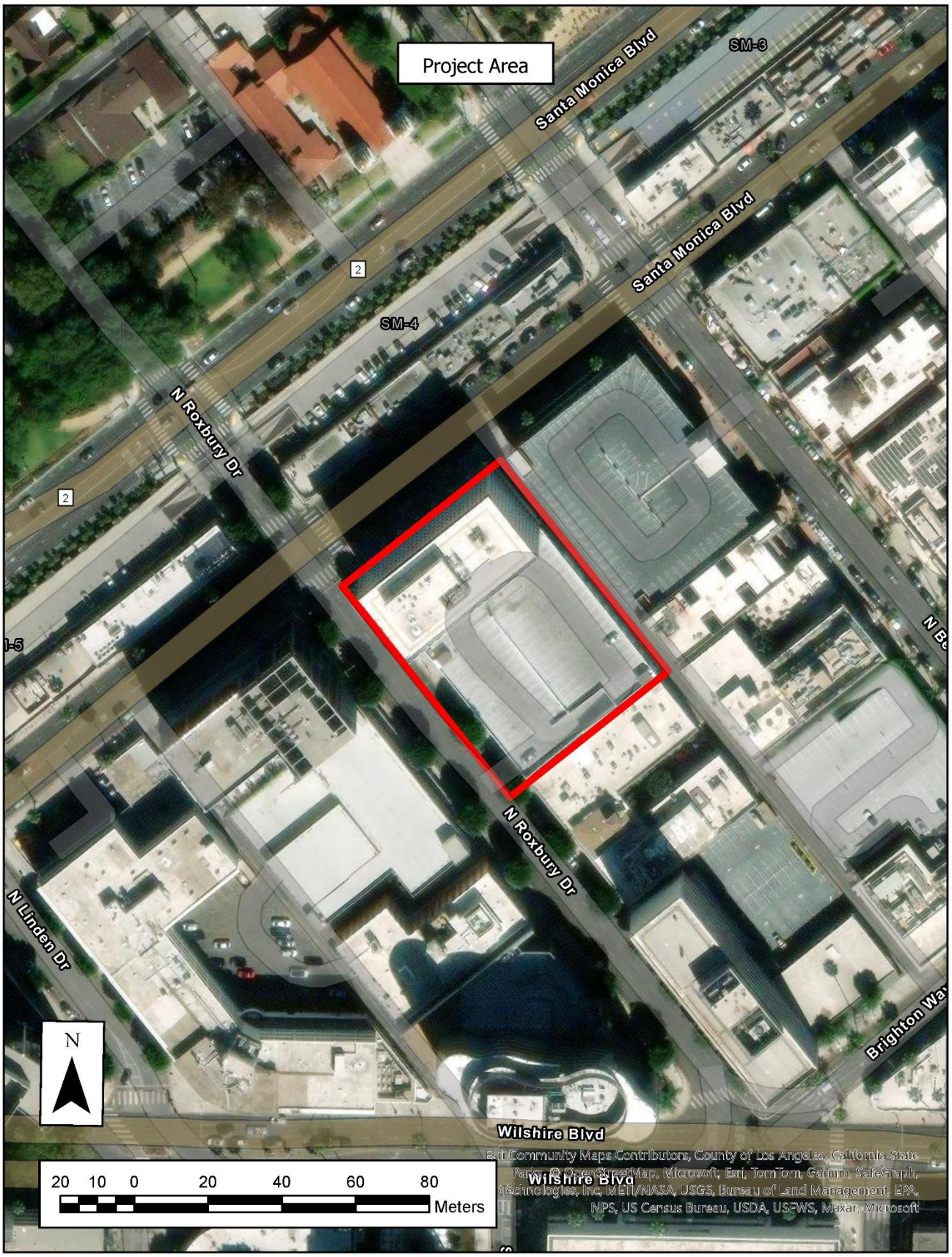
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July 9, 2024

Cahuilla Band of Indians
Anthony Madrigal, Tribal Historic Preservation Officer
52701 CA Highway 371
Anza, CA 92539
Via Email: anthonymad2022@gmail.com

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Officer Anthony Madrigal:

The City of Beverly Hills (City) is preparing an Initial Study/Negative Declaration (IS/ND) for the proposed 450 North Roxbury Drive Project (Project). The Project is located at 450 North Roxbury Road in the City of Beverly Hills within Township 1 South and Range 15 West of the United States Geological Survey (USGS) Beverly Hills 7.5 minute quadrangle. The Project area is currently developed and contains a high-rise office building and attached parking garage. The Project area is surrounded by a mix of commercial and residential development and is bounded by Santa Monica Blvd./SR-2 to the northwest, Bram Goldsmith Way to the northeast, North Roxbury Drive to the southwest, and a medical office to the southeast. The Project proposes to rehabilitate a portion of the first floor of the existing garage into four retail spaces totaling approximately 6,797 square feet. The Project would retain the parking spaces on the two below ground levels, the northern portion of the ground floor, the entirety of the second above-ground level, and entirety of the roof, as well as retain the vehicle entries and exits on the east and west ends of the garage. The Project Site is fully built out, and no further ground disturbance at the Project Site is contemplated by the Project.

The proposed Project must comply with California Public Resources Code § 21080.3.1 (Assembly Bill [AB] 52 of 2014), which requires local governments to conduct meaningful consultation with California Native American Tribes that have requested to be notified by lead agencies of proposed Projects in the geographic area with which the Tribe is traditionally and culturally affiliated for the purpose of identifying any known or potential Tribal Cultural Resources (TCR). Furthermore, the proposed Project includes a General Plan Amendment and must also comply with California Public Resources Code § 65352.3 – 65352.4 (Senate Bill [SB] 18), which requires local governments to conduct meaningful consultation with California Native American Tribes on the contact list maintained by the Native American Heritage Commission (NAHC) prior to the adoption or amendment of a City or County general plan for the purpose of protecting cultural places on lands affected by the proposed Project. As such, this letter serves as notification to your Tribe of the proposed Project and an invitation to consult on the Project pursuant to Assembly Bill 52 and Senate Bill 18.

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Sincerely,

Minjee Hahm, AICP
Associate Planner
City of Beverly Hills

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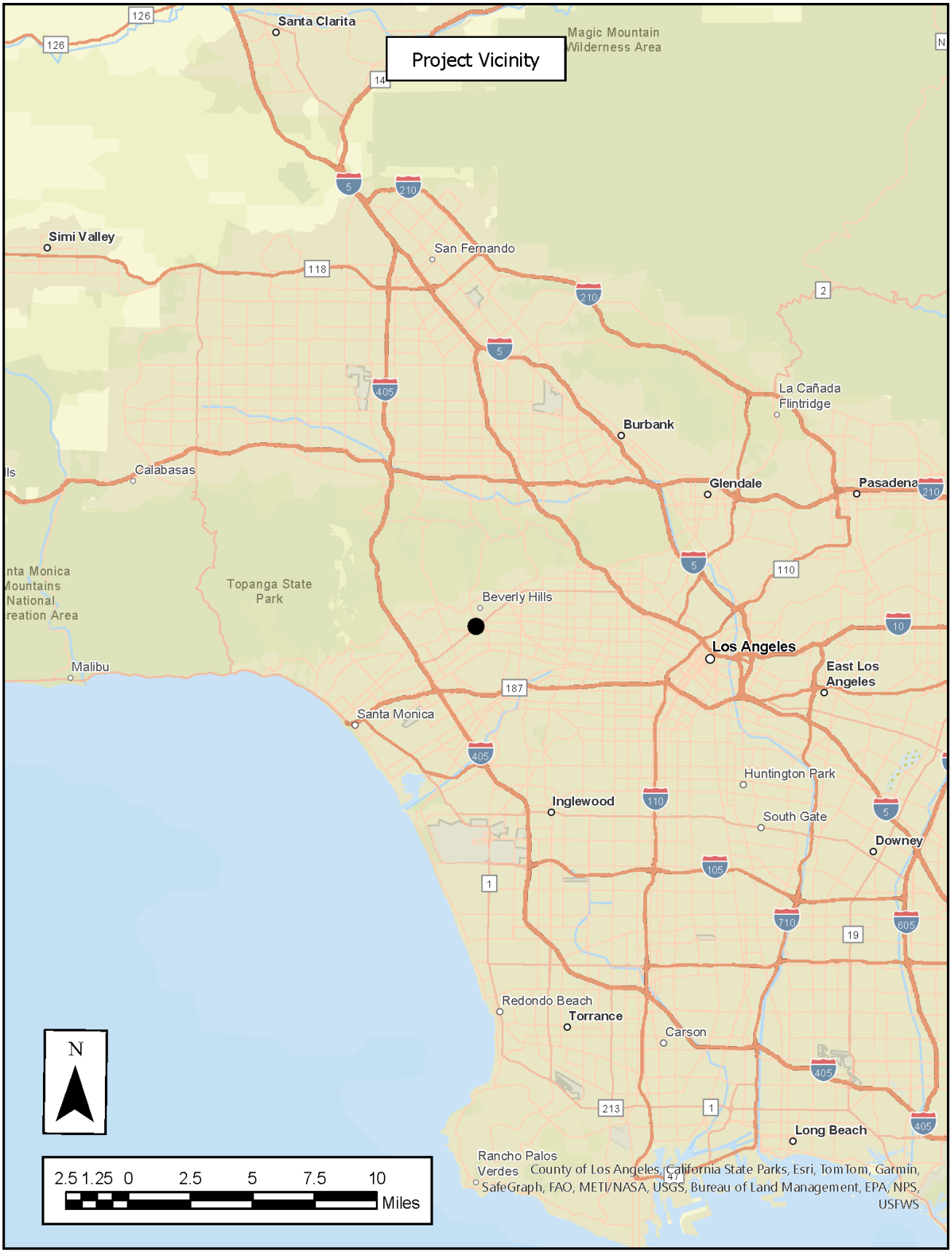
Local Project Area Map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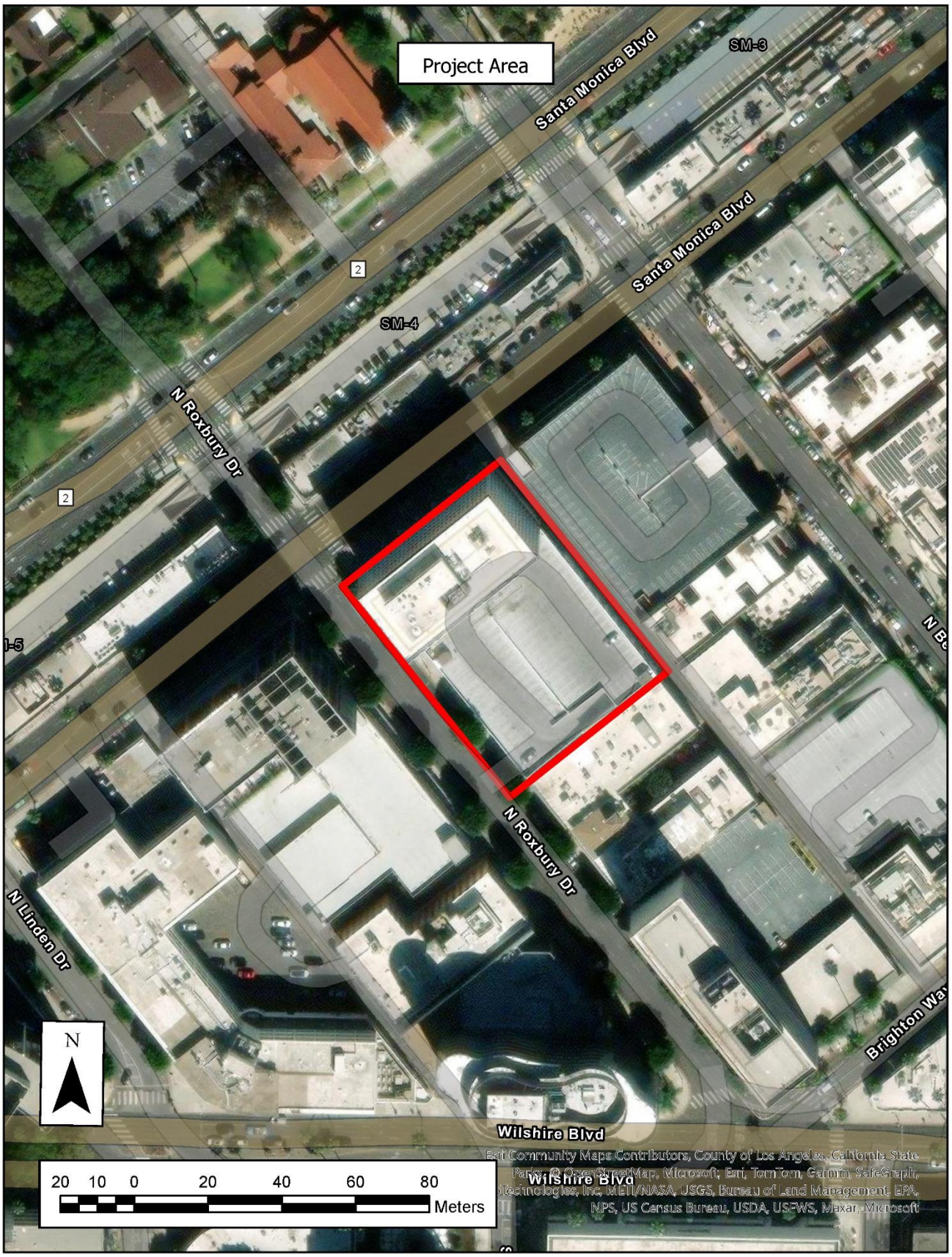
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July 9, 2024

Cahuilla Band of Indians
Erica Schenk, Chairperson
52701 CA Highway 371
Anza, CA 92539
Via Email: chair@cahuilla-nsn.gov

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Chairperson Erica Schenk:

The City of Beverly Hills (City) is preparing an Initial Study/Negative Declaration (IS/ND) for the proposed 450 North Roxbury Drive Project (Project). The Project is located at 450 North Roxbury Road in the City of Beverly Hills within Township 1 South and Range 15 West of the United States Geological Survey (USGS) Beverly Hills 7.5 minute quadrangle. The Project area is currently developed and contains a high-rise office building and attached parking garage. The Project area is surrounded by a mix of commercial and residential development and is bounded by Santa Monica Blvd./SR-2 to the northwest, Bram Goldsmith Way to the northeast, North Roxbury Drive to the southwest, and a medical office to the southeast. The Project proposes to rehabilitate a portion of the first floor of the existing garage into four retail spaces totaling approximately 6,797 square feet. The Project would retain the parking spaces on the two below ground levels, the northern portion of the ground floor, the entirety of the second above-ground level, and entirety of the roof, as well as retain the vehicle entries and exits on the east and west ends of the garage. The Project Site is fully built out, and no further ground disturbance at the Project Site is contemplated by the Project.

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Sincerely,

Minjee Hahm, AICP
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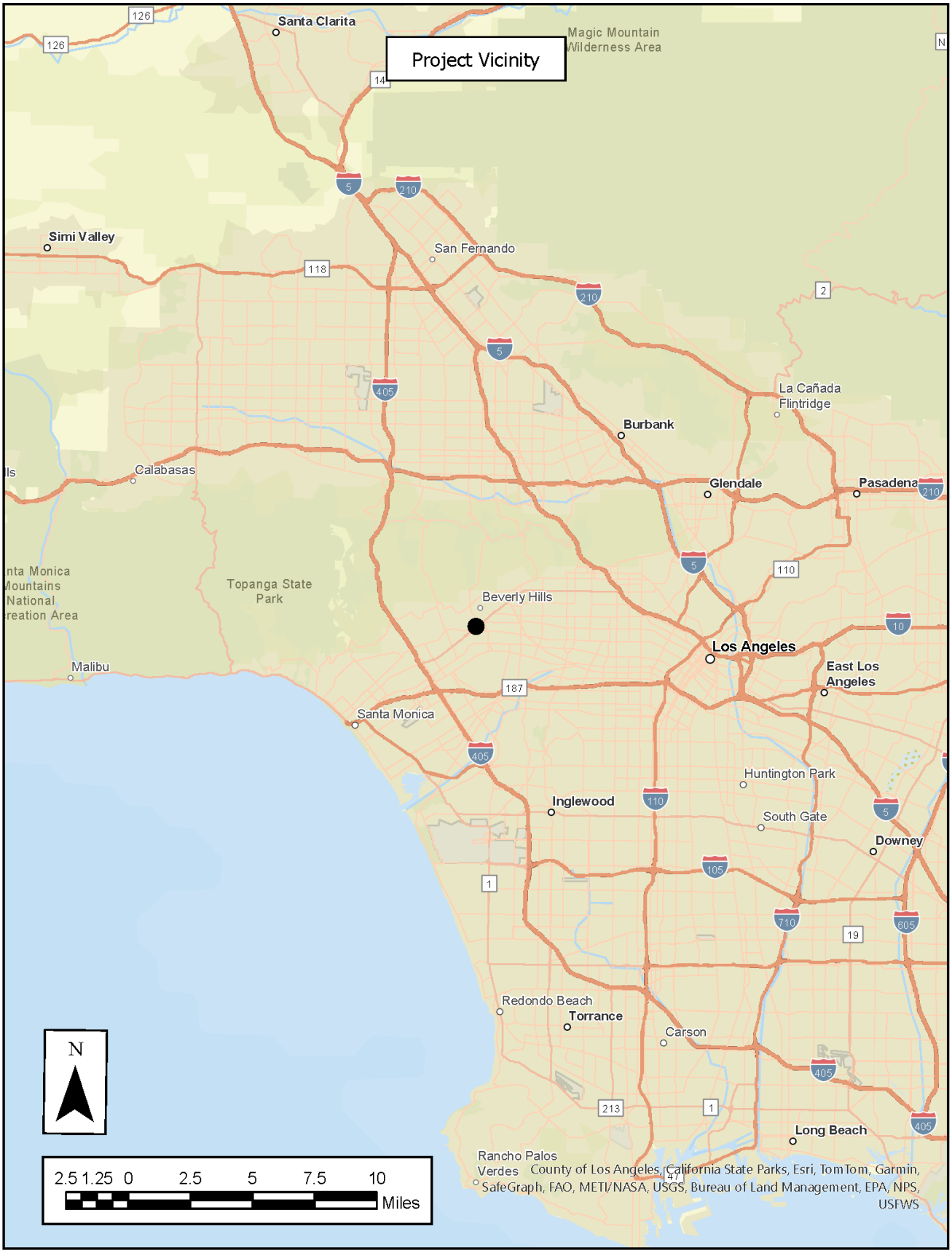
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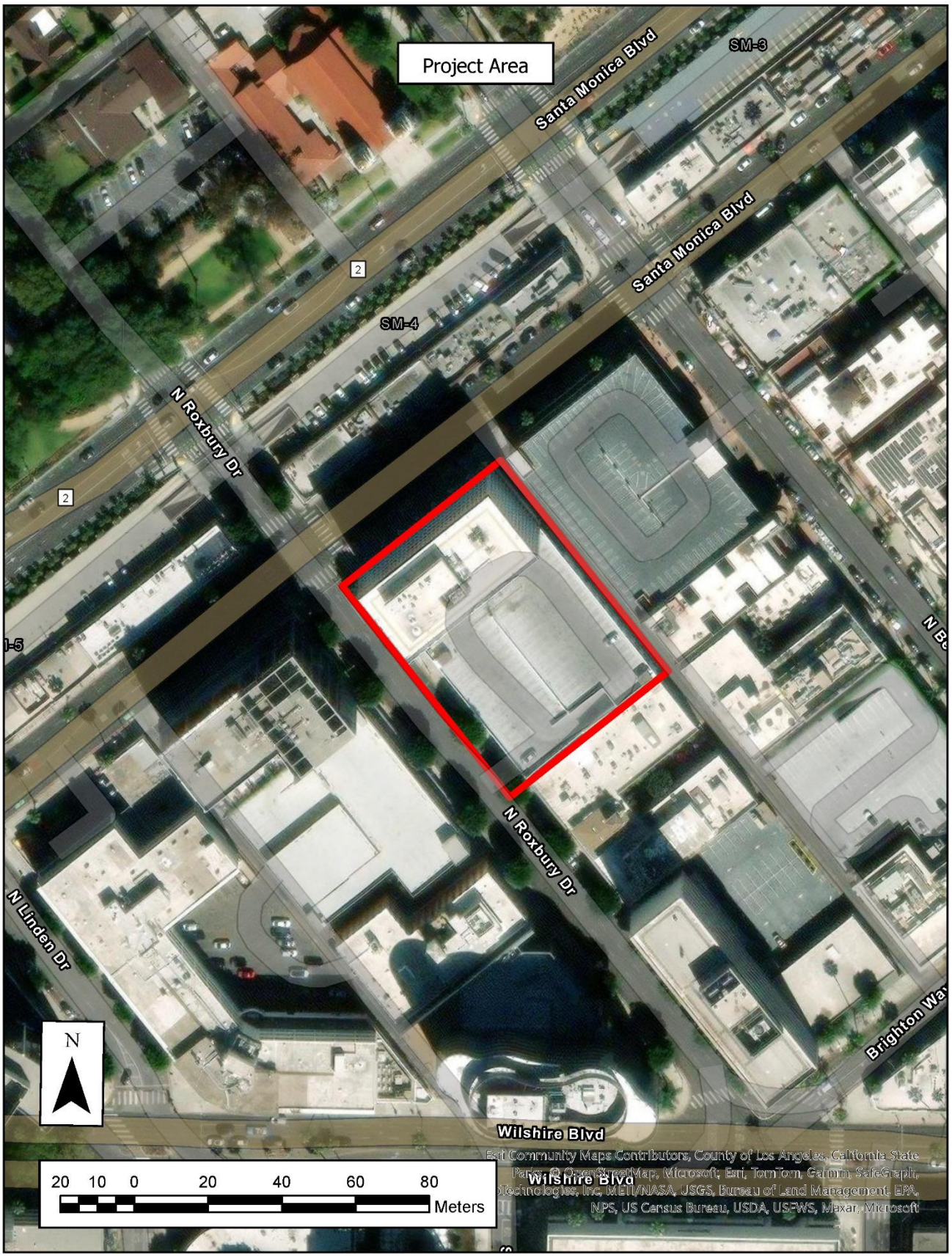
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July 9, 2024

Gabrieleno Band of Mission Indians – Kizh Nation
Christina Swindall Martinez, Secretary
P.O. Box 393
Covina, CA 91723
Via Email: admin@gabrielenoindians.org

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Secretary Christina Swindall Martinez:

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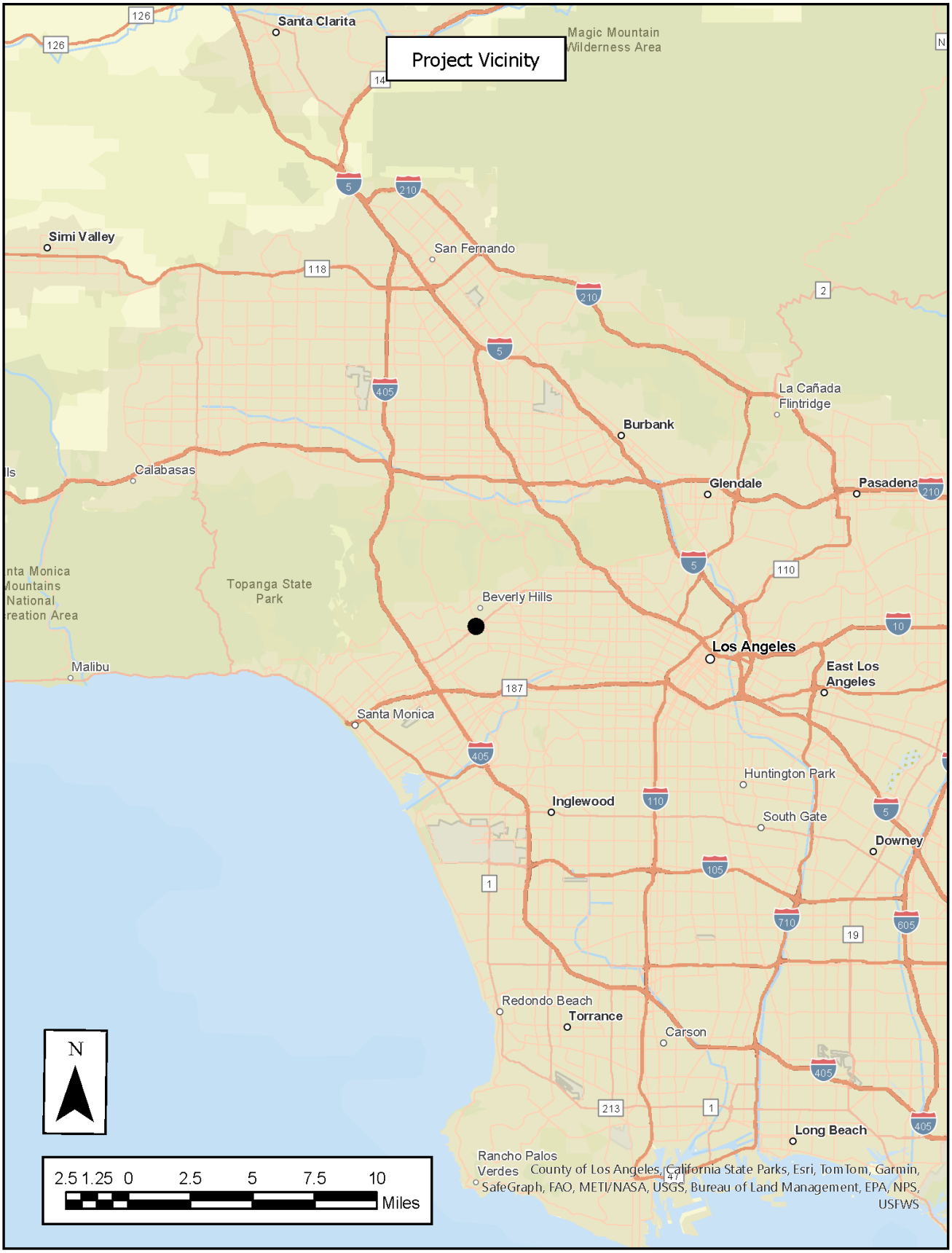
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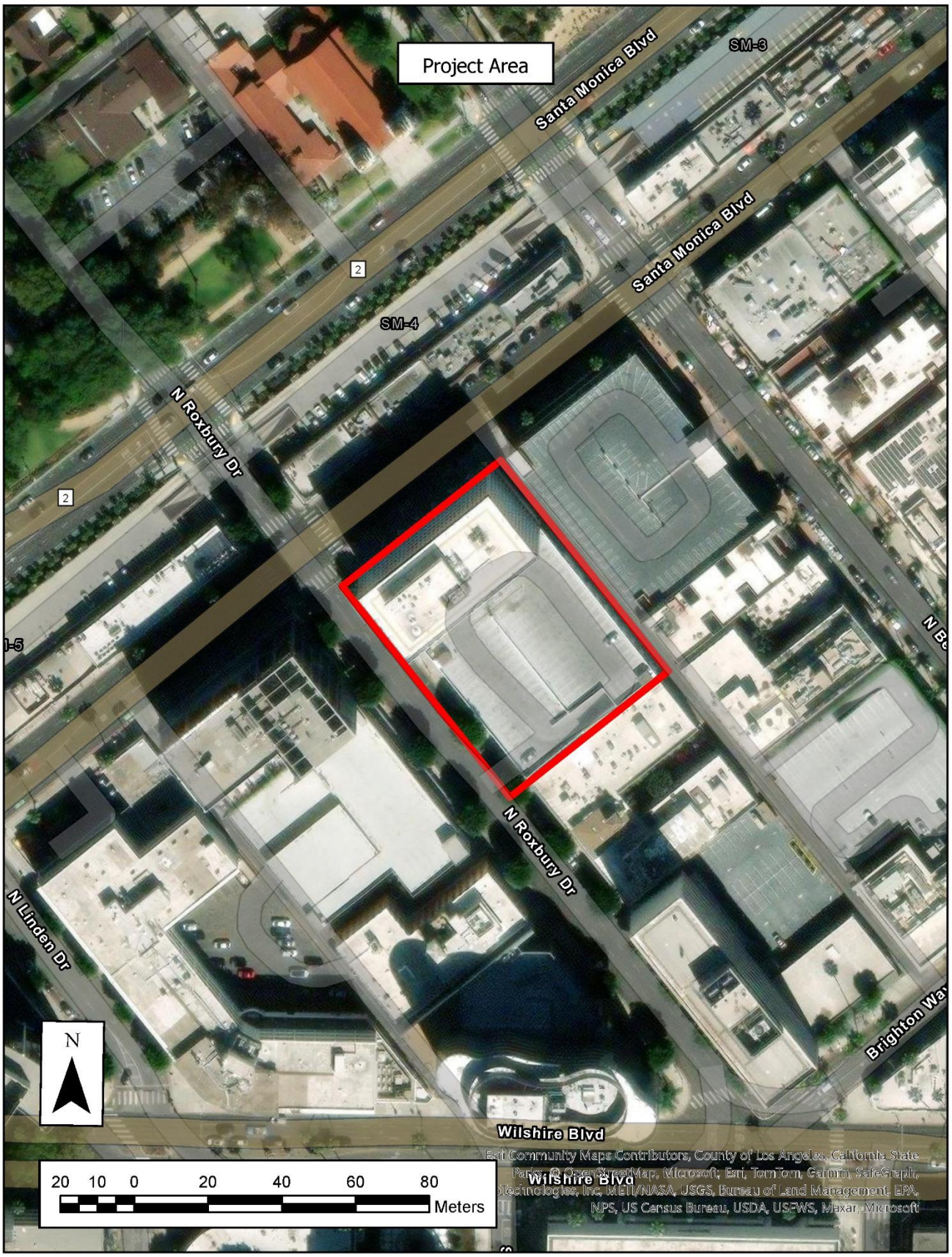
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July 9, 2024

Gabrieleno Band of Mission Indians – Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA 91723
Via Email: admin@gabrielenoindians.org

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Chairperson Andrew Salas:

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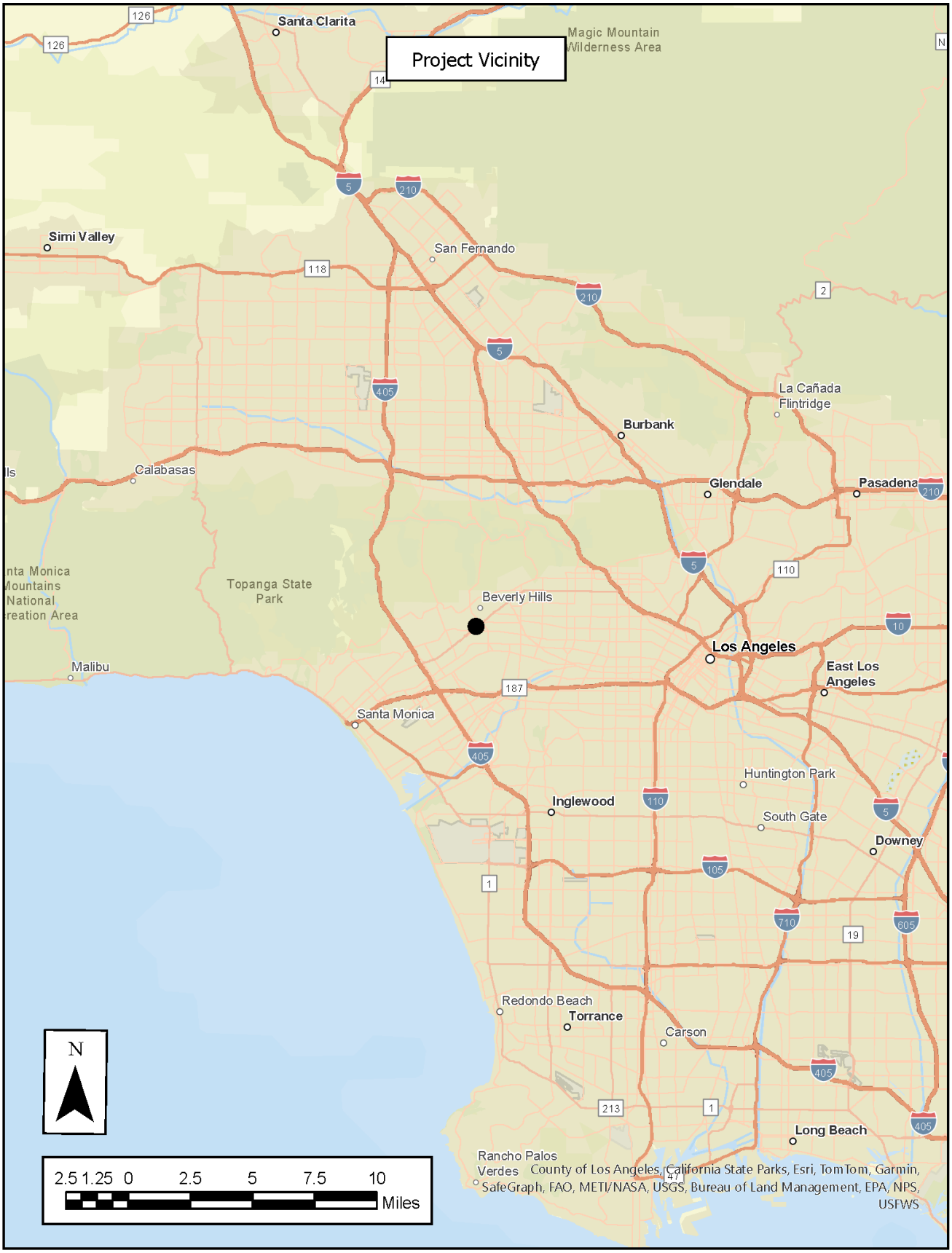
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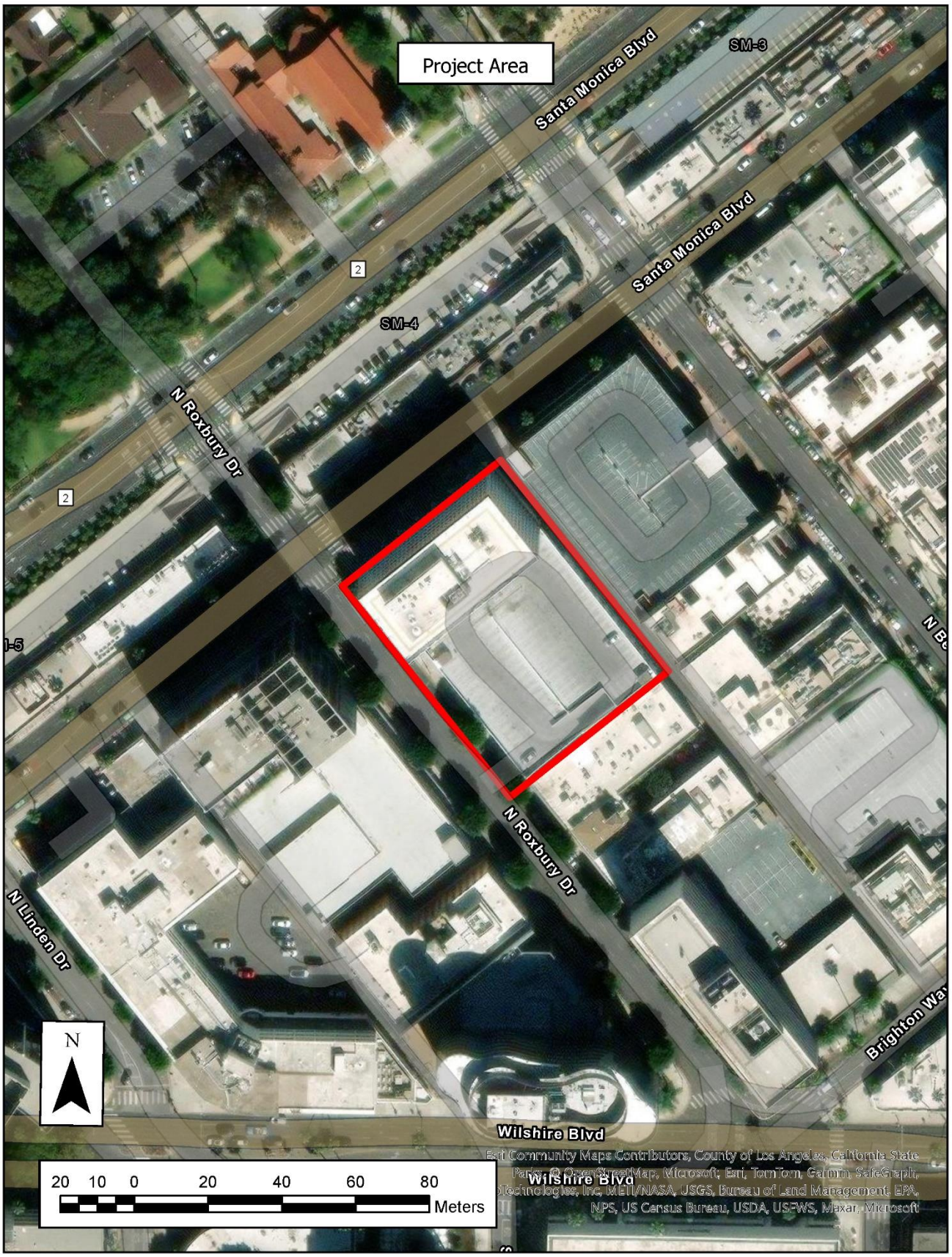
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July 9, 2024

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA 91778
Via Email: GTTribalcouncil@aol.com

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Chairperson Anthony Morales:

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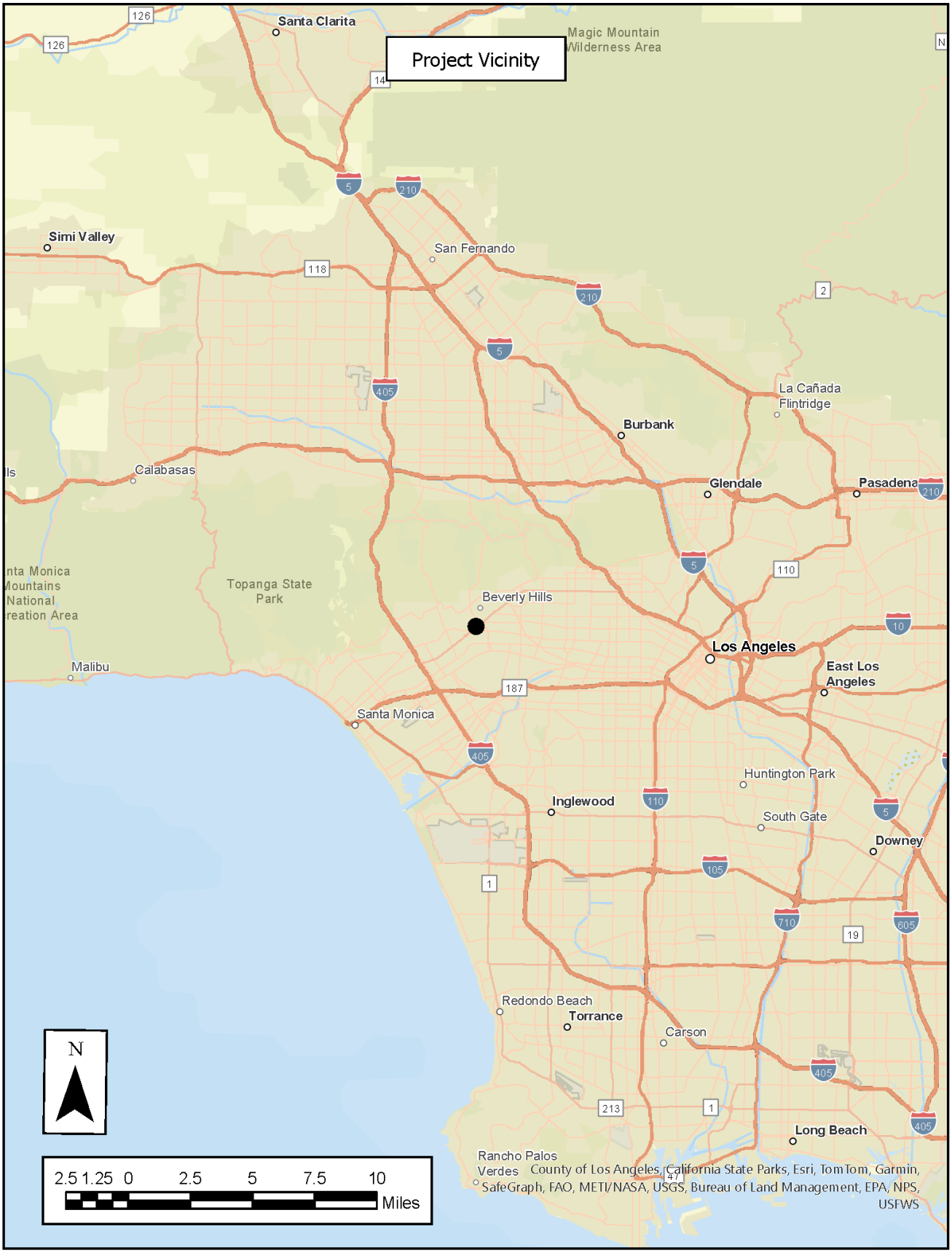
Sincerely,

Minjee Hahm, AICP
Associate Planner
City of Beverly Hills

Enclosed:
Project Vicinity Map
Local Project Area Map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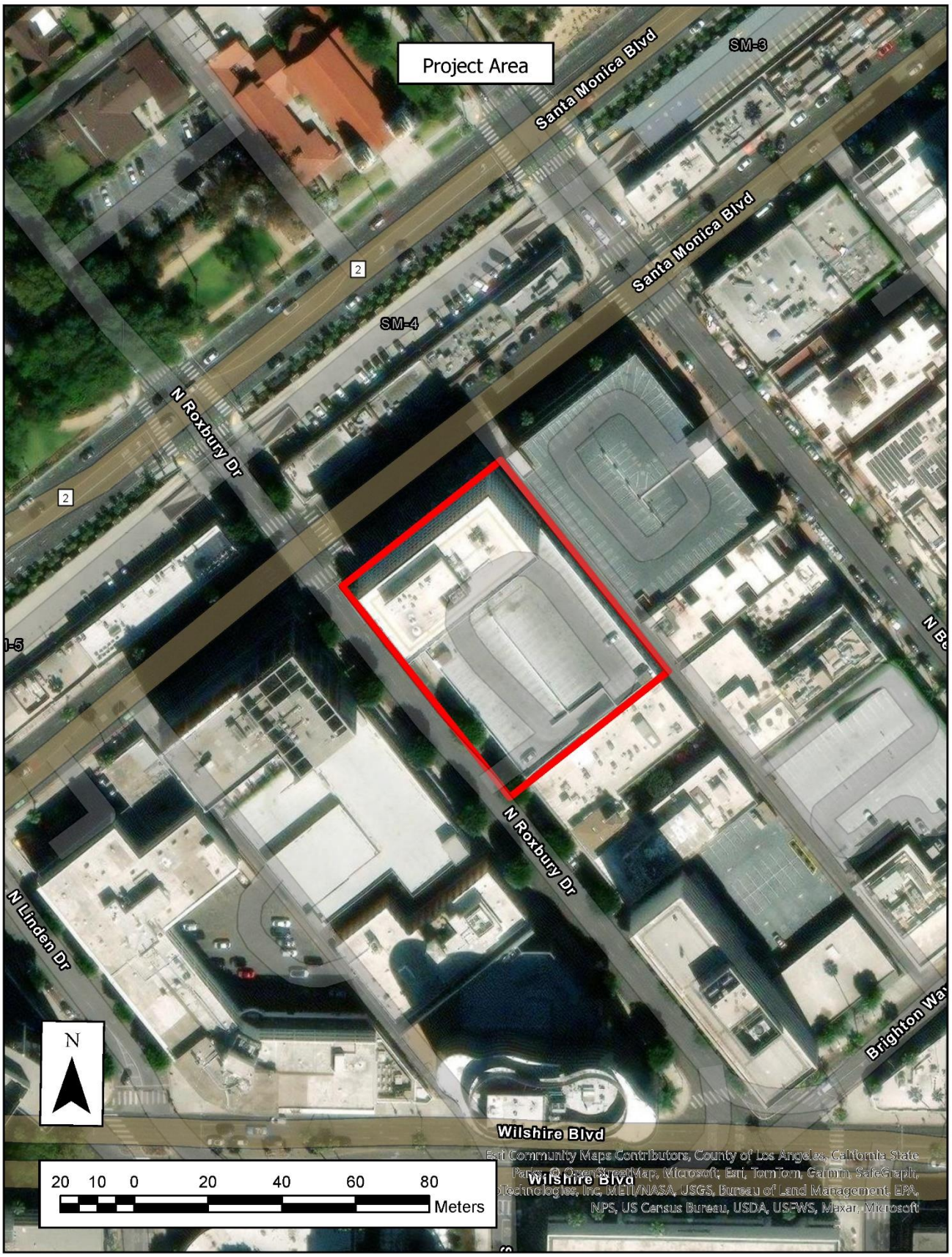
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July 9, 2024

Gabrielino Tongva Indians of California Tribal Council
Christina Conley, Cultural Resource Administrator
P.O. Box 941078
Simi Valley, CA 93094
Via Email: christina.marsden@alumni.usc.edu

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Administrator Christina Conley:

The City of Beverly Hills (City) is preparing an Initial Study/Negative Declaration (IS/ND) for the proposed 450 North Roxbury Drive Project (Project). The Project is located at 450 North Roxbury Road in the City of Beverly Hills within Township 1 South and Range 15 West of the United States Geological Survey (USGS) Beverly Hills 7.5 minute quadrangle. The Project area is currently developed and contains a high-rise office building and attached parking garage. The Project area is surrounded by a mix of commercial and residential development and is bounded by Santa Monica Blvd./SR-2 to the northwest, Bram Goldsmith Way to the northeast, North Roxbury Drive to the southwest, and a medical office to the southeast. The Project proposes to rehabilitate a portion of the first floor of the existing garage into four retail spaces totaling approximately 6,797 square feet. The Project would retain the parking spaces on the two below ground levels, the northern portion of the ground floor, the entirety of the second above-ground level, and entirety of the roof, as well as retain the vehicle entries and exits on the east and west ends of the garage. The Project Site is fully built out, and no further ground disturbance at the Project Site is contemplated by the Project.

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City of Beverly Hills

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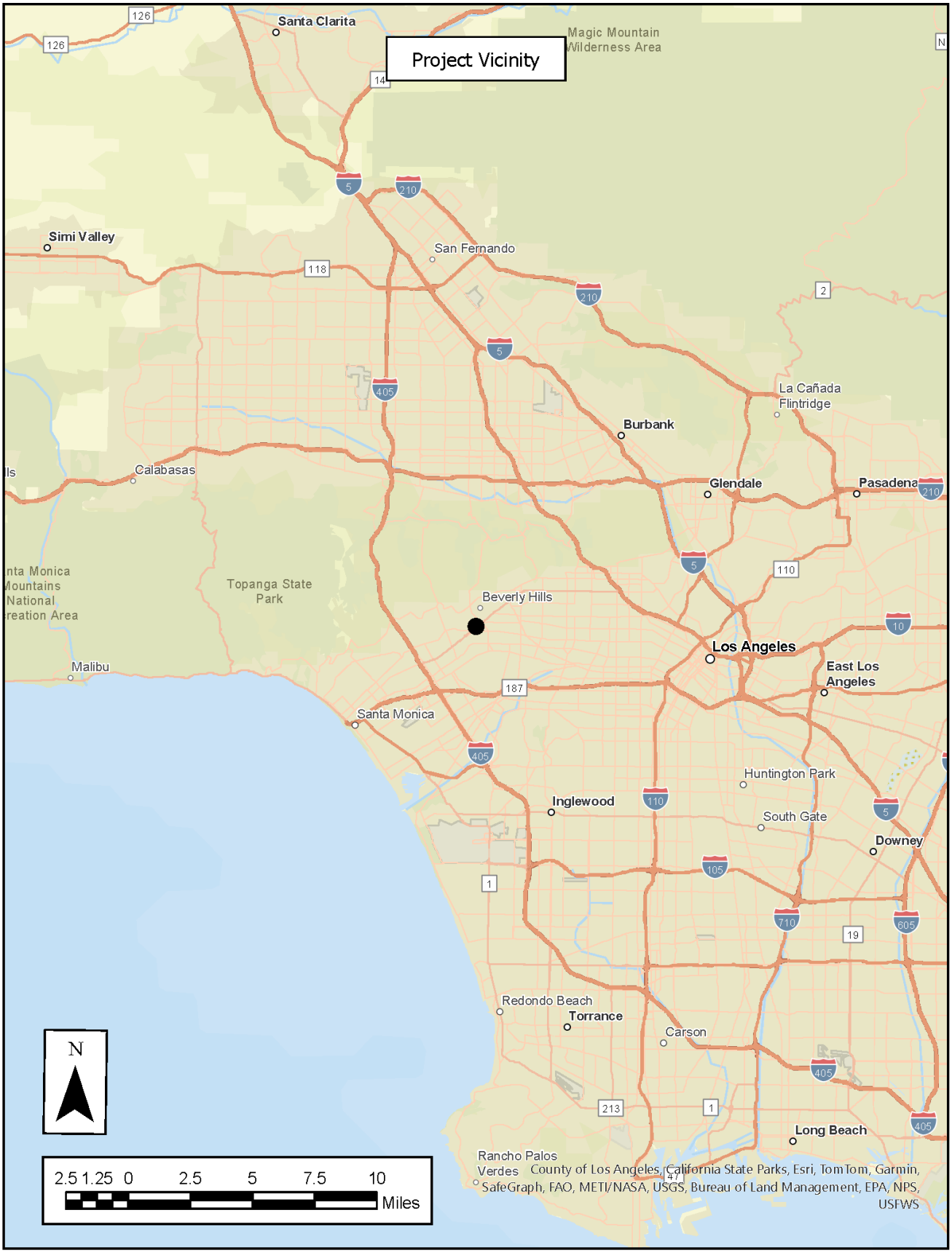
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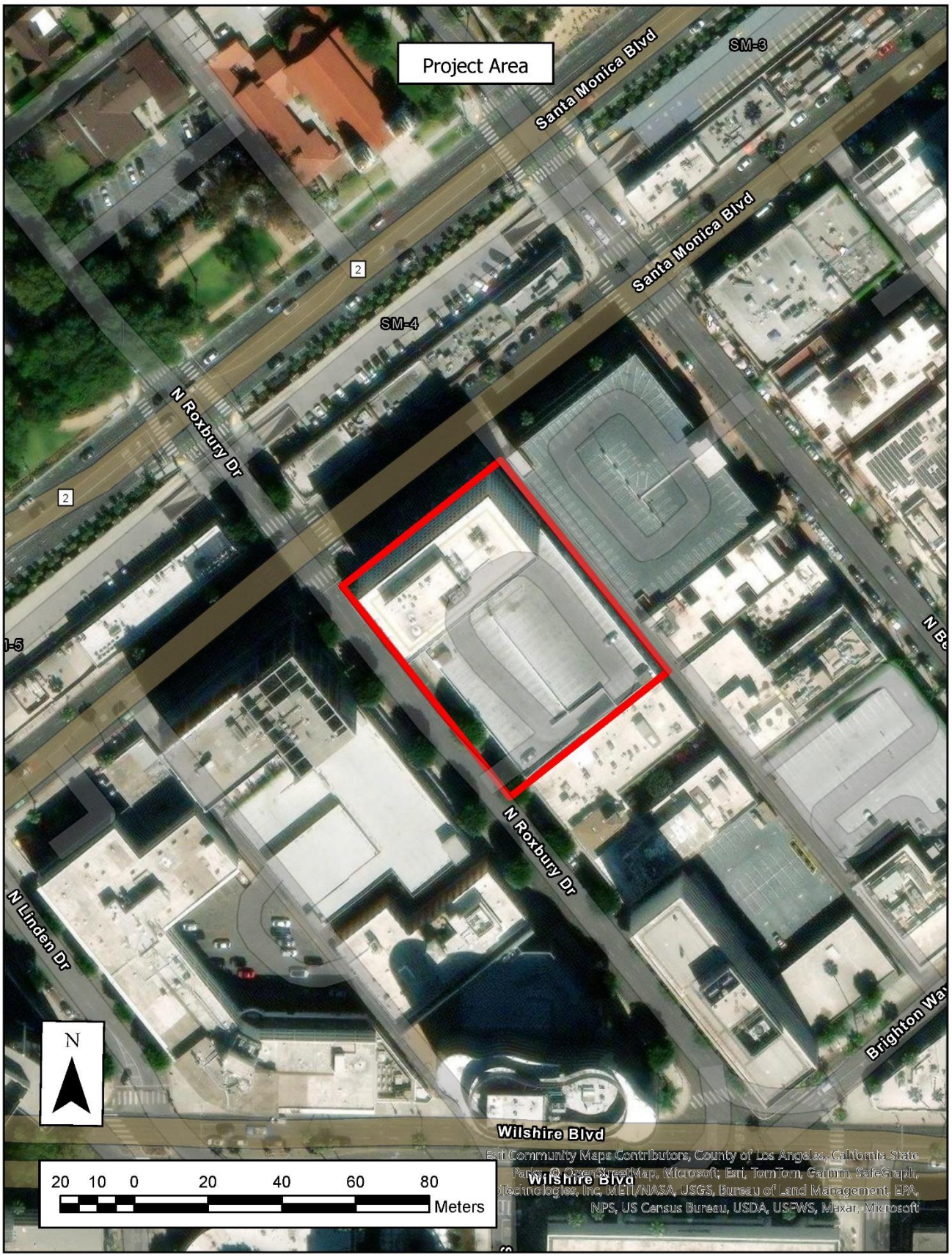
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July 9, 2024

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Chairperson
P.O. Box 490
Bellflower, CA 90707
Via Email: gtongva@gmail.com

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Chairperson Robert Dorame:

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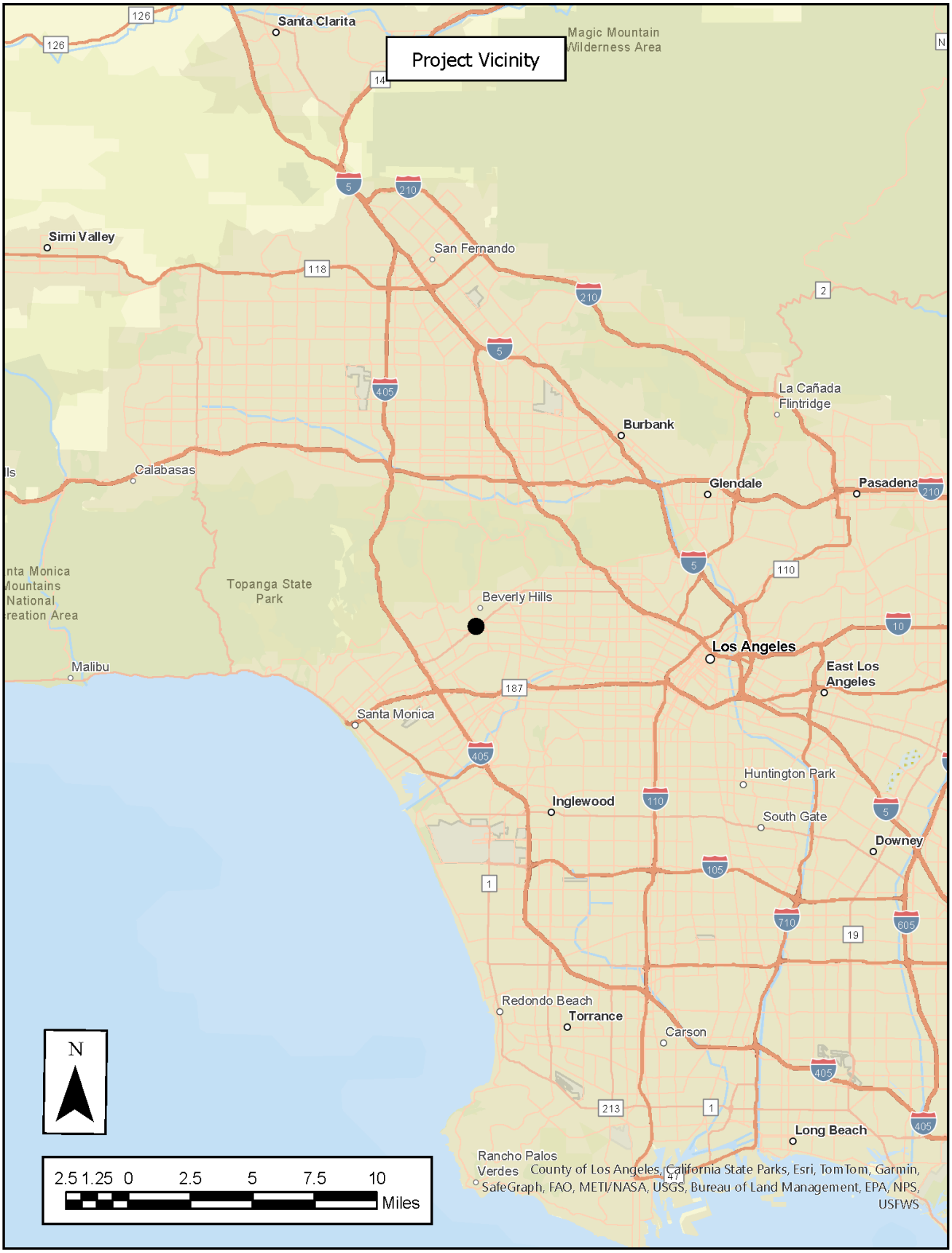
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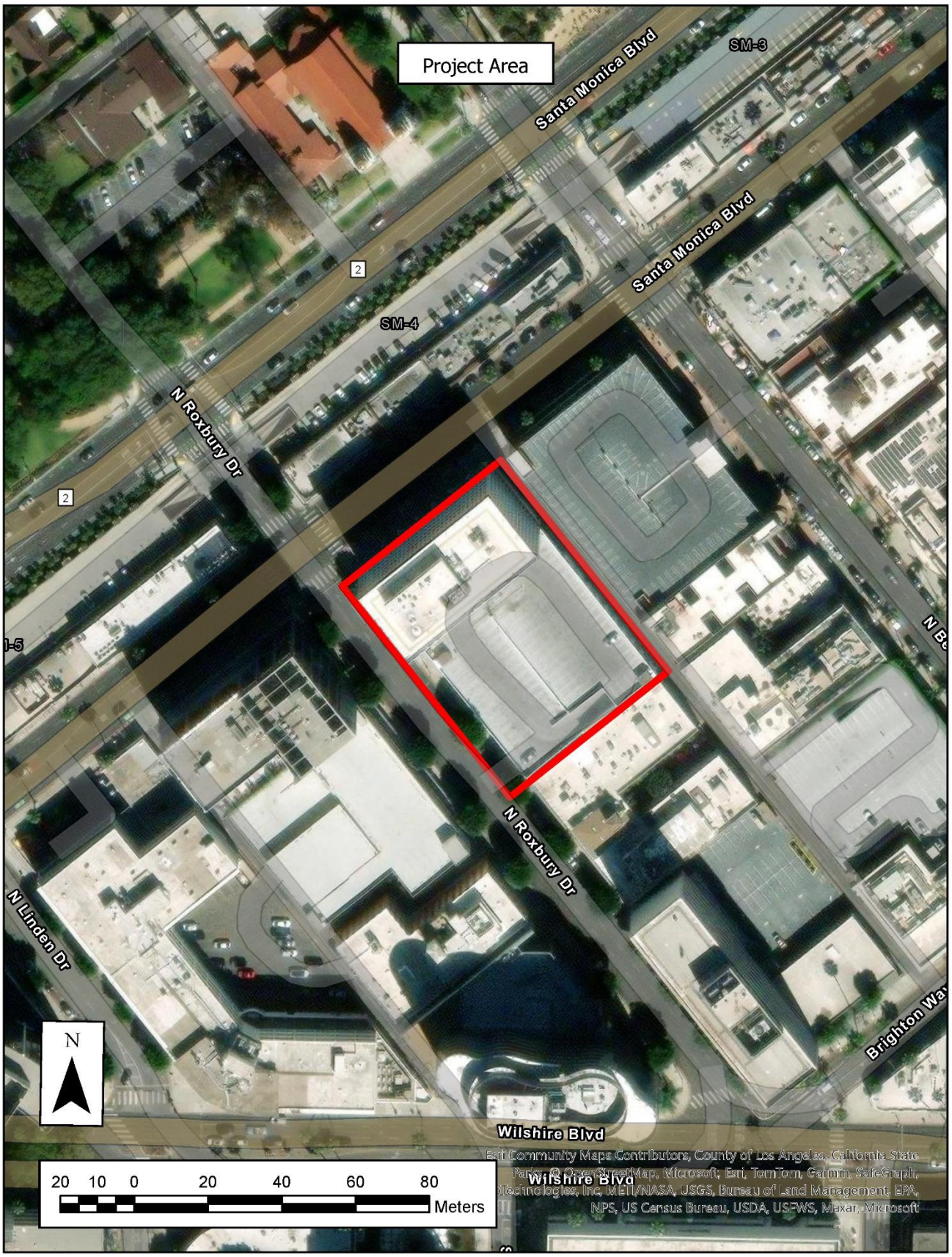
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July 9, 2024

Gabrielino/Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso Street, #231
Los Angeles, CA 90012
Via Email: sgoad@gabrielino-tongva.com

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Chairperson Sandonne Goad:

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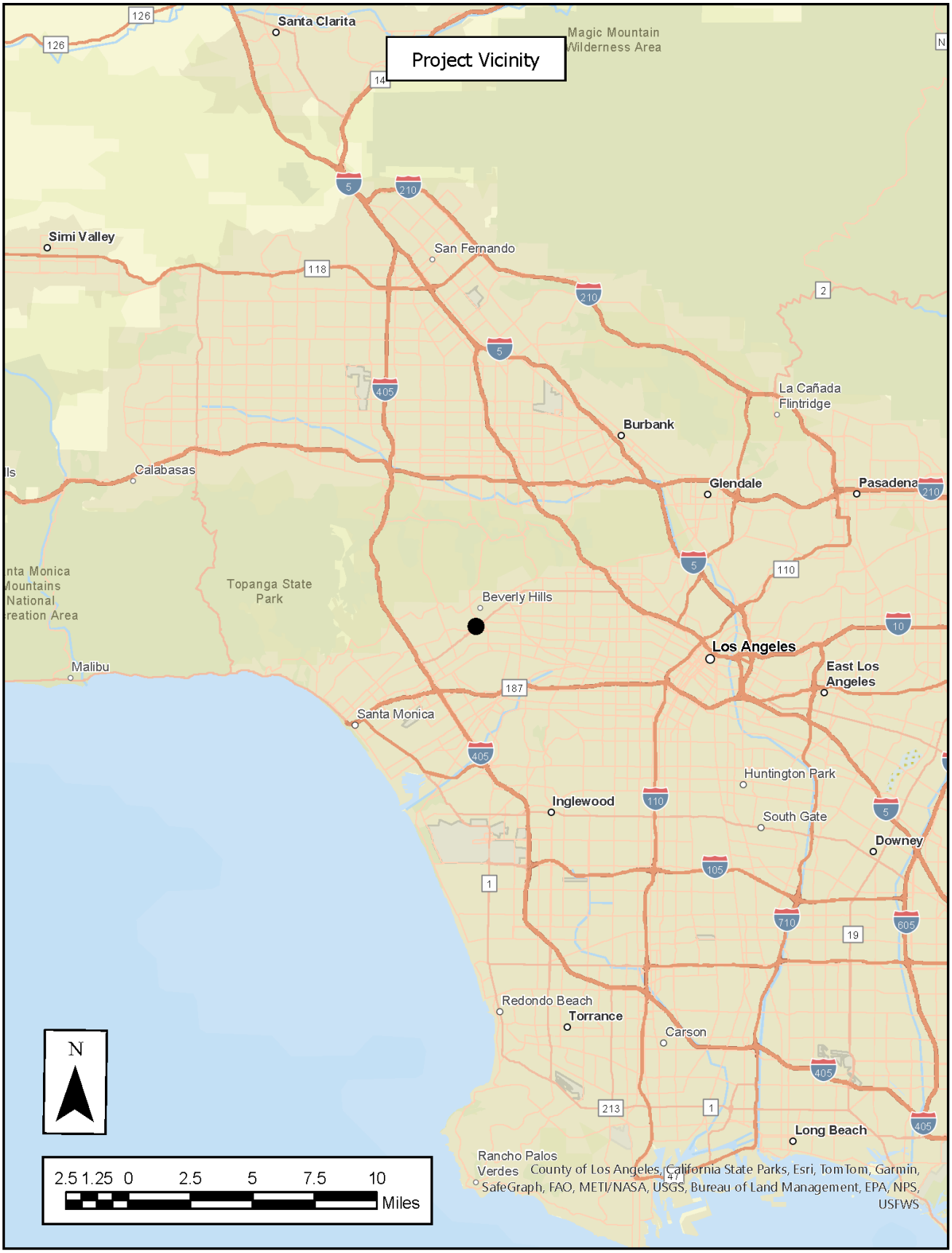
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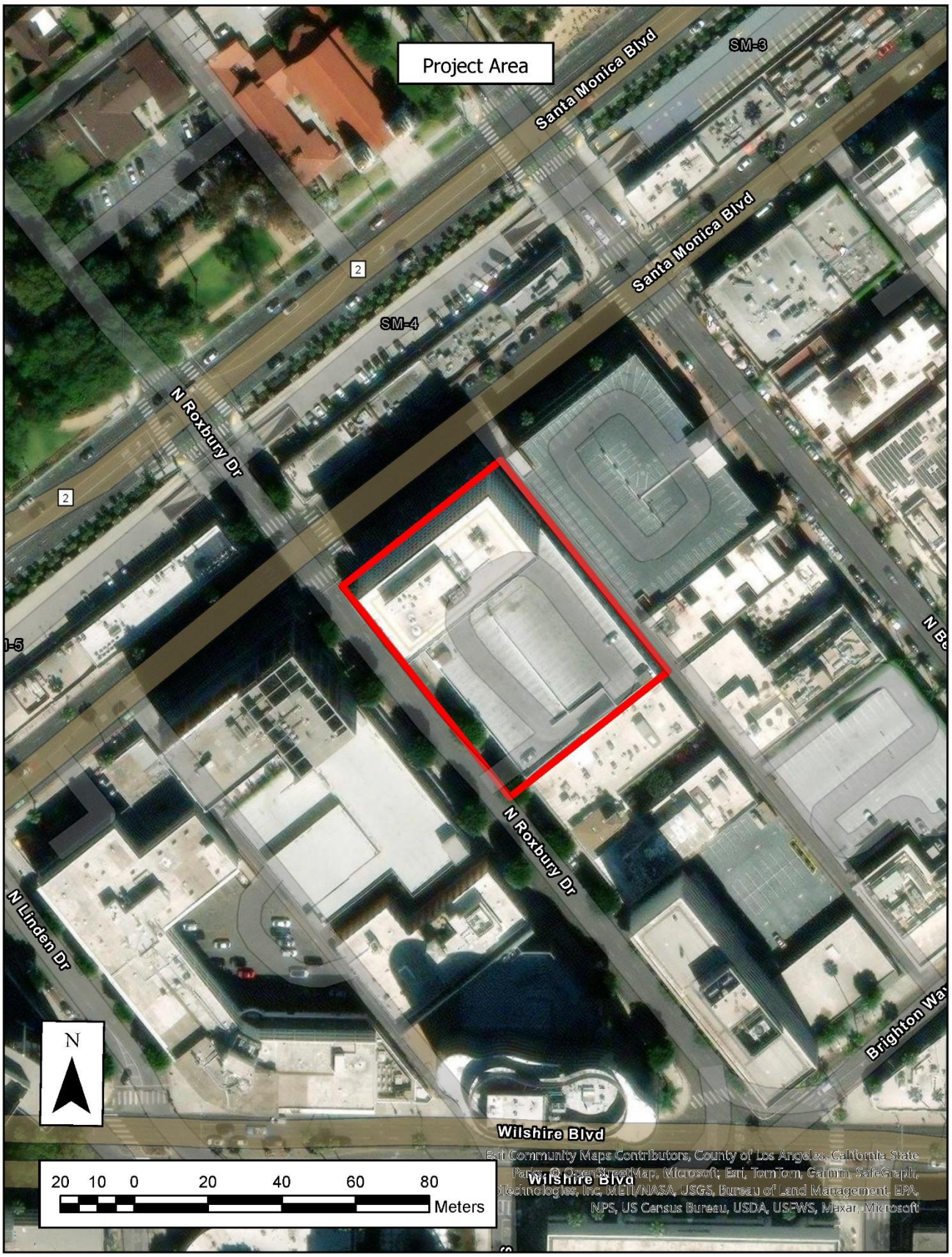
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July 9, 2024

Gabrielino-Tongva Tribe
Charles Alvarez, Chairperson
23454 Vanowen Street
West Hills, CA 91307
Via Email: Chavez1956metro@gmail.com

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Chairperson Charles Alvarez:

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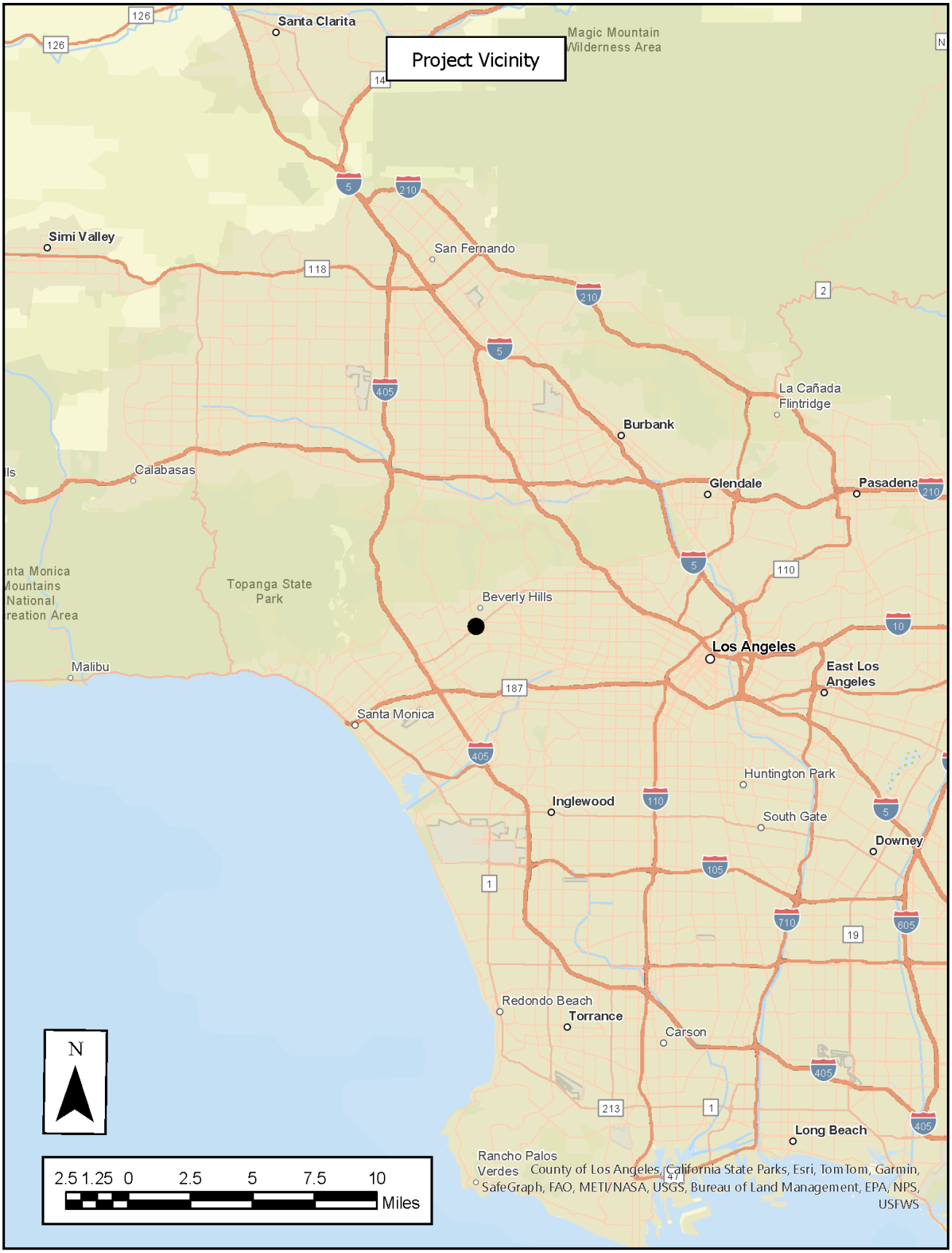
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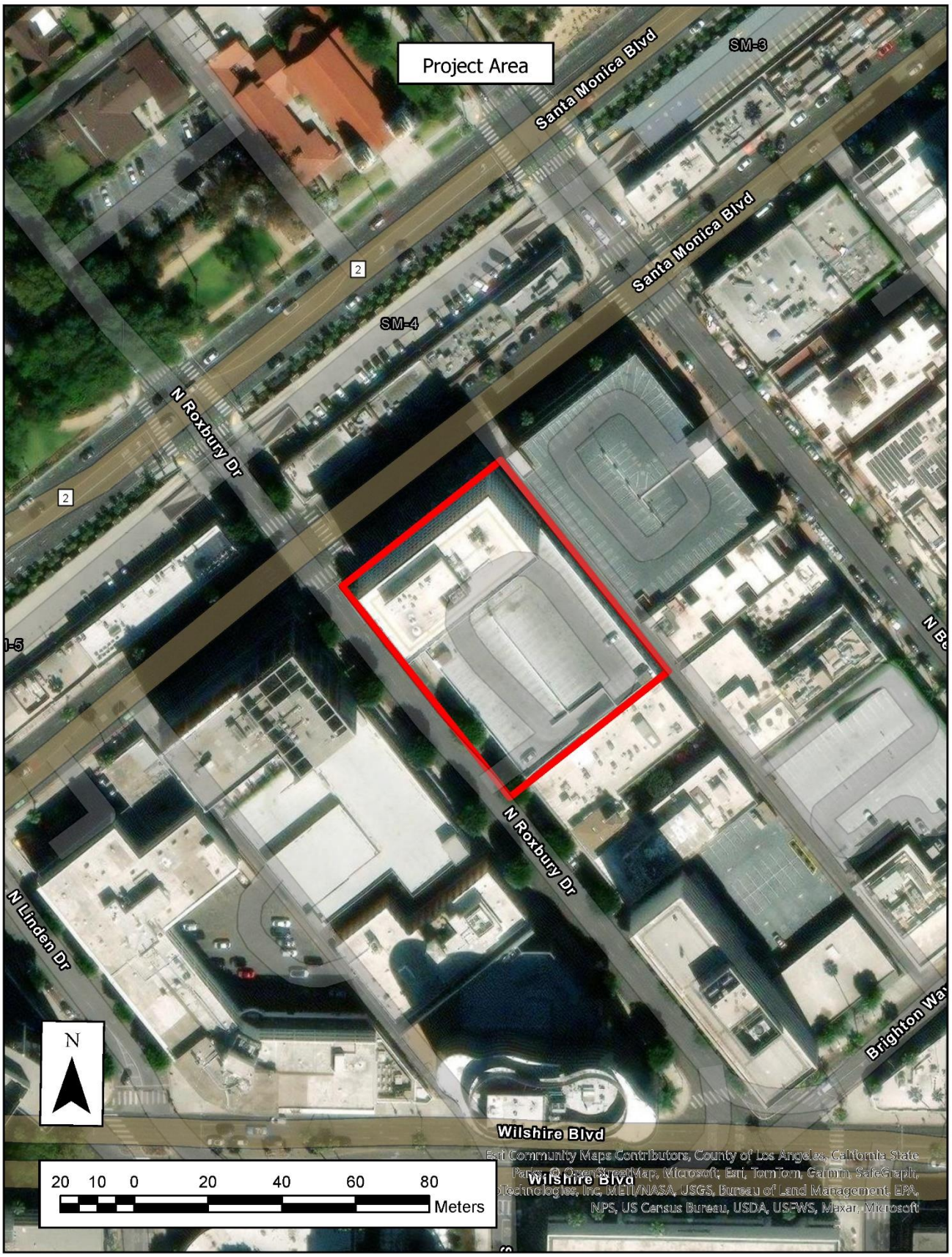
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July 9, 2024

Gabrielino-Tongva Tribe
Sam Dunlap, Cultural Resource Director
P.O. Box 3919
Seal Beach, CA 90740
Via Email: tongvatcr@gmail.com

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Director Sam Dunlap:

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Sincerely,

Minjee Hahm, AICP
Associate Planner
City of Beverly Hills

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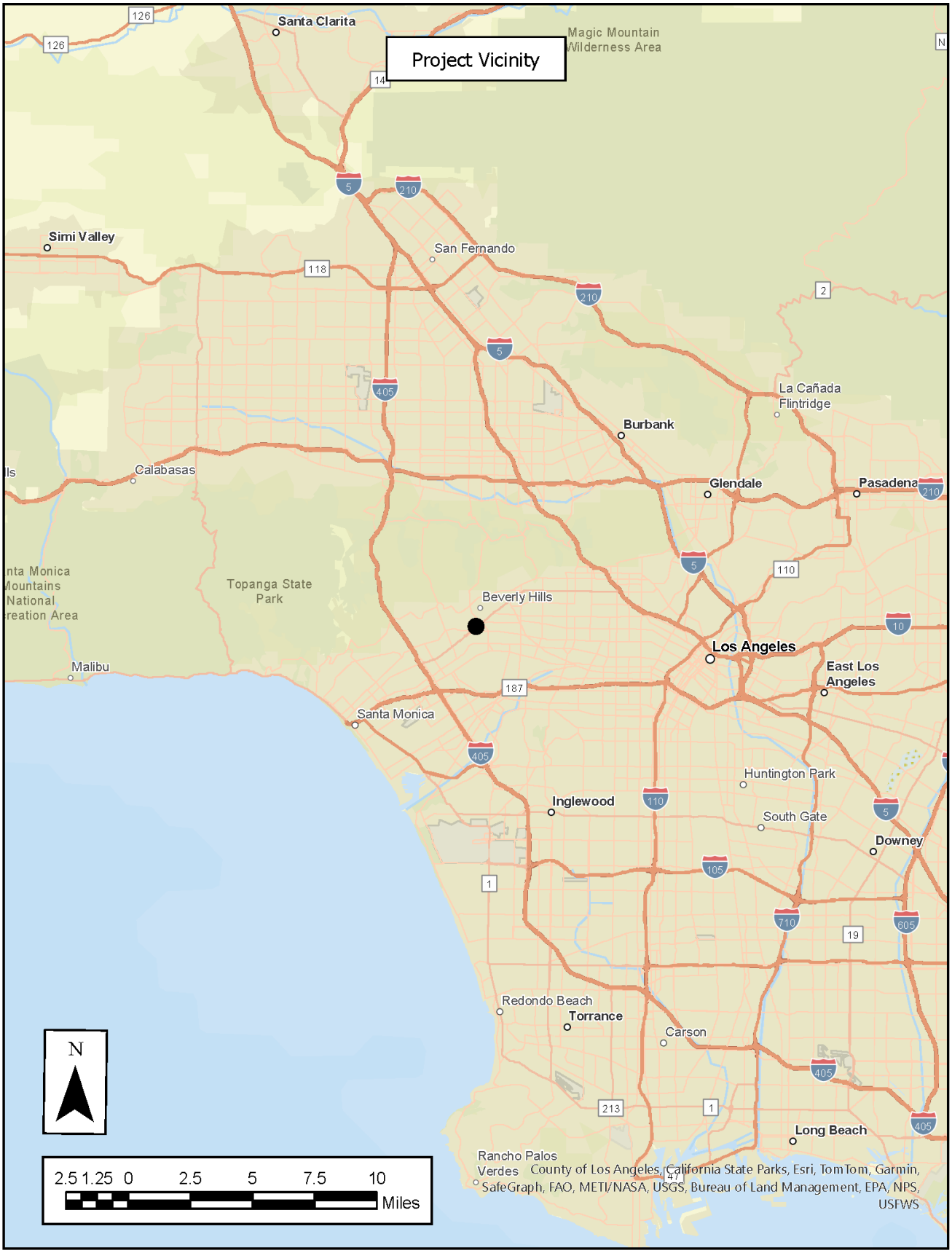
Local Project Area Map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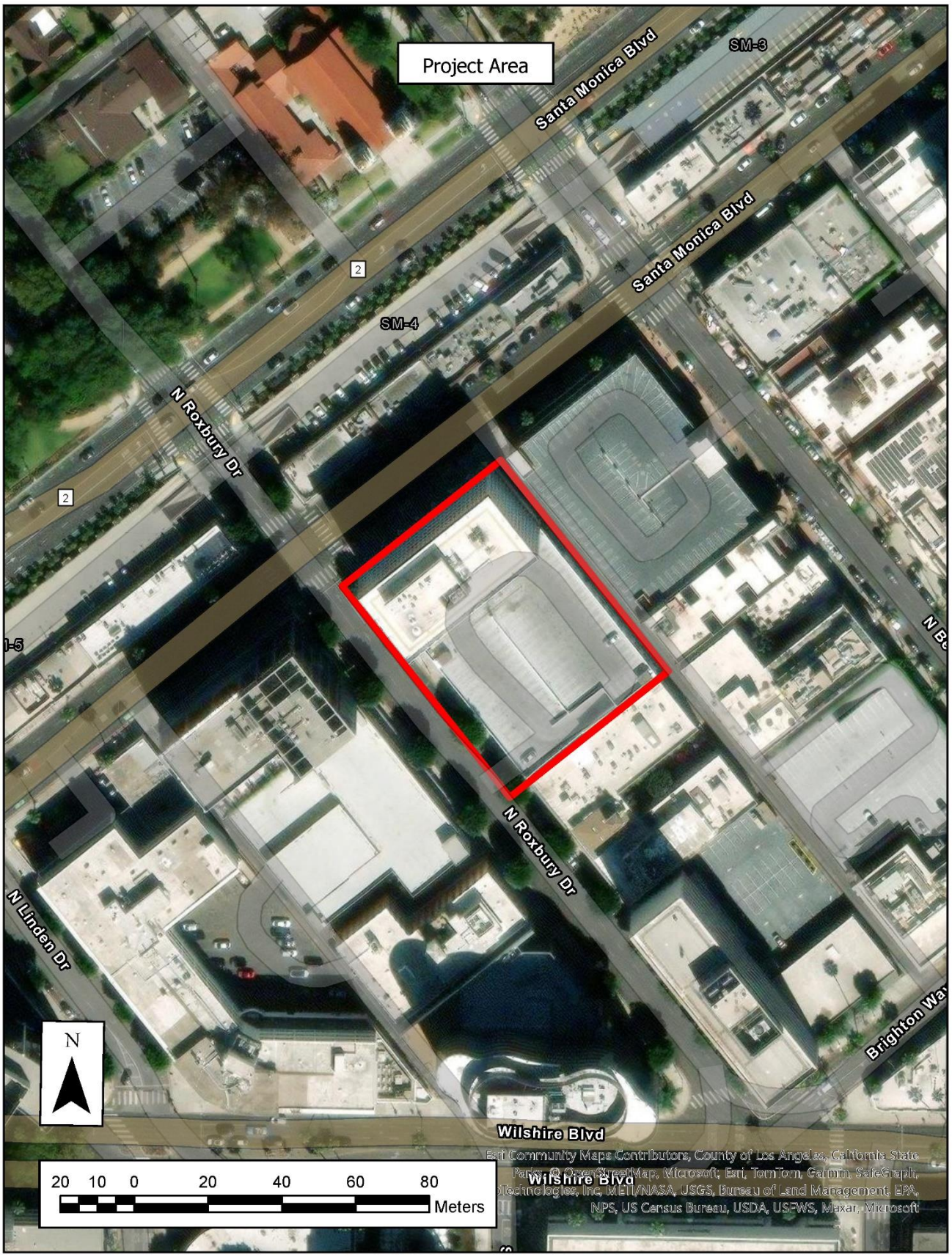
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July 9, 2024

Santa Rosa Band of Cahuilla Indians
Steven Estrada, Tribal Chairman
P.O. Box 391820
Anza, CA 92539
Via Email: sestrada@santarosa-nsn.gov

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Chairman Steven Estrada:

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City of Beverly Hills

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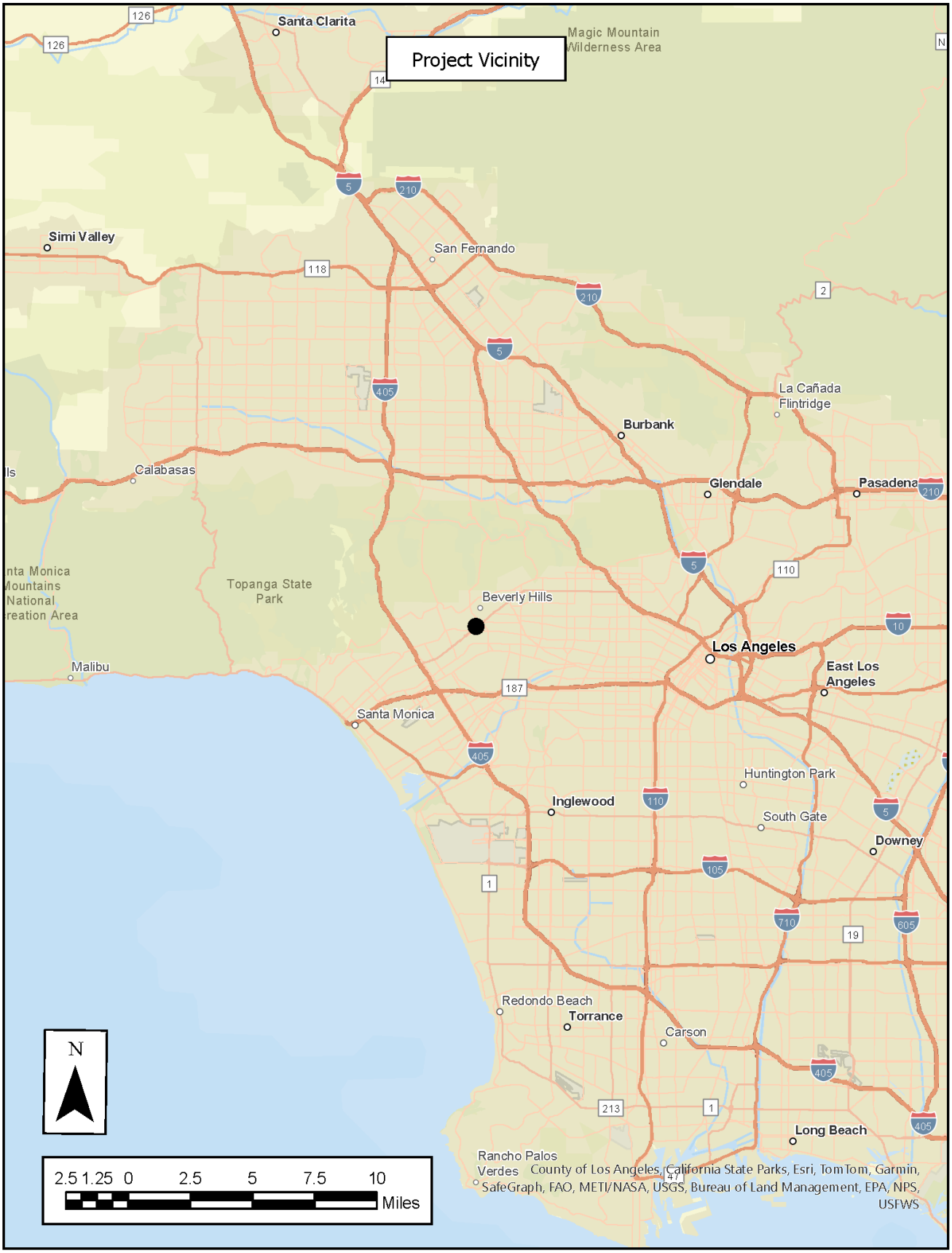
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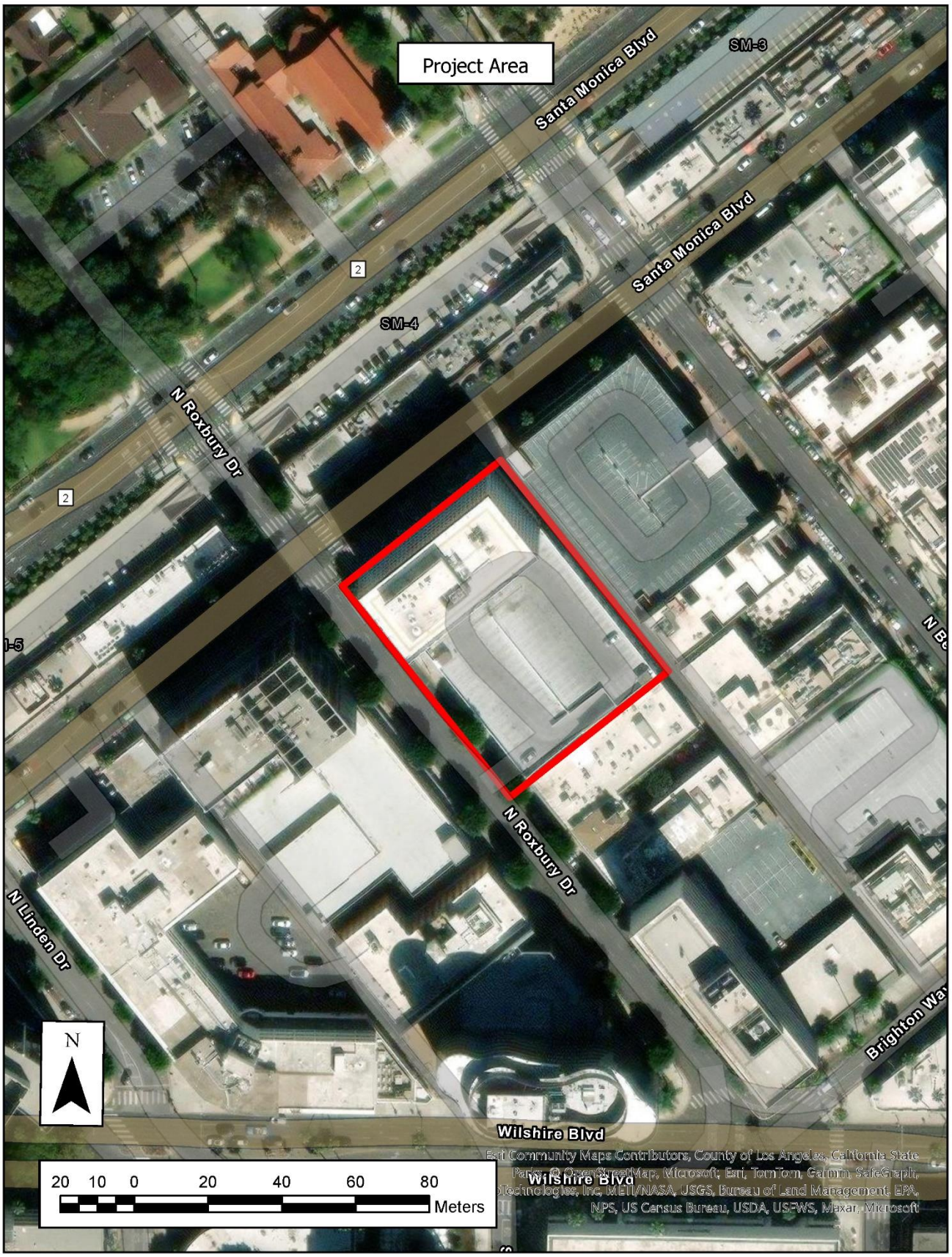
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July 9, 2024

Santa Rosa Band of Cahuilla Indians
Vanessa Minott, Tribal Administrator
P.O. Box 391820
Anza, CA 92539
Via Email: vminott@santarosa-nsn.gov

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Administrator Vanessa Minott:

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Sincerely,

Minjee Hahm, AICP
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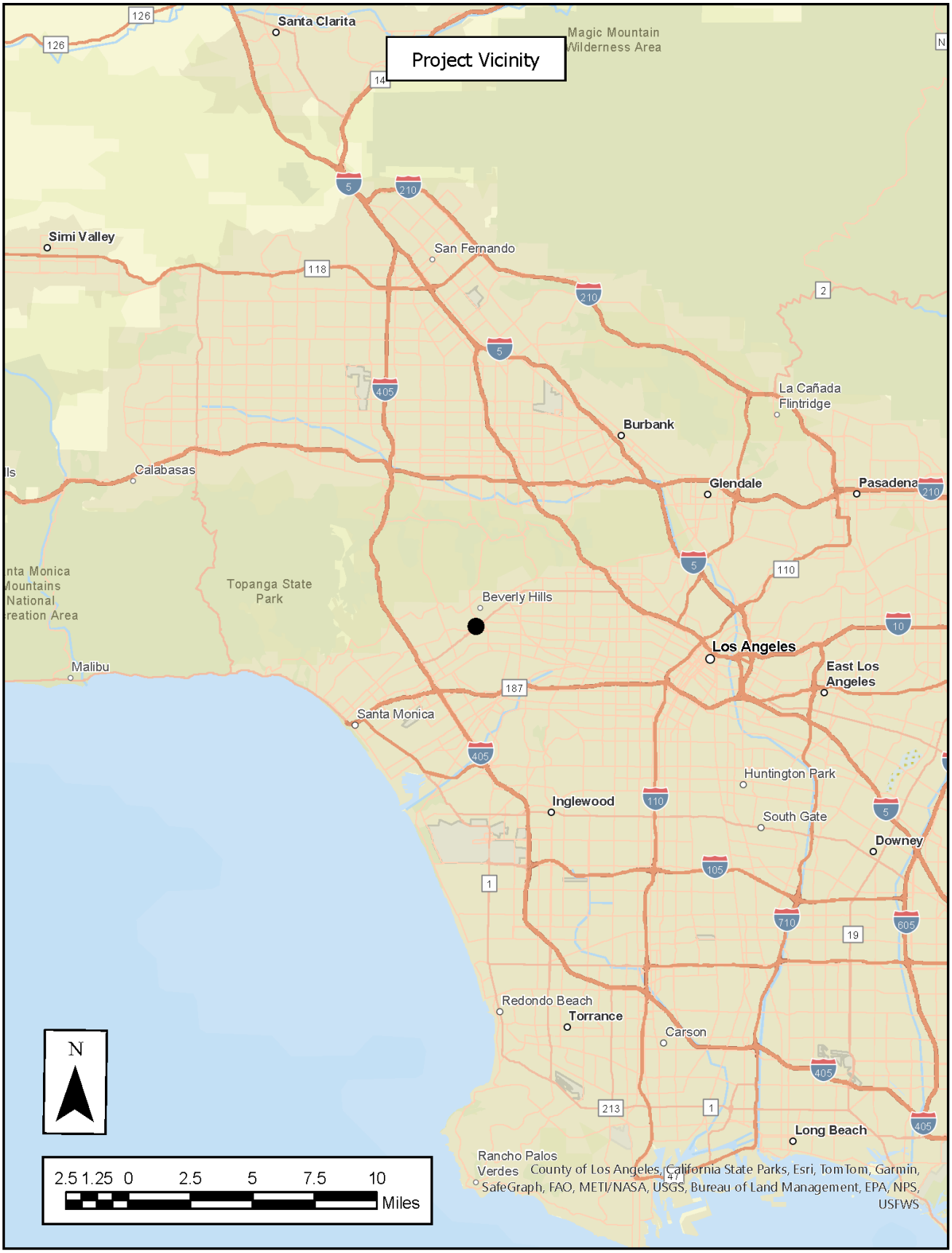
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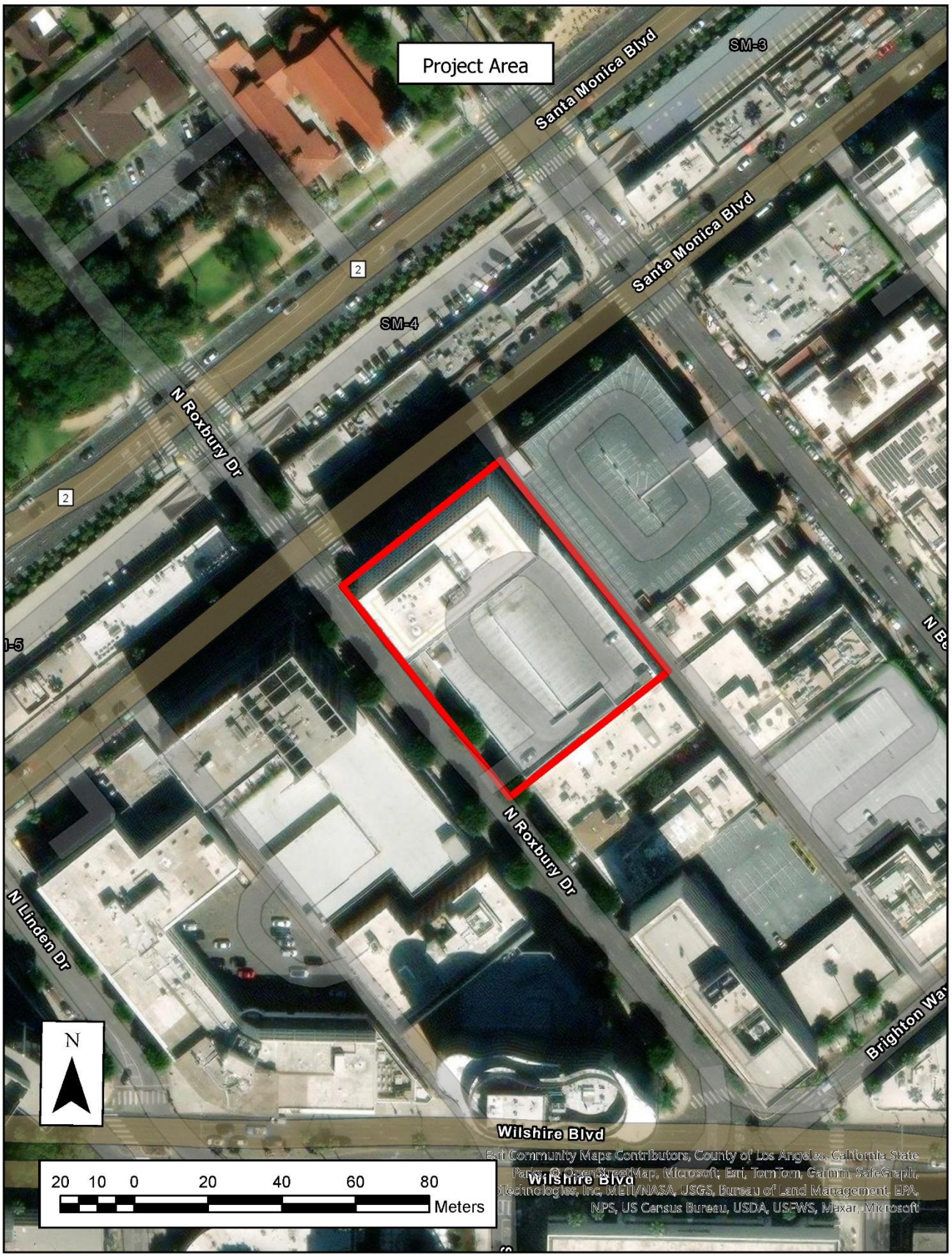
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July 9, 2024

Soboba Band of Luiseno Indians
Joseph Ontiveros, Tribal Historic Preservation Officer
P.O. Box 487
San Jacinto, CA 92581
Via Email: jontiveros@soboba-nsn.gov

RE: Invitation to Consult Pursuant to Assembly Bill 52 (CEQA) and Senate Bill 18 for the 450 North Roxbury Drive Project, City of Beverly Hills, Los Angeles County, California

Honorable Officer Joseph Ontiveros:

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City of Beverly Hills

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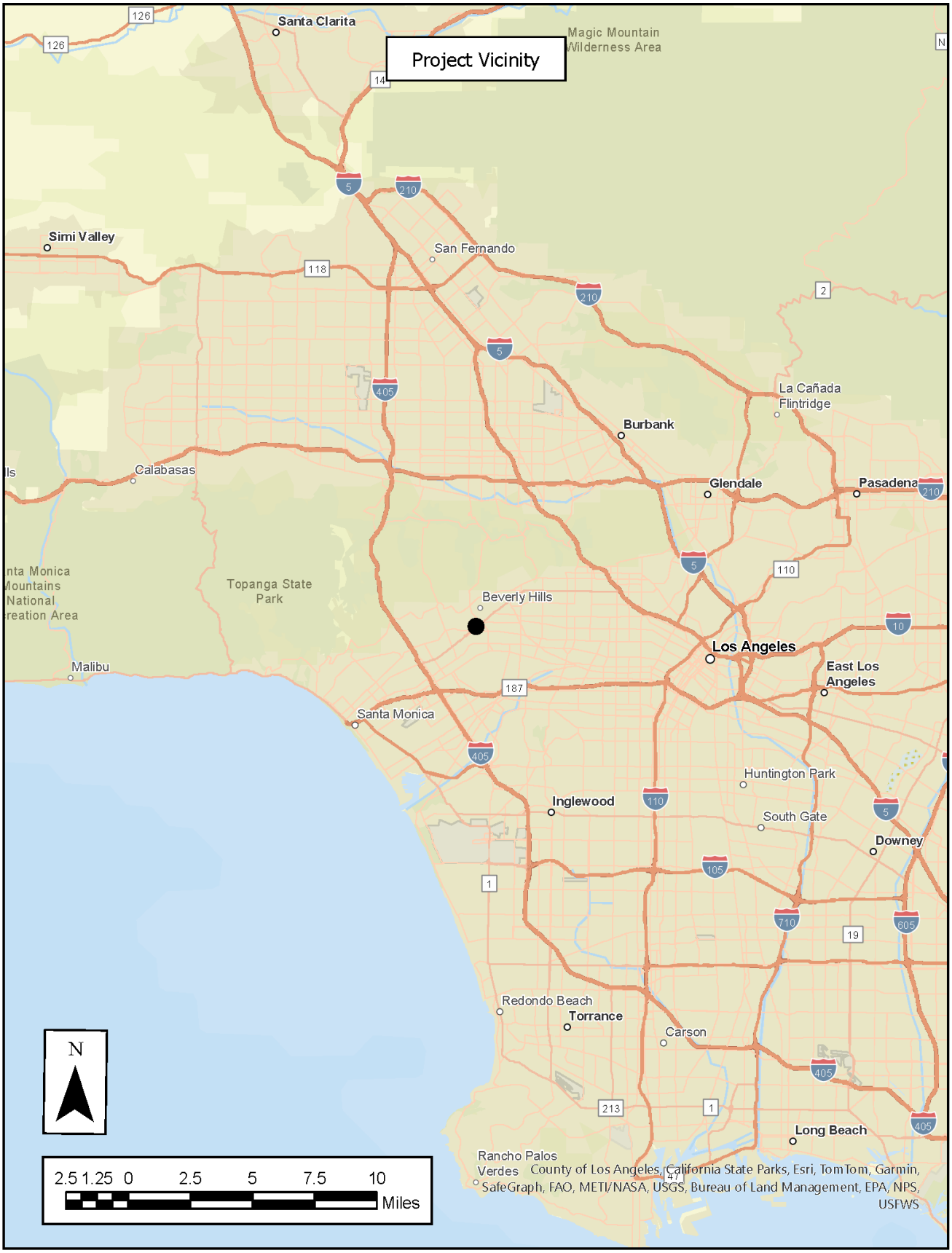
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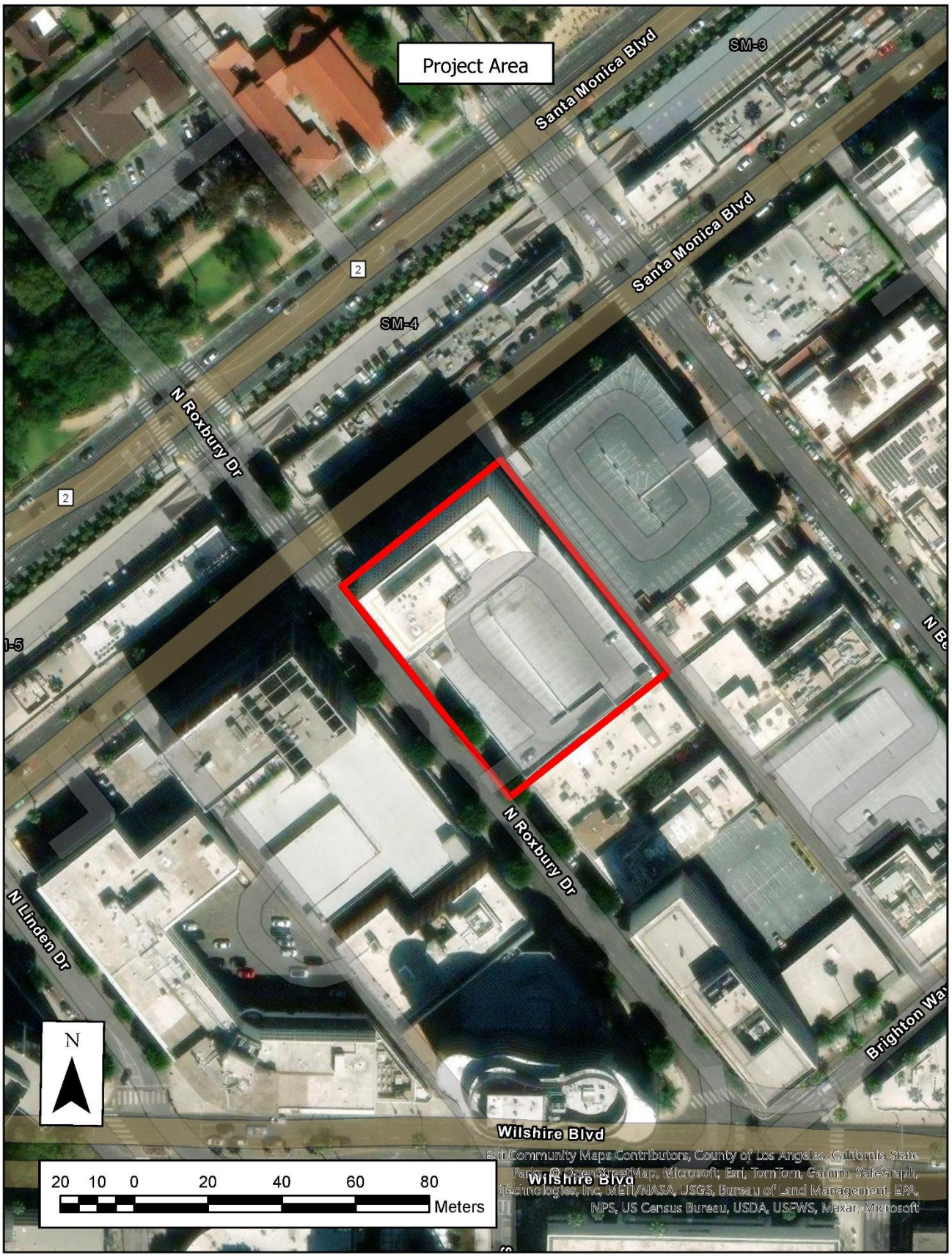
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July 9, 2024

Soboba Band of Luiseno Indians
Jessica Valdez, Cultural Resource Specialist
P.O. Box 487
San Jacinto, CA 92581
Via Email: jvaldez@soboba-nsn.gov

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Honorable Specialist Jessica Valdez:

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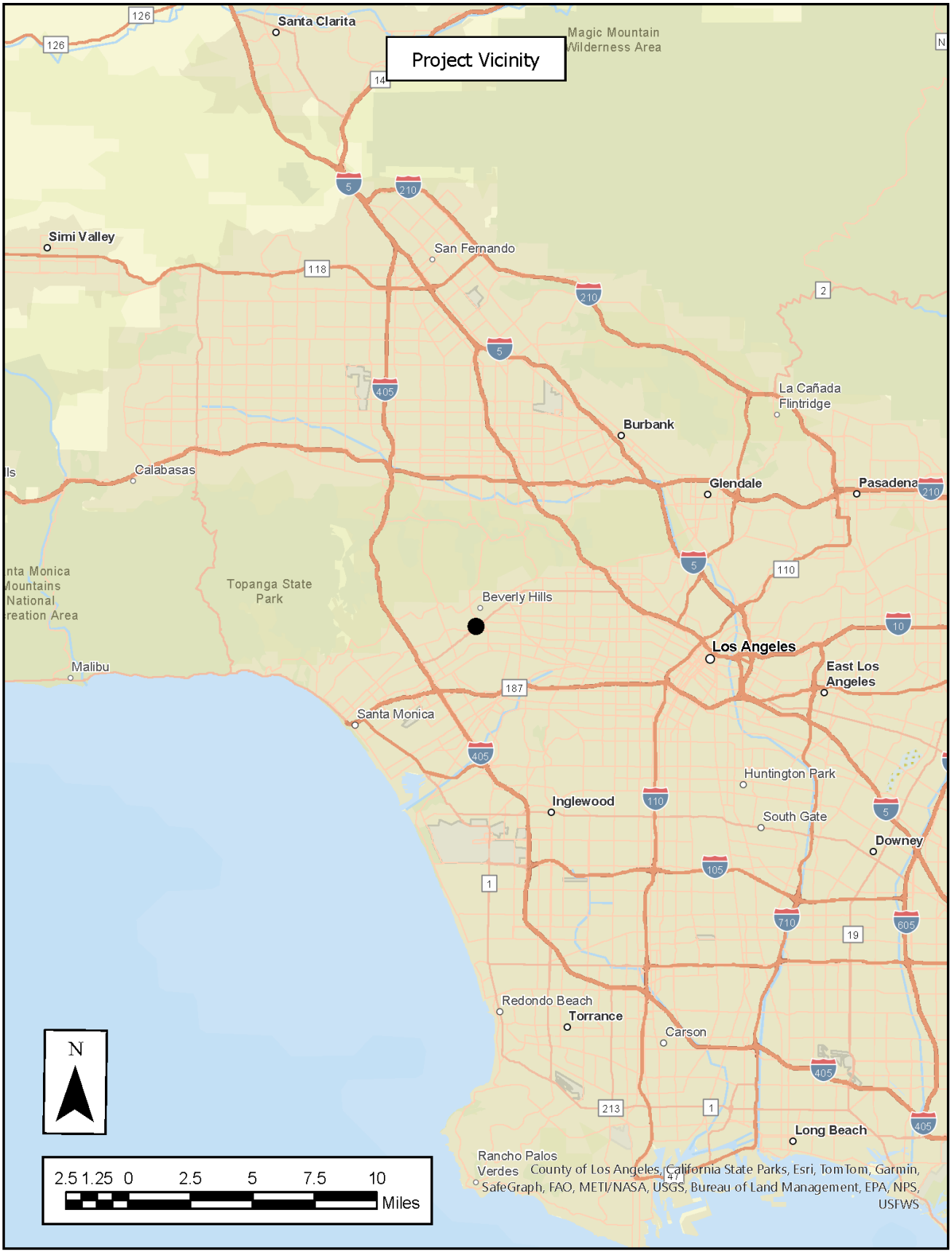
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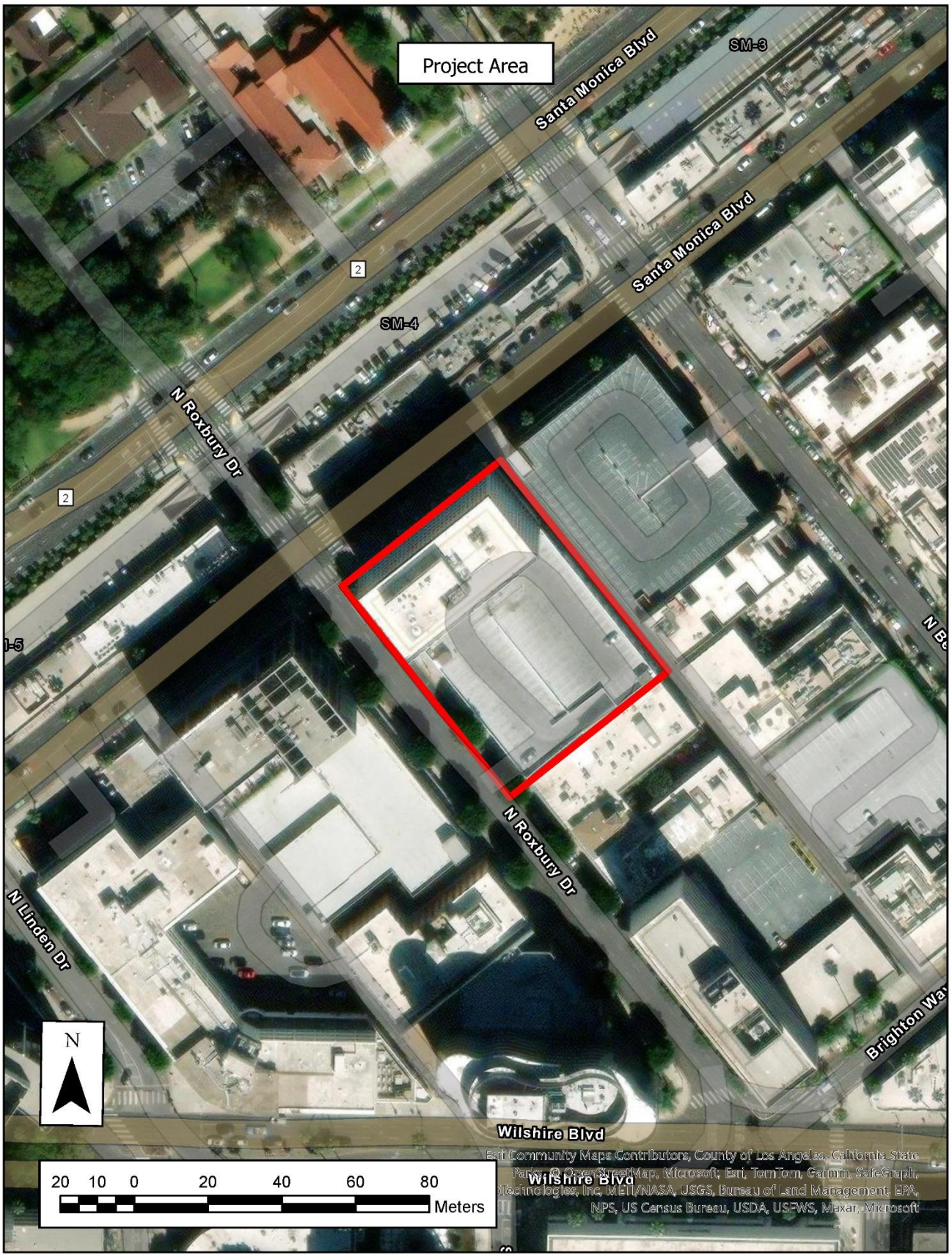
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Appendix H

Responses to Comments on the Draft
Initial Study/Negative Declaration

Kimley»Horn

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1.0 INTRODUCTION TO RESPONSE TO COMMENTS

This Final Initial Study/Negative Declaration (IS/ND) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code [PRC] Section 21000 et seq.) and CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.). The Final IS/ND incorporates, by reference, the Draft IS/ND (State Clearinghouse No. 2024090380) prepared by the City of Beverly Hills (City) for the 450 North Roxbury Drive Project (Project).

This Final IS/ND for the Project presents Sections 1 through Section 3:

- Section 1: Introduction and CEQA process
- Section 2: A list of persons, organizations, and/or public agencies commenting on the Draft IS/ND, and a copy of the written comments received on the Draft IS/ND
- Section 3: Written responses to each comment identified in Section 2

1.1 CEQA Process

The Notice of Intent (NOI) to adopt an IS/ND was posted on September 11, 2024, with the County Clerk in Los Angeles. The Draft IS/ND was circulated for a 23-day public review until October 3, 2024. The Draft IS/ND was circulated to federal, State, and local agencies and interested parties requesting a copy of the Draft IS/ND. Copies of the Draft IS/ND were made available at the following locations:

- City of Beverly Hills Website: https://www.beverlyhills.org/environmental
- City of Beverly Hills City Hall, Planning Division and Office of the City Clerk: 455 North Rexford Drive, Beverly Hills, CA 90210
- Beverly Hills Public Library: 444 North Rexford Drive, Beverly Hills, CA 90210

1.2 Notice of Determination

Pursuant to CEQA Guidelines Section 15094, the City will file a Notice of Determination (NOD) with the Office of Planning and Research and Los Angeles County Clerk within five working days of Project approval.

2.0 COMMENT LETTERS

The City received one comment letter during the public review period from the California Department of Transportation (Caltrans), District 7, on September 29, 2024. Each comment within the comment letter that requires a response is also assigned a number. For example, the first comment within the comment letter received from Caltrans is therefore labeled Comment 1-1 and the responses to each comment are correspondingly numbered, (i.e., Response 1-1). A copy of the comment letter is below. Responses to such comments are provided in Section 3.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897- 0673
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life

September 29, 2024

Minjee Hahm, AICP Associate Planner
City of Beverly Hills
455 North Rexford Drive
Beverly Hills, CA 90210

RE: 450 North Roxbury Drive Project–
Negative Declaration (ND)
SCH #2024090380
GTS #07-LA-2024-04622
Vic. LA 2 PM 3.683

Dear Minjee Hahm,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes to convert a portion of the ground level of the existing parking garage to approximately 6,797 square feet of retail space. The Project would remove 29 existing parking spaces, add 300 square feet of planter area, and restripe the remaining ground level of parking to replace the 3 removed Americans with Disabilities Act (ADA) parking spaces. The proposed total of parking spaces for the entire parking garage would allow the parking garage to continue to provide sufficient parking for the public. The three relocated ADA parking spaces would be located adjacent to the northeastern end of the proposed retail spaces. Pedestrian access would continue to be provided via the existing sidewalk along North Roxbury Drive. The Project would not modify the existing driveways and sidewalk. 1-1

The Applicant is requesting a Zone Text Amendment (ZTA) and General Plan Amendment (GPA) to allow an increase in the maximum FAR as a result of the conversion of the ground level of an existing parking structure abutting a public street to retail business(es), up to a depth of 70 feet from the front property line.

After reviewing the ND, Caltrans has the following comments:

Caltrans concurs that development of the Project, including the adoption of the associated ZTA and GPA, would have less than significant impacts to circulation. By removing excess parking to accommodate new retail spaces, the Project supports growth around 1-2

a transit hub that will provide opportunity for economic activity in a walkable area. Although the Project is not a transportation improvement project, it is located near existing transit routes on SR 2 to the north, Metro Line 20 bus stop to the southwest, Metro Line 4 bus stop to the northeast, and Metro Line 720 bus stop to the southwest. The Project is also northwest of the future Metro D Line Wilshire/Rodeo Station, which will support riders with mobility to places of employment and commercial use. 1-2 cont.

A Class 3 bicycle route is located along North Roxbury Drive, which is defined by the City's Complete Streets Plan as a designated preferred route for bicyclists on streets shared with motor vehicles. By upgrading the existing Class III bike route to a Class IV separated bikeway, this design element would ensure the safety of cyclists within the vicinity and provide network connectivity to the existing Class 4 bicycle lane on SR 2. 1-3

Any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will require a Caltrans transportation permit. Caltrans recommends limiting construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review. We look forward to the coordination of our efforts to ensure potential impacts to the highway facilities and traveling public are discussed and addressed before work begins. 1-4

If you have any questions, please contact project coordinator Frances Duong, at frances.duong@dot.ca.gov and refer to GTS #07-LA-2024-04622. 1-5

Sincerely,

Anthony Higgins

Anthony Higgins
Acting LDR/CEQA Branch Chief

Cc: State Clearinghouse

3.0 RESPONSES TO COMMENTS

Responses to individual comments are included herein.

Letter 1

California Department of Transportation (Caltrans), District 7
Anthony Higgins, Acting LDR/CEQA Branch Chief
100 S. Main Street, MS 16
Los Angeles, CA 90012

Comment 1-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes to convert a portion of the ground level of the existing parking garage to approximately 6,797 square feet of retail space. The Project would remove 29 existing parking spaces, add 300 square feet of planter area, and restripe the remaining ground level of parking to replace the 3 removed Americans with Disabilities Act (ADA) parking spaces. The proposed total of parking spaces for the entire parking garage would allow the parking garage to continue to provide sufficient parking for the public. The three relocated ADA parking spaces would be located adjacent to the northeastern end of the proposed retail spaces. Pedestrian access would continue to be provided via the existing sidewalk along North Roxbury Drive. The Project would not modify the existing driveways and sidewalk.

The Applicant is requesting a Zone Text Amendment (ZTA) and General Plan Amendment (GPA) to allow an increase in the maximum FAR as a result of the conversion of the ground level of an existing parking structure abutting a public street to retail business(es), up to a depth of 70 feet from the front property line.

Response 1-1

This comment acknowledges Caltrans' environmental review for the Project and includes a summary of the Project as described in the Draft IS/ND. As this comment does not raise any specific issues with respect to the content and adequacy of the Draft IS/ND, no further response is warranted.

Comment 1-2

After reviewing the ND, Caltrans has the following comments:

Caltrans concurs that development of the Project, including the adoption of the associated ZTA and GPA, would have less than significant impacts to circulation. By removing excess parking to accommodate new retail spaces, the Project supports growth around a transit hub that will provide opportunity for economic activity in a walkable area. Although the Project is not a transportation improvement project, it is located near existing transit routes on SR 2 to the north, Metro Line 20 bus stop to the southwest, Metro Line 4 bus stop to the northeast, and Metro Line 720 bus stop to the southwest. The Project is also northwest of the future Metro D Line

Wilshire/Rodeo Station, which will support riders with mobility to places of employment and commercial use.

Response 1-2

The comment provides information about the surrounding public transportation that is available to the Project and is noted on pages 8 and 9 of **Section 2.0: Project Description** of the Draft IS/ND. The comment indicates concurrence with the conclusion that the Project will not have significant impacts to circulation, thus not further response is warranted.

Comment 1-3

A Class 3 bicycle route is located along North Roxbury Drive, which is defined by the City's Complete Streets Plan as a designated preferred route for bicyclists on streets shared with motor vehicles. By upgrading the existing Class III bike route to a Class IV separated bikeway, this design element would ensure the safety of cyclists within the vicinity and provide network connectivity to the existing Class 4 bicycle lane on SR 2.

Response 1-3

The comment describes the bicycle routes on North Roxbury Drive and states benefits that would be associated with a Class IV separated bikeway. **Section 2.0: Project Description** of the Draft IS/ND describes the proposed components of the Project. As described therein, the Project would not upgrade the existing Class 3 bicycle route. Furthermore, the upgrade of the existing Class 3 bicycle route along North Roxbury Drive to a Class IV separated bikeway is not a proposed bike facility in the City's adopted Complete Streets Plan.

Nevertheless, with regards to the City's Complete Streets Plan, as described in **Section 4.17: Transportation** of the Draft IS/ND, construction of the Project may require temporary closure of the adjacent sidewalk, erection of construction fencing, and redirection of pedestrian access on North Roxbury Drive. These measures would be established in coordination with the City and would conform to City standards. The Project would not preclude enhancements to sidewalks or other policies, programs, or projects identified in the City's Complete Streets Plan. Similarly, the associated ZTA and GPA would only affect similar development within the Business Triangle. These other potential development projects would therefore also likely require only temporary closures of sidewalks, which would also be coordinated with the City and conform to City standards.

Comment 1-4

Any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will require a Caltrans transportation permit. Caltrans recommends limiting construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review. We look forward to the coordination of our efforts to ensure potential impacts to the highway facilities and traveling public are discussed and addressed before work begins.

Response 1-4

The comment provides information on the Caltrans transportation permit and construction traffic control plan that would be required for review by Caltrans, if necessary. The Project would comply with all relevant local and State regulations regarding the transport of equipment and materials during the construction phase, including Caltrans transportation permits.

Comment 1-5

If you have any questions, please contact project coordinator Frances Duong, at frances.duong@dot.ca.gov and refer to GTS #07-LA-2024-04622.

Response 1-5

This comment provides a conclusion to the comment letter and contact information for further information, as necessary. As this comment does not raise any specific issues with respect to the content and adequacy of the Draft IS/ND, no further response is warranted.