

1.0 Introduction



1.0 Introduction

This document is a Draft Environmental Impact Report (EIR) for the proposed Cheval Blanc Beverly Hills Project (herein referred to as the Project). The Project proposes the creation of the Cheval Blanc Beverly Hills Specific Plan, which would facilitate the orderly and efficient development of the Project Site by, among other things, establishing appropriate size, height, and density limits of a multiple-use, hotel-driven anchor development of up to 220,950 square feet and up to 115 guest rooms.

The Project as envisioned at this time would involve a development within the scope of the proposed Specific Plan including a single 212,034-square-foot, multiple-use building that would include a luxury hotel with 109 guest rooms including a penthouse, a private club offering facilities for social and recreational purposes, restaurant and retail uses, and other appurtenant uses related to hotel and club services and functions such as a wellness center and spa. The building would be constructed over a three-level subterranean parking garage which would include 178 parking spaces. The Project would also provide open space areas totaling 45,201 square feet. This includes a publicly-accessible 670 square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork. Additionally, 4,760 square feet of outdoor restaurant and bar spaces on levels six and seven and a 742-square-foot outdoor terrace on the seventh level would be provided. The outdoor restaurant and bar spaces and the outdoor terrace may be publicly accessible by reservation only unless otherwise reserved for hotel guests or club members and their respective guests. The remaining open space area would be for private use by hotel guests and club members.

This Draft EIR evaluates the Project's potential environmental impacts considering the maximum allowable floor area of 220,950 square feet and maximum number of guest rooms of 115 rooms per the Specific Plan.

This section of the Draft EIR includes an overview of the purpose and focus of this Draft EIR, the scope and content of this Draft EIR, and the environmental and public review processes as required under the California Environmental Quality Act (CEQA). Also included in this section of this Draft EIR is a summary of the comments received during the Notice of Preparation (NOP) review period as well as identifying the lead, responsible, and

trustee agencies for the Project. The Project is described in more detail in Section 2.0, Project Description, of this Draft EIR.

1.1 Purpose of this Draft EIR and Legal Authority

The Project requires the discretionary approval of the City of Beverly Hills; therefore, the Project is subject to the environmental review requirements of CEQA. As described in Section 15121 of the CEQA Guidelines (California Code of Regulations, Title 14), an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, if any, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, in accordance with Section 15121 of the CEQA Guidelines, the purpose of this Draft EIR is to inform public agency decision makers and the public of the potential significant environmental effects of the Project as well as any feasible mitigation measures, when applicable, that would reduce or avoid the Project's significant environmental effects.

This Draft EIR has been prepared as a "Project EIR" pursuant to Section 15161 of the CEQA Guidelines and will serve as the environmental document for all actions undertaken by the City of Beverly Hills, as Lead Agency, associated with the Project, as well as any actions by responsible or trustee agencies.

1.2 Lead, Responsible, and Trustee Agencies

The CEQA Guidelines define lead, responsible and trustee agencies. The City of Beverly Hills is the lead agency for the Project because it holds principal responsibility for approving the Project.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over a project. Responsible agencies include the Los Angeles Regional Water Quality Control Board, which regulates water quality in the region, and the South Coast Air Quality Management District, which regulates air quality in the region. The Draft EIR will also be submitted to these agencies for review and comment.

A "trustee agency" refers to a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California. CEQA Guidelines Section 15386 designates four agencies as trustee agencies, including the California Department of Fish and Wildlife, the State Lands Commission, the State Department of Parks and Recreation, and the University of California. The California Department of Fish and Wildlife serves as a trustee agency for this Project.

1.3 Scope and Content

An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible and trustee agencies, and other interested parties on November 13, 2020, for a 35-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas, which are studied in detail in this Draft EIR:

- Air Quality
- Cultural Resources
- Energy
- Geology and Soils (Paleontological Resources)
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (Energy Infrastructure)

Additionally, while the Initial Study fully evaluated the Project's potential impacts to biological resources and determined that such impacts would be less than significant, in response to a comment letter received from the California Department of Fish and Wildlife, potential impacts to bat species will also be further evaluated in this Draft EIR.

Based on the review of the Project and analysis completed as part of the Initial Study, as well as a review of comments received during the NOP process, the City of Beverly Hills determined that the Project would not have the potential to cause or otherwise

result in significant environmental effects related to aesthetics;¹ agriculture and forestry resources; air quality (odors); biological resources (except for potential impacts to bat species as evaluated in Section 4.2, Biological Resources, of this Draft EIR); cultural resources (human remains); geology and soils (except for paleontological resources); hazards and hazardous materials; hydrology and water quality; land use and planning (division of an established community); mineral resources; noise (airports); population and housing; public services; recreation; transportation (hazards, emergency access); utilities and service systems (water, wastewater, stormwater drainage, and telecommunications); and wildfires. Therefore, these areas are not analyzed further in this Draft EIR as they have been fully evaluated in the Initial Study. The Initial Study, which provides evidence supporting the conclusions that no significant impacts would occur for these issue areas, is included in Appendix A of this Draft EIR.

The level of detail contained throughout this Draft EIR is consistent with the requirements of CEQA and applicable court decisions. Specifically, Section 15151 of the CEQA Guidelines provides the standard of adequacy on which this document is based:

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

¹ *The Project meets the criteria of Public Resources Code (PRC) 21099 as an employment center project in a transit priority area (TPA). The Project is considered an employment center project, as that term is defined in PRC Section 21099(a)(1) because it is located on property that is zoned for commercial uses with a floor area ratio greater than 0.75. In addition, the Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site consists of lots located within an urban area that have been previously developed. The Project Site is also located within a TPA, as that term is defined in PRC Section 21099(a)(7), because it is located within 0.5 mile of an existing "major transit stop." In particular, the Project Site is located within approximately 0.5 mile of several Los Angeles County Metropolitan Transit Authority (Metro) bus routes, including Bus Routes 4, 16, 17, 704, and Rapid 720, with a service interval of 15 minutes or less during peak hours. In addition, construction of the Metro D Line (formerly Purple Line) Extension, which includes a subway station at Wilshire/Rodeo, is currently underway and is anticipated to be completed in 2025. The Project Site is located approximately 0.4 mile north of the Wilshire/Rodeo station currently under construction. Therefore, in accordance with PRC Section 21099(d)(1), the Project's aesthetic impacts shall not be considered significant impacts on the environment and therefore do not have to be evaluated under CEQA. Nonetheless, the Initial Study includes a discussion of aesthetics for informational purposes only and is attached as Appendix A to this Draft EIR.*

1.4 Environmental and Public Review Process

After deciding that a Draft EIR is required, the City of Beverly Hills, as Lead Agency, prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible and trustee agencies, and other interested parties on November 13, 2020, for a 35-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR in compliance with the standard set forth in CEQA Guidelines Section 15088.

Prior to making a decision on the Project, the City must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the City of Beverly Hills; and c) the decision making body reviewed and considered the information in the Final EIR prior to taking action on the Project (CEQA Guidelines Section 15090). Additionally, prior to approving the Project the City must make written findings for each identified significant environmental impact, if any, and must adopt a statement of overriding considerations of any significant unmitigable impacts finding that the benefits of the Project outweigh its environmental impacts (CEQA Guidelines Sections 15091 and 15093). Should it decide to approve the Project, the City, as Lead Agency, would file a Notice of Determination (NOD) (CEQA Guidelines Section 15094) with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (Public Resources Code Section 21167(c); CEQA Guidelines Section 15094).

A summary of the environmental impact review process, as required under CEQA, is illustrated in Figure 1.0-1 on page 1.0-6.

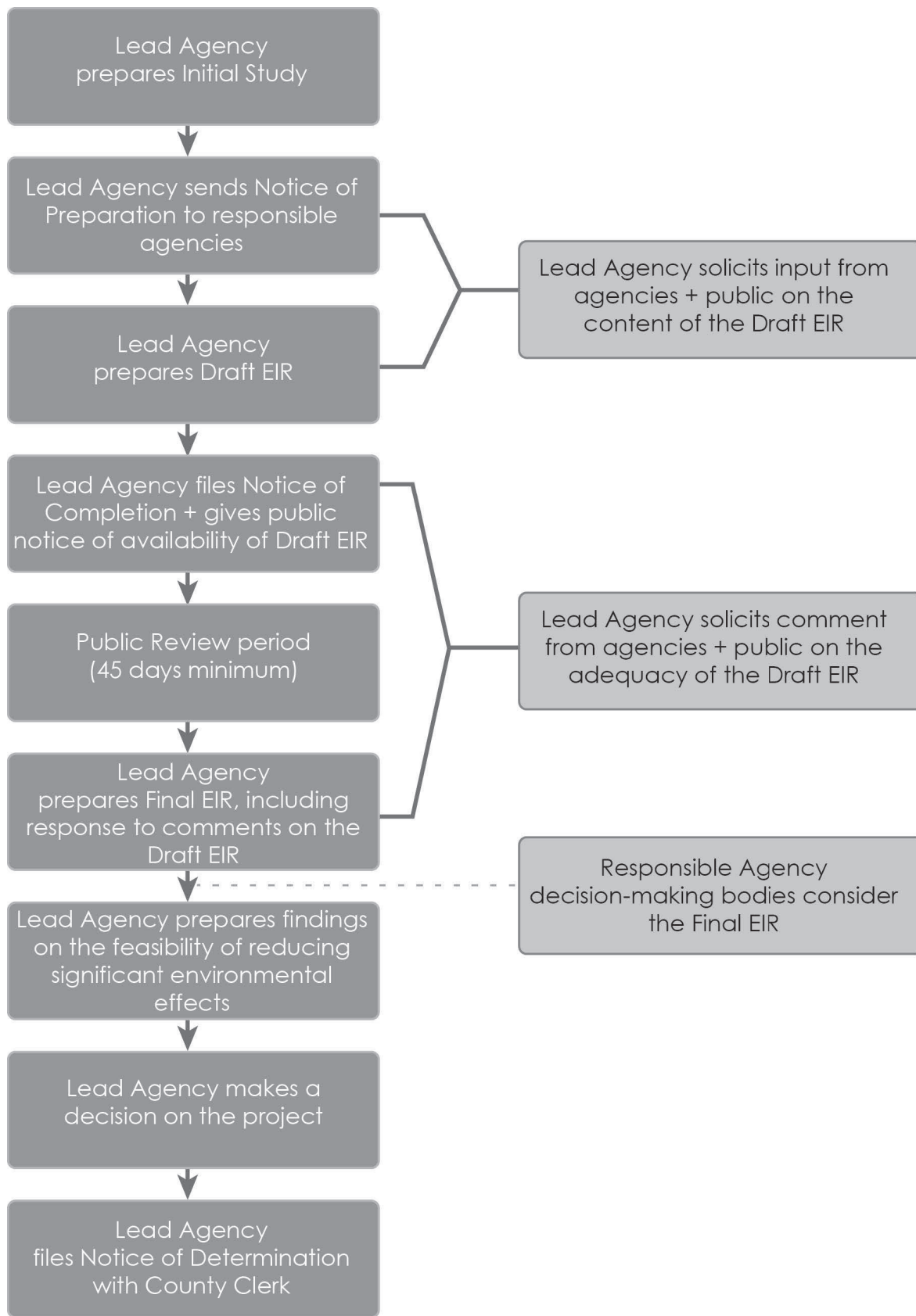


Figure 1.0-1
Environmental Review Process

1.5 Summary of NOP Comments

As previously discussed above, the City of Beverly Hills distributed a Notice of Preparation (NOP) of the EIR for a 35-day agency and public review period starting on November 13, 2020, and ending on December 18, 2020. In addition, the City held a virtual Scoping Meeting on Wednesday, December 2, 2020. Notices for the NOP and scoping meeting were mailed out to residents and property owners within 1,000 feet of the Project Site, posted online on the City's website and on-site at the Project Site, and published in both of the City's locally adjudicated newspapers. The Scoping Meeting, held from 6:30 P.M. to 8:00 P.M., provided information about the Project to public agencies, interested stakeholders and residents/community members. The meeting was held virtually online and via phone using the GoToMeeting platform. The City received 11 letters from agencies and individuals in response to the NOP during the public review period, as well as various verbal comments during the Scoping Meeting. Table 1.0-1 on page 1.0-8 summarizes the content of the letters and verbal comments and indicates how and where the issues raised are addressed in this Draft EIR.

**Table 1.0-1
NOP Comments and EIR Responses**

| Commenter | Comment/Request | How and Where it is Addressed in the Draft EIR |
|--|---|--|
| Agency Comments | | |
| California Department of Transportation (Caltrans) | Notes the nearest State facility to the project site is Interstate 405 and indicates they do not expect project approval to result in direct adverse impacts to the facility. | This comment is noted. An analysis regarding the Project's transportation impacts is provided in Section 4.9, Transportation, of this Draft EIR. |
| | Supports reducing the amount of parking whenever possible and suggests that the project is designed to induce demand for additional vehicle trips because of the amount of parking proposed. Recommends the implementation of Transportation Demand Management (TDM) measures as an alternative to requiring vehicle parking. | The Draft EIR evaluates the Project as proposed. Public Resources Code (PRC) Section 21099(d)(1) states that parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (as is the Project) shall not be considered a significant effect on the environment. ² |
| | Recommends secure bicycle parking for each guest room and long-term bicycle parking onsite to encourage bicycle mode of travel. | As detailed in Section 2.0, Project Description, of this Draft EIR, the Project includes 18 secure bicycle parking spaces, including charging facilities for e-bicycles, as well as employee lockers and showers. However, it is noted that guests are unlikely to arrive by bicycle given that hotel guests will likely be transporting luggage and arriving from locations out of the region. Notwithstanding, guests arriving by bicycle, or with a bicycle that needs to be stored within the Project Site, would be accommodated within the bicycle parking facilities to be provided by the Project and which conform to the City's adopted requirements for bicycle parking. Therefore, for the reasons mentioned above, it would not be necessary to provide one bicycle parking space per guest room, and the Project's 18 proposed bicycle parking |

² *The Project is considered an employment center project, as that term is defined in PRC Section 21099(a)(1), because it is located on property that is zoned for commercial uses with a floor area ratio greater than 0.75. In addition, the Project Site is located on an infill site, as that term is defined in PRC Section 21099(a)(4), because the Project Site consists of lots located within an urban area that have been previously developed. The Project Site is also located within a TPA, as that term is defined in PRC Section 21099(a)(7), because it is located within 0.5 mile of an existing "major transit stop." In particular, the Project Site is located within approximately 0.5 mile of several Los Angeles County Metropolitan Transit Authority (Metro) bus routes, including Bus Routes 4, 16, 17, 704, and Rapid 720, with a service interval of 15 minutes or less during peak hours. In addition, construction of the Metro D Line (formerly Purple Line) Extension, which includes a subway station at Wilshire/Rodeo, is currently underway and is anticipated to be completed in 2025. The Project Site is located approximately 0.4 mile north of the Wilshire/Rodeo station currently under construction.*

Table 1.0-1 (Continued)
NOP Comments and EIR Responses

| Commenter | Comment/Request | How and Where it is Addressed in the Draft EIR |
|--|--|---|
| | <p>spaces are sufficient.</p> <p>Recommends the project include walking and biking connections to the Wilshire/Rodeo station of the Metro D Line (formerly Purple Line) Extension Transit Project, which should be operational by 2025.</p> | <p>An analysis of the Project's impacts to bicycle and pedestrian facilities is provided in Section 4.9, Transportation, of this Draft EIR. As described therein, the Project includes secure bicycle parking spaces, including charging facilities for e-bicycles, as well as employee lockers and showers. Additionally, the Project site plan proposes to improve pedestrian facilities compared to existing conditions, providing pedestrian-friendly treatments along the public rights-of-way adjacent to the Project Site. Specifically, the Project would include pedestrian amenities such as a 670 square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous with the sidewalk and include private artwork, special paving for the public sidewalk right-of-way, dedication of additional surface right-of-way for public sidewalk uses along South Santa Monica Boulevard, and landscaping in parkways on the perimeter of the Project Site.</p> |
| | <p>States the proposed project would require a Caltrans transportation permit for the transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles. Recommends that large size truck trips be limited to off-peak commute periods.</p> | <p>As detailed in Section 2.0, Project Description, of this Draft EIR, the Project may require transportation permits from Caltrans for the transportation of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State facilities. In accordance with Section 5-1-205 of the City Municipal Code, construction of the Project would primarily occur between the hours of 8:00 A.M. and 4:00 P.M. Site demolition, excavation, and export activities would occur between the hours of 7:00 P.M. and 7:30 A.M.</p> |
| California Department of Fish and Wildlife | <p>Recommends the Draft EIR provide a discussion of potential impacts to bats and roosts from project construction and include bat-specific avoidance and/or mitigation measures.</p> | <p>As evaluated in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, due to the urbanized and disturbed nature of the Project Site and the surrounding area, and lack of large expanses of open space in the vicinity of the Project Site, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Additionally, palm trees in urban settings that are periodically maintained are not typically inhabited by bats.</p> <p>Notwithstanding, in response to this comment by the California Department of Fish and Wildlife, further evaluation of the Project's potential impacts to bats is included in Section 4.2, Biological Resources, of this Draft EIR. As discussed therein, based on the</p> |

**Table 1.0-1 (Continued)
NOP Comments and EIR Responses**

| Commenter | Comment/Request | How and Where it is Addressed in the Draft EIR |
|-----------|--|--|
| | | <p>results of the daytime bat habitat assessment and survey, there is marginal roosting habitat for bats in the street trees lining the sidewalk and no suitable habitat in the on-site buildings. Because the palm trees adjacent to the Project Site nonetheless appear to provide marginal bat roosting habitat, impacts to bats and roosts could be potentially significant under the Project. However, Mitigation Measures BIO-MM-1 and BIO-MM-2 are included in Section 4.2, Biological Resources, of this Draft EIR, to reduce Project impacts on bats and their roosts to a less than significant level.</p> |
| | <p>Recommends that all non-native trees be replaced with native trees on a 1:1 ratio.</p> | <p>The commenter's recommendations regarding the plantings for tree replacement are noted. However, given the highly urban nature of the Project Site and the small number of trees to be planted as part of the Project, environmental impacts resulting from tree replacement would not be significant. In addition, the Project would increase the number of trees onsite from zero to 7 trees, and the 15 existing street trees will be replaced at a 1:1 ratio. Nonetheless, the comment will be provided to City decision makers for their consideration.</p> |
| | <p>Recommends measures be taken to avoid impacts to nesting birds, including avoiding staging and construction activities during the avian breeding season from February 15 to August 31 (as early as January 1 for some raptors).</p> | <p>As discussed in the Initial Study prepared for the Project, included in Appendix A of this Draft EIR, in accordance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project Applicant would be required to conduct tree removal activities associated with the Project outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. These measures to be implemented by the Project in compliance with the Migratory Bird Treaty Act and the California Fish and Game Code would be incorporated into the Project as Conditions of Approval.</p> |
| | <p>Recommends the planting of native, locally appropriate plant species for landscaping on the Project Site, similar to species found in adjacent natural habitats. Further recommends the Draft EIR provide the landscaping plant palette and</p> | <p>The commenter's recommendations regarding the plantings for landscaping throughout the Project Site are noted. However, given the highly urban nature of the Project Site and the small amount of vegetation included as part of the Project, environmental impacts resulting from the planting of non-native vegetation as part of Project landscaping</p> |

**Table 1.0-1 (Continued)
NOP Comments and EIR Responses**

| Commenter | Comment/Request | How and Where it is Addressed in the Draft EIR |
|-----------|---|---|
| | <p>restrict use of species listed as 'Moderate' or 'High' by the California Invasive Plant Council.</p> | <p>for the Project would not be significant. Nonetheless, the comment will be provided to City decision makers for their consideration.</p> |
| | <p>Recommends a biological resources assessment of the project site that addresses and mitigates direct, indirect and cumulative impacts to biological resources.</p> | <p>An analysis regarding the Project's potential impacts to biological resources is provided in the Initial Study included in Appendix A of this Draft EIR and in Section 4.2, Biological Resources, of this Draft EIR. As discussed in the Initial Study, due to the urbanized and disturbed nature of the Project Site and the surrounding area, and lack of large expanses of open space in the vicinity of the Project Site, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. Additionally, palm trees in urban settings that are periodically maintained are not typically inhabited by bats. Based on the lack of habitat on the Project Site, it is unlikely any special status species listed by the California Department of Fish and Wildlife (CDFW) or by the U.S. Fish and Wildlife Service (USFWS) would be present within the Project Site. Furthermore, in accordance with the Migratory Bird Treaty Act and California Fish and Game Code, the Project Applicant would be required to conduct tree removal activities associated with the Project outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a buffer would be established until the fledglings have left the nest. These measures to be implemented by the Project in compliance with the Migratory Bird Treaty Act and the California Fish and Game Code would be incorporated into the Project as Conditions of Approval.</p> <p>Also, as further evaluated in Section 4.2, Biological Resources, of this Draft EIR, based on the results of the daytime bat habitat assessment and survey, there is marginal roosting habitat for bats in the 15 street trees lining the sidewalk and no suitable habitat in the on-site buildings. Because the palm trees adjacent to the Project Site nonetheless appear to provide marginal bat roosting habitat, impacts to bats and roosts could be potentially significant. However, Mitigation Measures BIO-MM-1 and BIO-MM-2 are included in Section</p> |

Table 1.0-1 (Continued)
NOP Comments and EIR Responses

| Commenter | Comment/Request | How and Where it is Addressed in the Draft EIR |
|---|---|--|
| | | 4.2, Biological Resources, of this Draft EIR, to reduce Project impacts on bats and their roosts to a less than significant level. |
| | Recommends the project description include construction staging areas and access routes and the Draft EIR to include a range of feasible alternatives that reduce impacts to sensitive biological resources and wildlife movement areas. | Section 2.0, Project Description, of this Draft EIR, includes construction access routes. The location of off-site construction vehicle staging areas or other off-site logistic areas will be determined as construction progresses. However, in light of the urbanized and previously disturbed nature of the Project Site and surrounding areas, construction staging access and access routes will not disturb sensitive biological resources or wildlife movement areas. Alternatives considered in this Draft EIR are discussed in Section 6.0, Alternatives, of this Draft EIR. |
| Southern California Association of Governments (SCAG) | Requests that the Draft EIR be sent to them for review, providing, at a minimum, the full public comment for review. Recommends assessing consistency with the adopted 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal) goals in table format. | The Draft EIR and its appendices will be sent to the SCAG during the public review period. The Project’s consistency with the adopted 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal) is addressed in Section 4.6, Greenhouse Gas Emissions, and Section 4.7, Land Use and Planning, of this Draft EIR. |
| | States that the Connect SoCal strategies are provided as guidance for lead agencies when considering proposed projects. | Connect SoCal strategies were reviewed and considered as guidance during preparation of the Draft EIR in Section 4.1, Air Quality, Section 4.6, Greenhouse Gas Emissions, Section 4.7, Land Use and Planning, and in Section 4.9, Transportation, of this Draft EIR. |
| | Provides the Connect SoCal adopted regionwide and Beverly Hills growth forecasts for population, households, and employment. | Comments are addressed in the Initial Study, included in Appendix A of this Draft EIR, and in Section 4.1, Air Quality, of this Draft EIR. As concluded in the population and housing section within the Initial Study, the Project’s potential impacts regarding population, housing, and employment would be less than significant, and no mitigation measures are required. |
| | Recommends that the lead agency review project-level mitigation measures contained in the Final Program Environmental Impact Report for Connect SoCal for guidance, as appropriate. | Project-level mitigation measures contained in the Final Program EIR for Connect SoCal were reviewed for guidance during preparation of this Draft EIR in Section 4.1, Air Quality, Section 4.6, Greenhouse Gas Emissions, and in Section 4.9, Transportation, of this Draft EIR. |
| South Coast Air Quality | Requests that the Draft EIR be sent to them for review, including all | The Draft EIR along with modeling data will be sent to the South Coast Air Quality Management District |

**Table 1.0-1 (Continued)
NOP Comments and EIR Responses**

| Commenter | Comment/Request | How and Where it is Addressed in the Draft EIR |
|------------------------------|--|---|
| Management District (SCAQMD) | appendices and modeling data related to air quality and greenhouse gas (GHG) emissions. Recommends use of CEQA Air Quality Handbook for guidance in preparing air quality analysis and use CalEEMod for analysis. | during the public review period. As noted in Section 4.1, Air Quality, of this Draft EIR, SCAQMD's CEQA Air Quality Handbook was used as guidance for preparing air quality analysis and CalEEMod was used for analysis. |
| | Requests calculation of regional and localized air quality impacts and comparison to SCAQMD thresholds. | The requested calculations and SCAQMD thresholds are provided in Section 4.1, Air Quality, of this Draft EIR. |
| | Requests construction-related and operation-related air quality analysis, including impacts from indirect sources. If construction and operation overlap, recommends comparing combined emissions to operational thresholds. | An analysis of the Project's potential construction-related and operation-related air quality impacts is provided in Section 4.1, Air Quality, of this Draft EIR. |
| | Recommends a mobile source health risk assessment, if the Project would generate diesel emissions from long-term construction or attract diesel-fueled vehicular trips. | A discussion regarding mobile sources is provided in Section 4.1, Air Quality, of this Draft EIR. As noted in Section 4.1, Air Quality, a health risk assessment was not conducted for the Project because the Project does not meet any of the criteria that would trigger the need for a health risk assessment. |
| | Requests mitigation measures to minimize or eliminate significant adverse impacts related to air quality, greenhouse gas emissions, and health risk. | An analysis regarding the potential for significant adverse impacts related to air quality and greenhouse gas emissions is provided in Section 4.1, Air Quality, and Section 4.6, Greenhouse Gas Emissions, of this Draft EIR. As discussed in the respective sections therein, Project-level and cumulative impacts related to air quality and greenhouse gas emissions would be less than significant during construction and operation of the Project. Therefore, no mitigation measures with regard to air quality and greenhouse gas emissions are required. With regard to health risk, as previously stated above, a health risk assessment was not conducted for the Project because the Project does not meet any of the criteria that would trigger the need for a health risk assessment. Therefore, no mitigation measures with regard to health risk are required. |
| | States that in the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Project in the EIR. | As described earlier in this section, the South Coast Air Quality Management District is identified as a Responsible Agency for the Project. |

Table 1.0-1 (Continued)
NOP Comments and EIR Responses

| Commenter | Comment/Request | How and Where it is Addressed in the Draft EIR |
|--|---|--|
| Native American Heritage Commission (NAHC) | The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the Project and provides a brief summary of portions of Assembly Bill (AB) 52 and Senate Bill (SB) 18 as well as the NAHC's recommendations for conducting cultural resources assessments. | As detailed in Section 4.10, Tribal Cultural Resources, of this Draft EIR, in compliance with the requirements of SB 18 and AB 52, the City of Beverly Hills Department of Community Development provided formal notification of the Project on October 16, 2020, to the Native American tribes traditionally affiliated with the area. Tribal Chairman Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians—Kizh Nation, responded to the Project notification conducted by the City requesting consultation. No communication or request for consultation was received from any of the other notified tribes within the response period. Consultation between the City and the Kizh Nation remains ongoing. |
| Individual Comments | | |
| Ronald Bloom | States concern regarding the potential for increased traffic. | An analysis regarding the potential for increased traffic is provided in Section 4.9, Transportation, of this Draft EIR. ³ |
| Crown Associates Realty | States concerns regarding traffic, community character, economic feasibility, and Project heights. | An analysis regarding the Project's transportation impacts is provided in Section 4.9, Transportation, of this Draft EIR. An analysis regarding impacts related to community character, economic feasibility and building heights is provided in Section 4.7, Land Use and Planning, of this Draft EIR. |
| Chanel Inc. | States concerns regarding reconfiguration of the alley which currently bisects the Project Site. | An analysis regarding the Project's transportation impacts, including those stemming from the reconfiguration of the alley which currently bisects the Project Site, is provided in Section 4.9, Transportation, of this Draft EIR. |
| Hermès of Paris | States concerns regarding reconfiguration of the alley which currently bisects the Project Site. | An analysis regarding the Project's transportation impacts, including those stemming from the reconfiguration of the alley which currently bisects the Project Site, is provided in Section 4.9, Transportation, of this Draft EIR. |
| Gregory Haller | Requests discussion in the Draft EIR of the Haller Diamond Museum and private office at 468 N. Rodeo Drive. | Based on information provided by the Applicant, the Haller Diamond Museum and private office is not a present tenant at the Project Site. |
| Danny Scroudy | Expresses support for the hotel as it | The commenter's support for the Project will be |

³ *Subsequent to the passage of Senate Bill 743 (2013), traffic congestion is not a subject that is addressed under CEQA, but will nonetheless be studied separately as part of the City's analysis of the requested entitlements.*

Table 1.0-1 (Continued)
NOP Comments and EIR Responses

| Commenter | Comment/Request | How and Where it is Addressed in the Draft EIR |
|--|---|---|
| | relates to the economic vitality of the City. | provided to City decision makers for their consideration. |
| <hr/> <i>Source: Eyestone Environmental, 2021.</i> | | |