4.0 Environmental Impact Analysis

4.9 Transportation

4.9.1 Introduction

This section of the Final EIR analyzes the Project's potential transportation impacts. This section is based on the Cheval Blanc Beverly Hills Specific Plan Transportation Impact Report (Transportation Impact Report) and the Cheval Blanc Beverly Hills Specific Plan Local Transportation Assessment (Local Transportation Assessment), both prepared by Fehr and Peers and dated September 2021. The Transportation Impact Report and the Local Transportation Assessment are included in Appendix H of this Final EIR. The analyses included in the Transportation Impact Report and the Local Transportation Assessment follows the City of Beverly Hills (City) October 2019 *Local Transportation Assessment Guidelines* (TAG) which are described in more detail below.

4.9.2 Environmental Setting

4.9.2.1 Regulatory Framework

4.9.2.1.1 California Senate Bill 743

Senate Bill (SB) 743, which went into effect in January 2014, directed the Governor's Office of Planning and Research (OPR) to develop revisions to the California Environmental Quality Act (CEQA) Guidelines by July 1, 2014, to establish new criteria for determining the significance of transportation impacts and define alternative metrics other than traffic level of service (LOS). This started a process that changes the requirements for transportation impact analysis under CEQA. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. Additionally, as discussed further below, as part of SB 743, parking impacts for particular types of development projects in areas well served by transit are not considered significant impacts on the environment. As set forth in SB 743, these changes to current practice were necessary to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

On August 6, 2014, OPR released the *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines*

Implementing Senate Bill 743. On January 20, 2016, OPR released the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, which was an update to the August 6, 2014, document, revising the text of CEQA Guidelines Section 15064.3 to establish vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts.

SB 743 also amended CEQA by adding Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."[1] A "transit priority area" is defined as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."[2] PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."[3] PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.[4]

4.9.2.1.2 CEQA Guidelines Section 15064.3

As discussed above, CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Under Section 15064.3, generally land use projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Additionally, projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

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1 *PRC Section 21099(d)(1).*

2 *PRC Section 21099(a)(7).*

3 *PRC Section 21064.3.*

4 *PRC Section 21099(a)(4).*

A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT and may revise those estimates to reflect professional judgment based on substantial evidence. As discussed further below, the VMT analysis in this section begins with a review of the baseline VMT metrics and VMT impact thresholds developed in conjunction with the City of Beverly Hills and based on OPR guidance and the City's adopted transportation impact thresholds. The Project is then evaluated under four VMT analysis screening options to determine if it may have a VMT impact and require further evaluation.

4.9.2.1.3 California Assembly Bill 32 and SB 375

The "California Global Warming Solutions Act of 2006," (Assembly Bill (AB) 32), outlines California's major legislative initiative for reducing greenhouse gas (GHG) emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020, a reduction of approximately 15 percent below emissions expected under a "business as usual" scenario. On September 8, 2016, the governor signed SB 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged).

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed in August 2008, enhances the state's ability to reach AB 32 goals by directing the California Air Resources Board (CARB) to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations (MPOs) are required to adopt a Sustainable Communities Strategy (SCS), which allocates land uses in the MPO's Regional Transportation Plan (RTP). Qualified projects consistent with an approved SCS or Alternative Planning Strategy (categorized as "transit priority projects") can receive incentives to streamline CEQA processing.

On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Southern California Association of Governments (SCAG) was assigned targets of an 8 percent reduction in per-capita GHG emissions from passenger vehicles by 2020 and a 19 percent reduction in per-capita GHG emissions from passenger vehicles by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 RTP/SCS titled Connect SoCal, which meets the requirements of SB 375.

4.9.2.1.4 Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On September 1, 2020, SCAG's Regional Council adopted an updated RTP/SCS known as the 2020–2045 RTP/SCS or Connect SoCal.[5] The purpose of the 2020–2045 RTP/SCS is to meet the mobility needs of the six-county SCAG region over the 2020-2045 planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.[6] Connect SoCal's core vision is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal includes new initiatives at the intersection of land use, transportation, and technology to reach the region's GHG reduction goals. Connect SoCal implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. Connect SoCal establishes a land use vision of center focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation.

4.9.2.1.5 LA Metro First Last Mile Strategic Plan

The First Last Mile Strategic Plan and Planning Guidelines (First Last Mile Plan) outlines an approach for identifying barriers and planning for/implementing improvements for connecting transit services to nearby trip origins (e.g., an individuals' home) and destinations (e.g., an individuals' place of employment). Examples of first/last mile improvements include but are not limited to: pedestrian and bicycle infrastructure, signage and wayfinding, and shared use services (e.g., car share). The First Last Mile Plan developed what is known as "The Pathway," a proposed countywide transit access network designed to enhance transit accessibility. The Pathway is a series of active transportation improvements that connect to and from Metro Rail and Bus Rapid Transit (BRT) stations.

Within the study area, the City of Beverly Hills worked with Metro to develop the Wilshire/Rodeo Station Pathway Plan for the Metro D (formerly Purple) Line Rodeo Station, which is 0.4 mile walking distance from the Project Site. The Pathway Plan notes that Wilshire Boulevard would benefit from numerous first/last mile improvements, including bus stop enhancements, high-visibility crosswalks, street furniture, and street trees where

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[5] *SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.*

[6] *Ibid.*

needed. The Pathway Plan also identifies a series of bicycle improvements that will help facilitate station access, such as intersection treatments to create a bicycle-friendly environment.

4.9.2.1.6 City of Beverly Hills General Plan

The City's General Plan, originally adopted in 1977 and amended and readopted in 2010, is a policy document that serves as a comprehensive, long-term plan for future development. The General Plan sets forth goals, objectives, and policies to guide land use policies and to meet the existing and future needs of the City. The General Plan consists of a series of documents which includes the seven state-mandated elements: Land Use, Open Space, Circulation, Conservation, Noise, Safety, and Housing (amended and adopted in December 2013, certified by the State in February 2014). In addition, the City's General Plan includes three additional elements addressing Historic Preservation, Economic Sustainability, and Public Services. The Circulation Element has two overarching objectives. First, the neighborhoods of Beverly Hills should be preserved and enhanced, including limiting negative effects caused by vehicles. Secondly, vehicles should move into, out of, or through Beverly Hills as expeditiously as possible. Eleven primary goals and associated policies are identified in the Circulation Element that support these objectives of the City. Refer to Section 4.7, Land Use and Planning, of this Final EIR for a complete list of the goals and policies in the Circulation Element applicable to the Project. A discussion of some of the goals and policies in the Circulation Element applicable to the Project is also provided below.

4.9.2.1.7 Complete Streets and Streetscape Planning in Beverly Hills

The City of Beverly Hills adopted a citywide Complete Streets Plan in April 2021. The Complete Streets Plan creates a blueprint for transportation improvements that balance the needs of all road users: bicyclists, pedestrians, transit riders, and motorists. The goal of the Complete Streets Plan is to provide more options for people to choose the mode that best works for their trip type, and a network of streets where individual modes will be prioritized. The Complete Streets Plan identifies a series of bicycle improvements that will help facilitate access to the Metro D (formerly Purple) Line Rodeo Station. The Complete Streets Plan also identifies pedestrian corridors to enhance the overall pedestrian experience. Potential improvements could include new and upgraded sidewalks, tightened curb radii to slow vehicle speeds, and mid-block crossings, among others.

The Complete Streets Plan identifies North Santa Monica Boulevard, Wilshire Boulevard, Burton Way, Olympic Boulevard, and Beverly Drive as the City's proposed Transit Enhanced Network. Bus stop enhancements, such as shelter, seating, lighting, trash/recycling bins, poles/signs with route information and schedules, a system map (or

link to one), a paved boarding area, and ADA-compliant pedestrian connections, are identified along these corridors.

The Project's consistency with the applicable goals and policies set forth in the Complete Streets Plan is discussed in the impact analysis below.

4.9.2.1.8 Beverly Hills Master Plan of Streets

The Beverly Hills Master Plan of Streets (Master Plan of Streets) is the City's planned roadway network. The Master Plan of Streets shows the planned width and alignment of the City's roadways, including a network alleys which bisect the City's blocks, including that of the Project Site. Beverly Hills Municipal Code (BHMC) Section 10-6-2 requires projects to be consistent with the Master Plan of Streets. The Project's proposed amendments to, and consistency with the Master Plan of Streets is discussed in the impact analysis below.

4.9.2.2 Existing Conditions

The following discussion describes key streets and transit routes serving the Project Site, along with other development and infrastructure projects that could affect the transportation analysis Study Area (the geographic area analyzed in the Transportation Impact Report, which includes the area generally bounded by North Santa Monica Boulevard to the north, North Cañon Drive to the east, Rodeo Drive to the west, and Brighton Way to the south) prior to completion of the Project.

4.9.2.2.1 Existing Street Systems

The existing street system in the Study Area consists of a regional roadway system, including highways, avenues, and collector and local streets that provide regional, sub regional, and local access and circulation within the Study Area.

4.9.2.2.1.1 Streets and Highways

The Project is located in the Beverly Hills Business Triangle and served by a grid system of streets. Listed below are the primary streets and highway that provide regional and local access to the Project Site:

- South Santa Monica Boulevard—South Santa Monica Boulevard or "Little Santa Monica Boulevard" parallels North Santa Monica Boulevard through the City of Beverly Hills and would provide the primary access to the Project Site. The roadway begins east of Moreno Drive and becomes Burton Way at Rexford

Drive. The roadway has two travel lanes in each direction. The roadway is classified as a Principal Arterial adjacent to the Project Site.

- Rodeo Drive—Rodeo Drive runs north-south through the City of Beverly Hills. The roadway begins at the intersection with Sunset Boulevard and terminates just south of the south City limit at the intersection with Beverwil Drive. Within the Study Area, the roadway has two travel lanes in each direction. The roadway is classified as a local street within the Study Area.

- Beverly Drive—Beverly Drive runs north-south through the City of Beverly Hills. The roadway begins in the Beverly Crest neighborhood of the City of Los Angeles and terminates just north of Interstate 10, also in the City of Los Angeles. Within the Study Area, the roadway has two travel lanes in each direction and is classified as a local street north of South Santa Monica Boulevard and a Minor Arterial from South Santa Monica Boulevard to the south City limit.

- North Santa Monica Boulevard—North Santa Monica Boulevard is a major north-south roadway and is referred to as North Santa Monica Boulevard in the City of Beverly Hills. Within the Study Area, this roadway generally travels in a southwest to northeast direction. To the west, Santa Monica Boulevard continues outside of the study area through the City of Los Angeles where it connects to the Interstate 405 and extends into and terminates in the City of Santa Monica. To the east, Santa Monica Boulevard continues into the City of West Hollywood and eventually terminates east of US Highway 101. Within the Study Area, the roadway has two travel lanes in each direction in the City of Beverly Hills and three travel lanes in each direction in the City of Los Angeles. The roadway forms a portion of California State Route 2 and is designated as a Principal Arterial in the City of Beverly Hills.

- Cañon Drive—Cañon Drive runs north-south through the City of Beverly Hills. The roadway begins at the intersection with Sunset Boulevard and terminates just north of the south City limit at the intersection with Beverly Drive. Due to construction of the Metro D (formerly Purple) Line, Cañon Drive is currently closed just north of the Wilshire Boulevard intersection. Within the Study Area, the roadway has two travel lanes in each direction and the roadway is classified as a local street.

- Brighton Way—Brighton Way runs northeast-southwest through central Beverly Hills. It begins at Wilshire Boulevard in the west and terminates at Crescent Drive in the east. Brighton Way is one-way and flows in the southwest direction. Within the Study Area, the roadway provides two travel lanes and is classified as a local street.

- Public Alley Mid-block Between North Rodeo Drive and North Beverly Drive—An existing public alley bisects the Project Site. The alley runs north-south and is

currently accessed from South Santa Monica Boulevard. The alley is an approximately 20-foot wide, one-way southbound facility located mid-block between North Rodeo Drive and North Beverly Drive that connects South Santa Monica Boulevard to the north with Wilshire Boulevard to the south. The alley provides access to loading and employee/customer parking areas for a variety of commercial and retail businesses fronting along both North Rodeo Drive and North Beverly Drive between South Santa Monica Boulevard and Brighton Way, along with an exit-only driveway for a private/public parking garage at 421 North Beverly Drive.

Figure 4.9-1 on page 4.9-9 identifies the roadway designations of streets within the Study Area.

4.9.2.2.1.2 Public Transit Service

The Study Area is served by bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro). Every six months, typically in June and December, Metro Operations undergoes a service change program where bus schedules are adjusted to accommodate ridership demands and improve connections between Metro Bus and Rail. Metro provides service on multiple bus lines with frequent service (at least every 15 minutes during weekday peak hours) in the Study Area. Due to the reduction in ridership caused by the COVID-19 pandemic and related lockdown orders, Metro reduced service on many routes in 2020. In response to increasing ridership demands, Metro implemented increased service beginning December 13, 2020. Metro's Board adopted Motion 27.1 in February 2021,[7] committing to restoring pre-pandemic-level 7 million annualized revenue service hours for bus lines by September 2021, and in its April 14, 2021[8] Budget Development Update designated funding to achieve this goal.

In addition to restoring transit service, Metro adopted the NextGen Bus Plan in 2020, a once-in-a-generation overhaul of bus routes and service design concepts intended to provide faster and more frequent bus service, including during off-peak periods, better reliability and accessibility to key destinations, better connectivity with municipal transit operators, and improved perception of safety onboard buses and at bus stops. Some of the bus routes in Beverly Hills were modified as a result of the NextGen Bus Plan. The NextGen Bus Plan recently went into operation in June 2021 and discontinued Line 16 bus service west of San Vicente Boulevard (service continues east/west on Third Street

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[7] *LA Metro, Recap of Proceedings for Thursday, February 25, 2021, Motion 27.1, http://media.metro.net/board/recap/2021/2021-0225-recap-rbm.pdf, accessed July 9, 2021.*

[8] *LA Metro, April 14, 2021, Budget Development Update, https://media.metro.net/2021/7-Apr-21-FY22 Budget-Presentation.pdf, accessed July 9, 2021.*

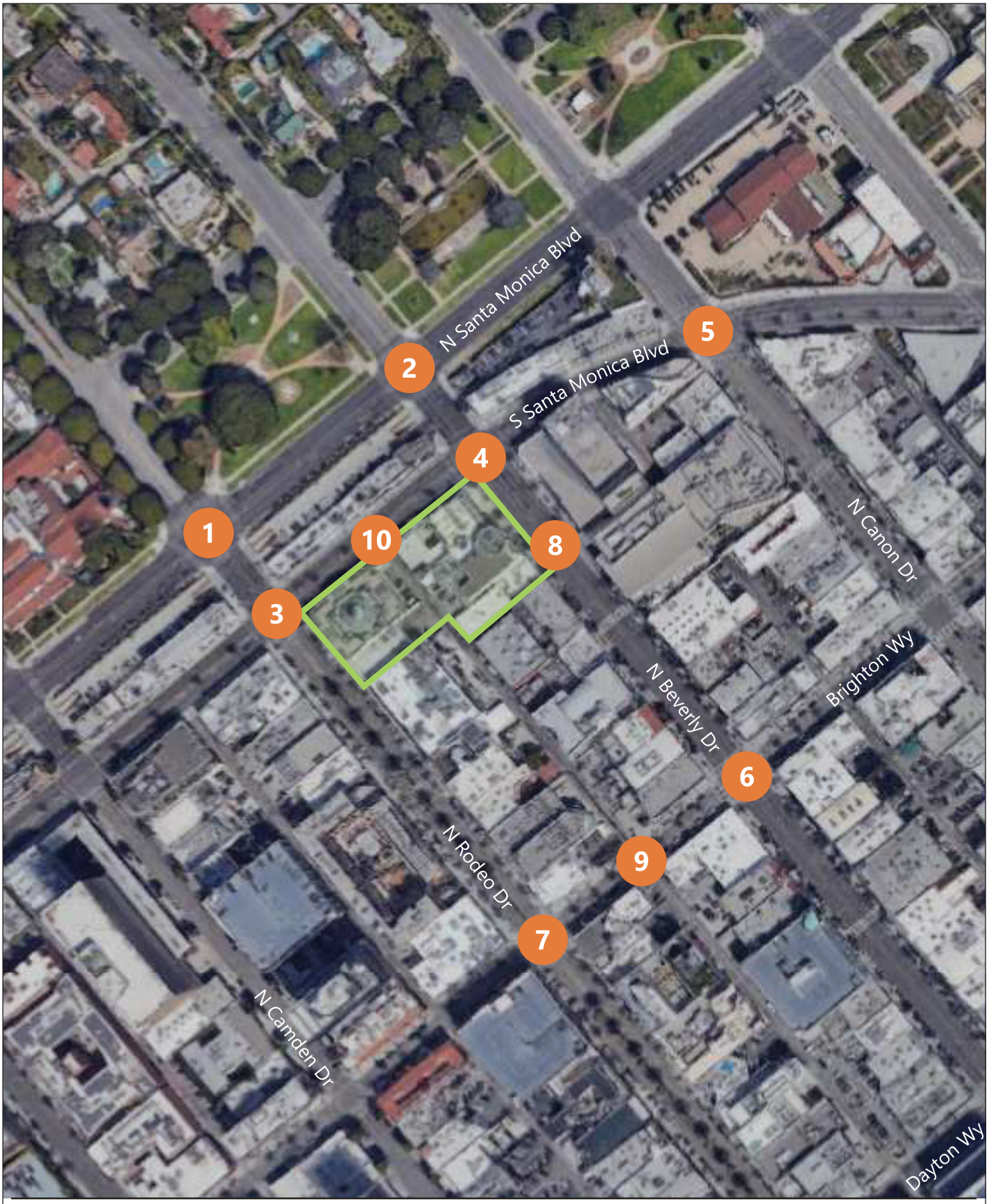

Figure 4.9-1
Roadway Designations in Study Area

Source: Eyestone Environmental, 2021.

between West Hollywood and downtown Los Angeles at six to 10-minute frequencies.) A total of 14 stops for Line 16 were eliminated in the City of Beverly Hills on Burton Way and North Santa Monica Boulevard. A new line, Line 617, provides service between the Expo Light Rail Station on Venice Boulevard and a new mini-transit hub located at Cedars Sinai Hospital, and then continues west through Beverly Hills along Burton Way and Beverly Drive. Line 617 operates every 45 minutes on weekdays and every 60 minutes on weekends. This new service on Burton Way replaces the service formerly provided by Line 16. The service routes and frequencies that reflect these recent service changes, as well as service frequencies in 2019 and early 2020 prior to the pandemic that Metro has committed to returning to by September 2021, are described below. For lines with stops within one half-mile of the Project Site, walking distances are also provided. The following provides a brief description of the bus lines providing service within the Study Area:

- Metro Rapid Line 704—Line 704 provides express service between downtown Los Angeles and the City of Santa Monica with principal service along North Santa Monica Boulevard as part of Metro's Rapid network. The line travels along Sunset Boulevard and Santa Monica Boulevard connecting the communities of downtown Los Angeles, Echo Park, Silver Lake, West Hollywood, Beverly Hills, Century City, Westwood, West Los Angeles, and Santa Monica. As of the December 2020 service changes, buses operate along North Santa Monica Boulevard approximately every 25 minutes on weekdays and weekends. Prior to the reduced service levels due to the pandemic, service was provided every 10 to 30 minutes on weekdays and weekends. The closest Line 704 bus stop to the proposed Project is located on the north side of North Santa Monica Boulevard at Crescent Drive (0.3 mile).

- Metro Rapid Line 720—Line 720 provides an express service between East Los Angeles and the City of Santa Monica with principal service along Wilshire Boulevard as part of Metro's Rapid network. The line travels along Wilshire Boulevard connecting the communities of Beverly Hills, Boyle Heights, Brentwood, Commerce, downtown Los Angeles, East Los Angeles, Hancock Park, Koreatown, Park La Brea, Santa Monica, and Westwood. As of the December service changes, buses operate every five to 15 minutes along Wilshire Boulevard during the peak weekday travel hours and approximately every 10 to 15 minutes on weekends. Prior to the reduced service levels due to the pandemic, service was provided as often as every two to 10 minutes during peak hours on weekdays and every four to 10 minutes on weekends. The closest Line 720 bus stop to the proposed Project is located on the northeast corner of the intersection of Wilshire Boulevard & South Santa Monica Boulevard (0.4 mile).

- Metro Line 4—Line 4 provides service between downtown Los Angeles and the City of Santa Monica with service along North Santa Monica Boulevard. It travels along Santa Monica Boulevard connecting the communities of Echo Park, Silver Lake, West Hollywood, Beverly Hills, Century City, West Los Angeles, and

Santa Monica. Line 4 is a local service bus and has frequent stops along Santa Monica Boulevard. Most stops are approximately one to two blocks apart. As of the December 2020 service changes, service is provided approximately every 15 minutes during the peak hours on weekdays. Daytime service on weekends is also provided approximately every 15 minutes. Prior to the reduced service levels due to the pandemic, service was provided every eight to 15 minutes on weekday peak hours and approximately every 10 to 15 minutes on weekends. The closest stops to the Project Site are located on both sides of North Santa Monica Boulevard at the intersection with Camden Drive (0.15 mile) and on the north side of the street (westbound) at Crescent Drive (0.3 mile).

- Metro Line 20—Line 20 provides service between downtown Los Angeles and the City of Santa Monica with service along Wilshire Boulevard. It travels along Wilshire Boulevard connecting the communities of Beverly Hills, Los Angeles, Hancock Park, Park La Brea, Santa Monica, UCLA, West Los Angeles and Westwood. Line 20 is a local service bus and has frequent bus stops along Wilshire Boulevard. Most stops are approximately one to two blocks apart. As of the December 2020 service changes, service is provided every 12 to 20 minutes during peak hours on weekdays and bus headways are approximately 15 to 30 minutes on weekends. Prior to the reduced service levels due to the pandemic, service was provided every five to 12 minutes on weekday peak hours and approximately every 10 to 15 minutes on weekends. The closest Line 20 bus stop to the proposed Project is located on the south side of Wilshire Boulevard at Rodeo Drive (0.4 mile).

- Metro Line 617—Line 617 provides services between Beverly Hills and Culver City. The line travels along Beverly Dr, Santa Monica Boulevard, Crescent Drive, Burton Way, 3rd Street, San Vicente, La Cienega and Robertson Boulevard. Line 617 connects the communities of Beverlywood, Beverly Hills, Pico–Robertson, La Cienega Heights, and Downtown Culver City. As of the June service changes, weekday service is approximately every 45 minutes during both peak and off-peak hours. Weekend service is every hour. Within the study area, the closest stop to the Project Site is located on the west side of Beverly Drive just north of Brighton Way in the southbound direction (0.1 mile).

- Antelope Valley Transit Authority (AVTA) Line 786—AVTA Line 786 provides morning service between Hollywood and West Los Angeles with primary service along Wilshire Boulevard as part of Antelope Valley Transit Authority's network. There are four bus stops located adjacent to the Rodeo Hotel and Retail Project. Within the vicinity of the Project, service for the line is provided approximately every 20 to 30 minutes during the morning runs. There is no service on weekends. The closest Line 786 bus stop to the proposed Project is located on the north side of Wilshire Boulevard at Rodeo Drive (0.4 mile).

4.9.2.2.2 Existing Parking and Site Access

The Project Site includes surface parking in the southwest portion of the Project Site. Vehicular access to the Project Site is available through the existing alley that bisects the Project Site with its entrance on South Santa Monica Boulevard and exit on Brighton Way; entry to and exit from the below grade parking at 461 North Beverly Boulevard is off of South Santa Monica Boulevard. Pedestrian and bicycle access is via North Beverly Drive, Rodeo Drive, and South Santa Monica Boulevard.

4.9.2.2.3 Existing Pedestrian and Bicycle Facilities

4.9.2.2.3.1 Pedestrian Facilities

A majority of the roadways within the Study Area have sidewalks and crosswalks. There are sidewalks along the roadways that border the Project Site including South Santa Monica Boulevard, North Beverly Drive, and North Rodeo Drive. The existing alley bisecting the Project Site and the south side of North Santa Monica Boulevard lack sidewalks. There are also crosswalks and pedestrian “walk/don’t walk” indicators at the signalized intersections in the Study Area.

A pedestrian pathway is also located through the Beverly Gardens Park located north of the Project Site along North Santa Monica Boulevard. In 2018, as part of the North Santa Monica Boulevard Reconstruction Project, the City completed the implementation of eight raised crosswalks connecting the decomposed granite pedestrian path through Beverly Gardens Park across intersections.

4.9.2.2.3.2 Bicycle Facilities

As defined by the California Bicycle Transportation Act of 1993, bicycle facilities generally consist of four types of facilities: Class I are multi-use or shared use paths; Class II are bike lanes; Class III are bike routes or signed shared roadways, and Class IV are separated bikeways or cycle tracks that are protected from vehicular traffic via a vertical barrier. Within the Study Area, North Santa Monica Boulevard has Class II bicycle lanes that are enhanced through green paint in the City of Beverly Hills (from the western City limit just west of the Project Site to the eastern City limit at Doheny Drive). The closest bikeshare station to the Project Site is at the corner of South Santa Monica Boulevard and Camden Drive.

4.9.2.3 Future Improvements

4.9.2.3.1 Planned Transit Service

The Metro D Line (formerly the Purple Line) Extension will extend the existing D Line subway from its current terminus at Wilshire/Western to a proposed new station in Westwood. Sections 1 and 2 of the Metro D Line Extension are currently under construction. Section 1 is expected to begin operations in 2023 and includes one new station in Beverly Hills at Wilshire/La Cienega and two new stations in Los Angeles (Wilshire/La Brea and Wilshire/Fairfax). Section 2 is expected to begin operations in 2025 and includes one new station in Beverly Hills at Wilshire/Rodeo and one just west of the City at Century City/Constellation. Section 3 of the Metro D Line Extension Project is currently in pre-construction and is anticipated to open for operations in 2026 with two new stations (Wilshire/Westwood and Wilshire/VA Hospital). The station planned for Wilshire/Rodeo as part of Section 2 is closest to the Project Site. In November 2020, the City approved the construction of the North Portal which would provide an entrance/exit on the west side of North Beverly Drive, within the existing street right-of-way, north of Wilshire Boulevard. The walking distance between the Project Site and the North Portal is 0.4 mile.

The City of Beverly Hills Complete Streets Plan identifies North Santa Monica Boulevard and Beverly Drive as part of the City's proposed Transit Enhanced Network. Bus stop enhancements, such as shelter, seating, lighting, trash/recycling bins, poles/signs with route information and schedules, a system map (or link to one), a paved boarding area, and ADA-compliant pedestrian connections, are identified along North Santa Monica Boulevard, including the bus stops on Cañon Drive at both North Santa Monica Boulevard and South Santa Monica Boulevard, closest to the Project Site.

4.9.2.3.2 Planned Pedestrian and Bicycle Facilities

The City of Beverly Hills Complete Streets Plan contains a vision for transportation improvements that balance the needs of all road users including bicyclists and pedestrians.

Within the Study Area, the Complete Streets Plan identifies a series of bicycle improvements that will improve facilities for bicyclists traveling in the City and help facilitate access to the Metro D (formerly Purple) Line Rodeo Station, including a new Class IV protected bicycle lane on Beverly Drive, a new Class II bicycle lane on Cañon Drive, and a new Class III bicycle boulevard on Brighton Way. The Complete Streets Plan also identifies pedestrian corridors to enhance the overall pedestrian experience. Pedestrian corridor improvements are envisioned on South Santa Monica Boulevard. Potential improvements could include new and upgraded sidewalks, tightened curb radii to slow vehicle speeds, and mid-block crossings, among others.

4.9.2.4 Future Without Project Conditions

As discussed in Section 2.0, Project Description, of this Final EIR, the Project is expected to be completed by year 2026. As such, the Transportation Impact Report and Local Transportation Assessment assume the completion of construction in year 2026. During this period, traffic conditions in the Study Area would be affected by other development projects and transportation infrastructure improvements. A list of other development projects (related projects) was prepared based on information provided by the City of Beverly Hills as well as recent studies of projects in the Study Area. The related projects are detailed in Section 3.0, Environmental Setting, of this Final EIR. While the buildout years of the related projects are uncertain and may well be beyond the Project's buildout year, and notwithstanding that some may not be approved or developed, all related projects were considered. Therefore, the projected traffic growth as a result of the related projects is a conservative estimate. The transportation network within the Study Area could also be affected by regional improvement plans and programmed improvements implemented prior to completion of the Project, as discussed above in Section 4.9.2.3, Future Improvements.

4.9.3 Project Impacts

4.9.3.1 Thresholds of Significance

The Project would have a significant impact related to transportation if it would:

Threshold (a): Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Threshold (b): Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b).

Threshold (c): Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Threshold (d): Result in inadequate emergency access.

This section of the Final EIR provides an analysis of the Project's potential impacts related to Thresholds (a) and (b). The Project's potential impacts related to the balance of the transportation issues (Thresholds (c) and (d)) were fully evaluated in the Initial Study included as Appendix A of this Final EIR and were found to be less than significant without mitigation. Provided below is a summary of the impact analysis included in the Initial Study prepared for the Project.

With regard to Threshold (c), the roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. Additionally, as concluded by the Alley Study completed by Hirsch Green on April 28, 2020, included in Appendix IS-9 of the Initial Study,[9] the elimination of the existing portion of the alley bisecting the site that connects to South Santa Monica Boulevard and the relocation of the alley such that access would be provided from North Beverly Drive would not substantially increase hazards or result in an incompatible use. As concluded in the Alley Study, no significant impacts to vehicular access or to the operations of the alley are expected, and the location and operations of the Project's loading bays will not significantly impact the alley. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the types of commercial uses already present in the surrounding area. Thus, no impacts related to increased hazards due to a design feature or incompatible use would occur, and no further analysis of this topic in the EIR is required.

Regarding Threshold (d), as discussed in the Initial Study, the public alley will remain accessible during each phase of construction (with a potential for a limited number of intermittent closures subject to City approval). Specifically, the new segment of the relocated alley would be constructed during Phase I of construction and the existing segment that currently bisects the Project Site would be demolished during Phase II. Limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day for the installation or upgrading of local infrastructure. Such activities could potentially require temporary lane closures adjacent to the Project Site. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project does not propose the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, the Project would comply with Beverly Hills Fire Department (BHFD) access requirements and applicable BHFD regulations regarding safety. Furthermore, the Alley Study completed for the Project concluded that fire trucks and other emergency vehicles would be able to maneuver the 90-degree turn the alley relocation would create.[10] As concluded in the Alley Study, no significant impacts to vehicular access or to the operations of the alley are expected. Therefore, the Project would not result in inadequate emergency access to

[9] *It is noted that an updated analysis of alley operations was prepared and is included in Appendix H.4 of this Final EIR. The updated alley operations reflect several design features that have been modified to provide additional clearance for trucks maneuvering in the alley and to/from the proposed loading dock.*

[10] *It is noted that an updated analysis of alley operations was prepared and is included in Appendix H.4 of this Final EIR. The updated alley operations reflect several design features that have been modified to provide additional clearance for trucks maneuvering in the alley and to/from the proposed loading dock.*

the Project Site or surrounding uses. Impacts regarding inadequate emergency access would be less than significant, and no further analysis of this topic in an EIR is required.

4.9.3.2 Methodology

4.9.3.2.1 Requirements for Transportation Assessments

As previously discussed, SB 743 directed OPR to "prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the guidelines adopted pursuant to Section 21083 establishing criteria for determining the significance of transportation impacts of projects within transit priority areas…Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion within a transit priority area, shall not support a finding of significance pursuant to this division…."

On August 6, 2014, and again on January 20, 2016, OPR released guidance implementing SB 743 and establishing vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts. As of July 1, 2020, these provisions apply statewide.

The City of Beverly Hills formally adopted the use of VMT for CEQA transportation impacts on October 10, 2019, in its CEQA Transportation Analysis Update (Resolution No. 1901). Therefore, LOS is no longer an acceptable metric for analyzing transportation impacts under CEQA. As discussed in the Local Transportation Assessment prepared for the Project, while LOS no longer constitutes a CEQA impact, it can still be used to inform decision makers on the overall effects of a project. Accordingly, the City of Beverly Hills developed Local Transportation Assessment Guidelines at the time it adopted its new VMT-focused transportation thresholds in October 2019. The City's Local Transportation Assessment Guidelines include analysis of LOS. As such, an LOS analysis was prepared for the Project as part of the Local Transportation Assessment and is included therein.

4.9.3.2.2 Consistency with Plans, Programs, Ordinances, or Policies

As described above, Transportation Threshold (a) requires an analysis of a project's potential to conflict with plans, programs, ordinances, or policies that address the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, the impact analysis below will evaluate the Project's potential to conflict with the plans, programs, ordinances, and policies listed above in the Regulatory Framework section of this chapter.

4.9.3.2.3 Vehicle Miles Traveled

VMT generated under baseline conditions and under the Project conditions were calculated to analyze potential VMT impacts of the Project in accordance with SB 743.

4.9.3.2.3.1 VMT Impact Thresholds

CEQA allows lead agencies to set or apply their own significance thresholds for VMT. As discussed above, the City of Beverly Hills CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. The CEQA Transportation Analysis Update states that a land use project would result in a significant VMT impact if it would generate VMT per capita higher than 15-percent below the existing average household VMT per capita for the regional average. This is consistent with OPR's guidance finding that a VMT per capita or per employee that is 15 percent or more below that of existing development is a reasonable and achievable threshold in determining significant transportation impacts under CEQA.

Per the CEQA Transportation Analysis Update, the Transportation Impact Report prepared for the Project and included in Appendix H of this Final EIR, utilized the SCAG RTP/SCS trip-based model to estimate the regional baseline VMT and the baseline VMT for the City, then identified a daily home-based VMT per-capita impact threshold of 12.3 and a daily home-based work VMT per-employee impact threshold of 15.0 for the region in which the Project is located. Therefore, the Project's overall VTM impact would be less than significant if the Project's average home-based VMT per capita is equal to or lower than 12.3 and the Project's average home-based work VMT per employee is equal to or lower than 15.0.

Other types of trips generated by the Project, including Non-Home-Based trips (trips to a non-residential destination originating from a non-residential use at the Project Site), are not factored into the VMT per capita and VMT per-employee thresholds as those trips are typically localized and are assumed to have a negligible effect on the VMT impact assessment.

Based on the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) document, the City of Beverly Hills adopted four screening criteria that the City may use to identify if a proposed project is expected to cause a less-than-significant impact without conducting a detailed study: (1) project size; (2) locally serving retail; (3) project location in a low VMT area; and (4) project accessibility to transit. The four screening criteria are detailed below and applied to various components of the Project to determine if the Project has the potential to result in a VMT impact. Once a project (or project component for mixed-use projects where only one element of the project meets the

screening criteria) qualifies under one of the following screening criteria, the project (or, if applicable, a project component) is screened out from further consideration:

- **Screening Criteria 1: Project Size:** Land use projects that generate less than 110 daily trips are presumed to have less than significant VMT impacts absent substantial evidence to the contrary. Therefore, these projects are screened out from completing a VMT analysis based on project size.

- **Screening Criteria 2: Locally Serving Retail:** Land use projects that have local-serving retail uses, defined as commercial projects with retail uses less than 50,000 square feet, are presumed to have less than significant VMT impacts absent substantial evidence to the contrary. Therefore, these projects are screened out from completing a VMT analysis based on project size.

- **Screening Criteria 3: Low VMT Area Screening:** OPR guidance states that residential and office projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. A low VMT generating area generally has higher density, a mix of land uses, and provides opportunities for people to walk to nearby uses instead of always driving. The Transportation Analysis Zones (TAZs) contained in the SCAG model can be used to identify the low VMT areas in the City of Beverly Hills.

- **Screening Criteria 4: Transit Priority Area Screening:** Projects located in a Transit Priority Area (TPA) may also be screened out from conducting a VMT analysis because, under CEQA Guidelines Section15064.3 they are presumed to have a less than significant impact absent substantial evidence to the contrary. TPAs are defined in the OPR *Technical Advisory* as a 0.5-mile radius around an existing or planned major transit stop or an existing stop along a high-quality transit corridor (HQTC). A HQTC is defined as a corridor with fixed route bus service frequency of 15 minutes (or less) during peak commute hours. The City of Beverly Hills adopted VMT thresholds to allow screening for TPAs that are located within 0.5 mile of a Metro Rapid bus stop for commercial zones. The presumption that a project in a TPA will have a less than significant impact absent substantial evidence to the contrary may *not* be appropriate if the project:

  - Has a Floor Area Ratio (FAR) of less than 0.75;

  - Includes more parking than is required by the City, unless additional parking is being provided for design feasibility, such as completing the floor of a subterranean or structured parking facility, or if additional parking is located within the project site to serve adjacent uses; or

  - Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the City).

4.9.3.2.3.2 VMT Analysis for Cumulative Conditions

For cumulative conditions, OPR states that a project that is below the VMT impact thresholds and does not have a VMT impact under baseline conditions would also not have a cumulative impact as long as it is aligned with long-term state environmental goals, such as reducing GHG emissions, and relevant plans, such as the SCAG RTP/SCS. The City of Beverly Hills adopted the following cumulative threshold for VMT impacts:

1. A significant impact would occur if the project causes VMT within the City to be higher than the no project alternative under cumulative conditions.

2. A significant impact would occur if the project is determined to be inconsistent with the RTP/SCS.

4.9.3.3 Project Design Features

The Project would incorporate the following project design features with regard to transportation:

Project Design Feature TRA-PDF-1: The Project proposes an amendment to the Master Plan of Streets to: (1) eliminate an existing surface right of way segment and relocate this segment in the Project Site area for public alley purposes; (2) dedicate additional surface right of way for public sidewalk purposes along South Santa Monica Boulevard to widen the sidewalk; and (3) allow the existing public roadways along North Rodeo Drive and South Santa Monica Boulevard to remain in their current locations.

Project Design Feature TRA-PDF-2: The Specific Plan requires that free transit passes be made available to Hotel and Club employees who use transit to travel to and from the Project Site to work.

4.9.3.4 Analysis of Project Impacts

Threshold (a): Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

4.9.3.4.1 Impact Analysis

The following plans apply to the Project: the City of Beverly Hills General Plan, the City's Draft Complete Streets Plan, the City's Master Plan of Streets, and the LA Metro First Last Mile Strategic Plan. The Project's potential to conflict with these programs, plans, ordinances, and policies is analyzed below.

4.9.3.4.1.1 Construction Impacts

As discussed in the Transportation Impact Report, the report analyzed the potential for construction-related transportation impacts to occur as a result of haul trucks traveling to and from the Project Site, the transportation/delivery of materials and equipment, construction worker traffic, and construction worker parking.

4.9.3.4.1.1.1 Haul Truck Traffic

Hauling activity is expected to occur between the Project Site and off-site staging and/or logistics areas. Between the hours of 7:00 P.M. to 10:00 P.M., the designated outbound (leaving the Project Site) haul route is anticipated to be from the Project Site to eastbound South Santa Monica Boulevard to Burton Way to San Vicente Boulevard to southbound La Cienega Boulevard to Interstate 10. The reverse of this route would be used for inbound truck traffic from 7:00 P.M. to 10:00 P.M. Between the hours of 10:00 P.M. to 7:30 A.M., the designated outbound haul route is anticipated to be from the Project Site to southbound Beverly Drive to eastbound Wilshire Boulevard to southbound La Cienega Boulevard. Between the hours of 10:00 P.M. to 7:30 A.M., the inbound haul route would be from Interstate 10 to northbound La Cienega Boulevard to westbound Wilshire Boulevard to northbound North Camden Drive to eastbound South Santa Monica Boulevard to the Project Site.

As discussed in the Transportation Impact Report, haul truck traffic could impact the adjacent roadway network as follows:

- The roadways designated as the truck routes for the Project are already some of the most congested in the City of Beverly Hills and the City of Los Angeles.
- There is no guarantee that truck traffic would not deviate from the designated routes based on traffic conditions during any given period and impact other roadways when traveling to and from the Project Site.
- The number of trucks required to access the Project Site during the excavation process would be approximately 60 trucks per day for a 21-week period.

4.9.3.4.1.1.2 Delivery and Staging of Materials and Equipment

Another source of construction traffic would derive from the transportation of materials and equipment to the Project Site. One example would be concrete, of which substantial quantities would be required for the subterranean parking garage and the buildings on-site. Other materials could include plumbing supplies, electrical fixtures, and items used in furnishing the hotel and other uses. These materials would have to be delivered to the Project Site and stored on-site as well. These deliveries would occur

through variously sized vehicles including small delivery trucks to cement mixer trucks, and possible 18-wheel trucks.

Additionally, heavy construction equipment would have to be delivered to the Project Site. This equipment could include cranes, bulldozers, excavators, and other large items of machinery. Most of the heavy equipment would be transported to the Project Site on large trucks such as 18-wheelers or other similar sized vehicles, and the heavy equipment would remain on-site until it is no longer needed.

The influx of this construction-related material and equipment could create impacts on the adjacent roadway network based on the following considerations:

- There may be intermittent periods when large numbers of material deliveries are required such as when concrete trucks would be needed for the parking garage and the buildings.
- Some of the materials and equipment could require the use of large trucks (18-wheelers), which can create additional congestion on the adjacent roadways.
- Delivery vehicles may need to park temporarily on adjacent roadways such as Santa Monica Boulevard, Beverly Drive, and Rodeo Drive as they deliver their items.

4.9.3.4.1.1.3 Worker Traffic

As provided in the Transportation Impact Report, the maximum number of workers on the Project Site would be 500 per day. The number of vehicles associated with these workers was estimated assuming that each worker would drive to and from the Project Site daily at least once (two daily person trips per worker) and assuming that a small percentage of the workers may carpool or travel together (based on regional auto occupancy factor of 1.25 persons per vehicle).

Construction workers would travel to/from the Project Site in the morning (7:00 A.M. to 9:00 A.M.) and afternoon peak hours (4:00 P.M. to 6:00 A.M.). They are not all likely to arrive at the construction site within the same hour nor would they leave the site at the same time. It was assumed that no more than half of the drivers would arrive during a single peak hour either in the morning or afternoon as many construction workers arrive at the site outside of the peak hours, arriving prior to 7:00 A.M. and leaving the site before 4:00 P.M. Using the maximum number of workers (500), the number of worker trips would be 800 daily trips with 200 peak hour trips (one hour in the morning and afternoon peak period).

4.9.3.4.1.1.4 Worker Parking

During the initial construction period (prior to completion of the proposed subterranean parking structure), construction workers would utilize a mixture of public long-term and private parking facilities in close proximity to the Project Site. Once construction of the on-site subterranean parking structure is sufficiently progressed, construction employees would utilize on-site spaces as they become available, greatly reducing the off-site construction parking demand. The need to park workers off-site could result in a specific traffic related impact because it could lead to workers parking in adjacent areas.

4.9.3.4.1.1.5 Summary of Construction Impacts

As detailed above and in the Transportation Impact Report, potential construction-related transportation impacts could result during construction of the Project associated with haul truck traffic, the delivery and staging of construction materials and equipment, construction worker traffic, and construction worker parking. **As such, construction activities associated with the Project could potentially conflict with a program, plan, ordinance or policy addressing the circulation system, and impacts could be potentially significant.**

As discussed below, the Project would implement Mitigation Measures TRA-MM-1 through TRA-MM-3, which would include implementation of a Construction Traffic Management Plan, Construction Worker Parking Plan, and coordination with the City regarding temporary roadway closures, major deliveries, off-site staging, and loading and unloading areas. As concluded in the Transportation Impact Report, with implementation of these mitigation measures, potential construction-related transportation impacts would be reduced to a less than significant level.

4.9.3.4.1.2 Operational Impacts

4.9.3.4.1.2.1 City of Beverly Hills General Plan

As discussed in detail in Section 4.7, Land Use and Planning, of this Final EIR, the Project would not conflict with the relevant goals and policies of the Circulation Element of the Beverly Hills General Plan. Specifically, the Project would not conflict with the City's Goal CIR-1 and Goal CIR-2 to provide a safe and efficient roadway circulation system within the City and to provide the development of a safe, comprehensive, and integrated transit system that serves as an essential component of a multi-modal mobility system within the City as the Project would provide bicycle parking spaces, including charging facilities for e-bicycles, as well as employee lockers and showers, and would be located in an area well served by a variety of public transit options, including local and regional bus lines. In addition, the Project would not conflict with Goal CIR-7 regarding a safe and

comfortable pedestrian environment that results in walking as a desirable travel choice, particularly for short trips, within the City. The proposed driveways to the valet motor court and the relocated alley would be designed to limit potential impediments to visibility and incorporate pedestrian warning systems, if and to the extent necessary. The Project would also provide a direct and safe path of travel with minimal obstructions to pedestrian movement within the Project Site. The Project would also improve the streetscape and pedestrian environment by including a publicly-accessible 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. A landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard would also be provided as part of the Project. In addition, as part of the Project, additional surface right-of-way for public sidewalk purposes would be dedicated along South Santa Monica Boulevard, further enhancing the surrounding pedestrian facilities. Overall, as detailed in Section 4.7, Land Use and Planning, of this Final EIR, the Project would not conflict with the applicable goals and policies of the General Plan addressing the circulation system.

4.9.3.4.1.2.2 Complete Streets Plan and Streetscape Planning in Beverly Hills

As discussed above, the Complete Streets Plan creates a blueprint for transportation improvements that balance the needs of all road users: bicyclists, pedestrians, transit riders, and motorists. The goal of the Complete Streets Plan is to provide more options for people to choose the mode that best works for their trip type, and a network of streets where individual modes will be prioritized. The Complete Streets Plan identifies North Santa Monica Boulevard, Wilshire Boulevard, Burton Way, Olympic Boulevard, and Beverly Drive as the City's proposed Transit Enhanced Network. The Complete Streets Plan identifies a series of bicycle improvements that will help facilitate access to the Metro D (formerly Purple) Line Rodeo Station, including a proposal for a Class IV bicycle lane along North Beverly Drive, and pedestrian corridors and ADA-compliant pedestrian connections to enhance the overall pedestrian experience.

The Project Site is located along Beverly Drive and is within the proposed Transit Enhanced Network. The Project would provide bicycle parking spaces, including charging facilities for e-bicycles, as well as employee lockers and showers, and would be located in an area well served by a variety of public transit options, including local and regional bus lines. In particular, Metro serves several transit stops along North and South Santa Monica Boulevard and North Beverly Drive within approximately 0.25 mile of the Project Site. The Project Site is also located approximately 0.4 mile walking distance from the Metro D (formerly Purple) Line Rodeo Station currently under construction along Wilshire Boulevard generally between Cañon Drive and Rodeo Drive. The Project would also support a safe and comfortable pedestrian environment. Specifically, as part of the Project, additional surface right-of-way for public sidewalk purposes would be dedicated along South Santa Monica Boulevard, further enhancing the surrounding pedestrian facilities. The proposed

driveways to the valet motor court and the relocated alley would also be designed to limit potential impediments to visibility and incorporate pedestrian warning systems, if and to the extent necessary. Furthermore, the Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within the Project Site. The Project would also improve the streetscape by including a publicly-accessible 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. A landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard would also be provided. As such, the Project would not conflict with the Complete Streets Plan.

4.9.3.4.1.2.3 Beverly Hills Master Plan of Streets

As discussed above, the Beverly Hills Master Plan of Streets (Master Plan of Streets) is the City's planned roadway network. The existing Master Plan of Streets currently identifies that the South Santa Monica Boulevard roadway will be widened and the curb radius on the southeast corner of the Rodeo Drive/South Santa Monica Boulevard intersection will be modified. The Project proposes an amendment to the Master Plan of Streets to: (1) eliminate an existing surface right of way segment and relocate this segment in the Project Site area for public alley purposes; (2) dedicate additional surface right of way for public sidewalk purposes along South Santa Monica Boulevard to widen the sidewalk; and (3) allow the existing public roadways along North Rodeo Drive and South Santa Monica Boulevard to remain as currently configured. With approval of the proposed Master Plan of Streets amendments listed above, the Project would not conflict with the Master Plan of Streets.

4.9.3.4.1.2.4 LA Metro First Last Mile Strategic Plan

As discussed above, the LA Metro First Last Mile Strategic Plan (First Last Mile Plan) outlines an approach for identifying barriers and planning for/implementing improvements for connecting transit services to nearby trip origins (e.g., an individuals' home) and destinations (e.g., an individuals' place of employment). Examples of first/last mile improvements include but are not limited to: pedestrian and bicycle infrastructure, signage and wayfinding, and shared use services (e.g., car share). As previously described, the Project would provide bicycle parking spaces, including charging facilities for e-bicycles, as well as lockers and showers for employees to encourage bicycle commuting and the Project would be located in an area well served by a variety of public transit options, including local and regional bus lines. In particular, Metro serves several transit stops along North and South Santa Monica Boulevard and North Beverly Drive in the vicinity of the Project Site. The Project Site is also located approximately 0.4 mile walking distance from the Metro D (formerly Purple) Line Rodeo Station currently under construction along Wilshire Boulevard generally between Cañon Drive and Rodeo Drive.

Hotel and club employees who commute by transit will be provided free transit passes. The Project would also support a safe and comfortable pedestrian environment. Specifically, as part of the Project, additional surface right-of-way for public sidewalk purposes would be dedicated along South Santa Monica Boulevard, further enhancing the surrounding pedestrian facilities. The proposed driveways to the valet motor court and the relocated alley would also be designed to limit potential impediments to visibility and incorporate pedestrian warning systems, if and to the extent necessary. Furthermore, the Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within the Project Site. The Project would also improve the streetscape by including an approximately 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, and a landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard. As such, the Project would not conflict with the First Last Mile Plan.

4.9.3.4.1.2.5 Other Plans and Policies

As discussed in detail in Section 4.7, Land Use and Planning, of this Final EIR, the Project would also not conflict with SCAG RTP/SCS policies related to encouraging pedestrian activity and reducing VMT. Specifically, the Project would encourage the use of alternative modes of transportation (i.e., pedestrian, biking, public transit) and reduce dependency on single-occupancy vehicles.

Based on the above, operation of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

4.9.3.4.2 Mitigation Measures

As discussed above, potential traffic-related impacts could occur from construction of the Project. Therefore, the following mitigation measures are provided to reduce potentially significant construction-related transportation impacts to a less than significant level:

Mitigation Measure TRA-MM-1: A Construction Traffic Management Plan shall be prepared prior to the commencement of construction activities. The Construction Traffic Management Plan shall be implemented during construction to accomplish the following:

- Maintain existing access for land uses in proximity of the Project Site during Project construction.

- Schedule deliveries and pick-ups of construction materials to non-peak travel periods, to the maximum extent feasible.
- Coordinate deliveries and pick-ups to reduce the potential of trucks waiting to load or unload for protracted periods of time.
- Minimize obstruction of through traffic lanes on ~~Wilshire Boulevard~~ North Beverly Drive and South Santa Monica Boulevard.
- Construction equipment traffic from the contractors shall be controlled by flagman.
- Identify designated transport routes for heavy trucks (in addition to haul trucks) to be used over the duration of the proposed Project.
- Schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on the surrounding streets.
- Establish requirements for loading/unloading and storage of materials on the Project Site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses.
- Coordinate with adjacent businesses and emergency service providers to ensure adequate access exists to the Project Site and neighboring businesses.

Mitigation Measure TRA-MM-2: A Construction Workers Parking Plan identifying parking locations for construction workers shall be submitted to the City prior to the commencement of construction activities. To the maximum extent feasible, all worker parking shall be accommodated on the Project Site. During phases when construction worker parking cannot be accommodated on the Project Site, the Construction Workers Parking Plan shall identify alternate parking locations for construction workers and the method of transportation to and from the Project Site for approval by the City 30 days prior to commencement of construction. The Construction Workers Parking Plan must include appropriate measures to ensure that the parking location requirements for construction workers would be strictly enforced. These include but are not limited to the following measures:

- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations. This information would clearly state that no parking is permitted on residential streets north of Wilshire Boulevard or in public parking structures.

- No construction worker parking shall be permitted within 500 feet of the nearest point of the Project Site except within designated areas. The contractor shall be responsible for informing subcontractors and construction workers of this requirement, and if necessary, for hiring a security guard to enforce these parking provisions. Contractor shall be responsible for all costs associated with enforcement of this mitigation measure.
- In lieu of the above, the Project developer/construction contractor has the option of phasing demolition and construction activities such that all construction worker parking can be accommodated on the Project Site throughout the entire duration of demolition and construction activities.

Mitigation Measure TRA-MM-3: The developer for the Project shall coordinate with the City of Beverly Hills regarding the following:

- All temporary roadway closures shall be coordinated to limit overlap of roadway closures.
- All major deliveries shall be coordinated to limit the occurrence of simultaneous deliveries to the Project and other major construction projects. The Project applicant shall ensure that deliveries of items such as concrete and other high-volume items shall be reported to the City's major delivery schedule and reporting shall be incorporated as a requirement into the Construction Traffic Management Plan to ensure that simultaneous deliveries are avoided when feasible.
- The Project applicant shall coordinate with the City regarding the loading and unloading of delivery vehicles. Any off-site staging areas for delivery vehicles shall be consolidated and shared with the other major construction projects where feasible.
- The Project applicant or their representative shall meet on a regular basis during construction with the City to address any outstanding issues related to construction traffic, deliveries, and worker parking.
- If construction on other major projects in the vicinity is occurring simultaneously with this Project, the City can require as part of the Construction Traffic Management Plan that the applicant meet with other applicants and the City to address construction traffic, deliveries, and worker parking.

4.9.3.4.3 Level of Significance After Mitigation

With implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, potential impacts related to conflicts with City programs, plans, ordinances, and policies addressing the circulation system during construction of the Project would be reduced to

less than significant levels. Project-level impacts related to conflicts with City programs, plans, ordinances, and policies addressing the circulation system during operation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level during operation of the Project would remain less than significant.

Threshold (b): Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b)?

4.9.3.4.4 Impact Analysis

As discussed above, based on the OPR Technical Advisory, the City of Beverly Hills adopted four screening criteria that the City may use to identify if a proposed project is expected to cause a less-than-significant impact without conducting a detailed study: (1) project size; (2) locally serving retail; (3) project location in a low VMT area; and (4) project accessibility to transit. The four screening criteria are detailed below and applied to the Project to determine if the Project has the potential to result in a VMT impact. Once a project component qualifies under one of the screening criteria, that component is screened out from further consideration. Each of the four criterion and their applicability to the Project are discussed further below.

4.9.3.4.4.1 Screening Criterion 1

Land use projects that generate less than 110 daily trips are presumed to have less than significant VMT impacts absent substantial evidence to the contrary. Therefore, these projects are screened out from completing a VMT analysis based on project size. When compared to the existing land uses on the Project Site, the Project would generate approximately 2,360 net new vehicle trips. This daily trip generation exceeds the number of daily trips that is applicable for project size screening. Therefore, the Project does not meet this screening criteria.

4.9.3.4.4.2 Screening Criterion 2

As discussed above, land use projects that have local-serving retail uses, defined as commercial projects with retail uses less than 50,000 square feet, are presumed to have less than significant VMT impacts absent substantial evidence to the contrary. The Project includes 24,976 square feet (with up to 25,000 square feet allowed in the Specific Plan) of retail space, as compared to the 27,160 square feet of existing retail uses on-site, which would result in a decrease in retail uses of approximately 2,160 square feet when considering the Specific Plan maximum. While the Project would result in a net decrease in the amount of retail uses, nevertheless the amount of new retail space would meet the screening criteria for locally serving retail uses and the screening criteria is met, which

means that the retail component of the Project is presumed to have a less than significant VMT impact and can be screened out from further VMT analysis.

4.9.3.4.4.3 Screening Criterion 3

As discussed above, OPR guidance states that residential and office projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. A low VMT generating area generally has higher density, a mix of land uses, and provides opportunities for people to walk to nearby uses instead of always driving. Since the Project contains neither residential nor office uses, this screening criteria is not applicable to the Project.

4.9.3.4.4.4 Screening Criterion 4

As discussed above, projects located in a Transit Priority Area (TPA) may be screened out from conducting a VMT analysis because they are presumed to have a less than significant impact absent substantial evidence to the contrary. TPAs are defined in the OPR *Technical Advisory* as a 0.5-mile radius around an existing or planned major transit stop or an existing stop along a high-quality transit corridor (HQTC). A HQTC is defined as a corridor with fixed route bus service frequency of 15 minutes (or less) during peak commute hours.

Based on existing transit service in Beverly Hills, the Project Site is located in a commercial zone within a TPA and is less than 0.5 mile from six Metro Rapid bus stops, including the Santa Monica/Crescent eastbound stop, the Santa Monica/Cañon westbound stop, and the Santa Monica/Wilshire bi-directional stop of Metro Rapid Line 704, as well as the Wilshire/Santa Monica bi-directional stop of Metro Rapid Line 720, all of which have a service frequency of less than 15 minutes during peak commute hours. In addition, the Project Site will be 0.4 mile walking distance from the recently approved North Portal entrance to the Metro D (formerly Purple) Line Rodeo Station. The Project's Floor Area Ratio (FAR) is 4.03 and meets the 0.75 FAR minimum requirement. As detailed in Section 4.7, Land Use and Planning, of this Final EIR, based on the Parking Study[11] conducted for the Project and included in Appendix H.3 of this Final EIR ~~that applies the Urban Land Institute's shared parking demand model~~, the proposed supply of ~~178~~185 parking spaces would meet the projected peak demand for the Project and comply with the applicable parking standards as set forth in the Specific Plan~~, although it would also provide less parking than required by the City's Municipal Code and Parking Standard~~. The Project Site is designated as Mixed Residential and Commercial in the SCAG RTP/SCS, and therefore,

[11] *Its is noted that the Parking Study included in the Draft EIR has been updated in response to comments on the Draft EIR. The updated Parking Study is included in Appendix H.3 of this Final EIR.*

the proposed land uses are consistent with the RTP/SCS. Based on this information, the Project is presumed to have a less than significant VMT impact and can be screened out from further VMT analysis.

In summary, the retail component of the Project meets the City's adopted Screening Criteria 2, and the Project in its entirety meets the City's adopted Screening Criteria 4, and therefore the Project will not have a VMT impact pursuant to CEQA Guidelines 15064.3. **As concluded in the Transportation Impact Report, based on the screening criteria, the Project would have a less than significant VMT impact and is screened out from further VMT analysis.**

4.9.3.4.5 Mitigation Measures

Project-level impacts with respect to conflict with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant. Therefore, no mitigation measures are required.

4.9.3.4.6 Level of Significance After Mitigation

Project-level impacts with respect to conflict with CEQA Guidelines Section 15064.3, subdivision (b) were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant.

4.9.4 Cumulative Impacts

4.9.4.1 Impact Analysis

4.9.4.1.1 Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

As provided in Section 3.0, Environmental Setting, of this Final EIR, a total of 47 potential related development projects have been identified in the vicinity of the Project Site for inclusion in the cumulative impact analysis regarding transportation. The related projects comprise a variety of uses, including apartments, condominiums, restaurants, office, and retail uses, as well as mixed-use developments incorporating some or all of these elements.

4.9.4.1.1.1 Construction

As illustrated in Figure 3.0-1 in Section 3.0, Environmental Setting, of this Final EIR, the potential related development projects include related projects in the City of Beverly

Hills, the City of Los Angeles, and the City of West Hollywood. As such, not all related projects would be concentrated within a specific area. Rather, these projects would be dispersed within the transportation study area and would use various haul routes. However, there is a potential for some of the related projects within the City of Beverly Hills and those in close proximity to the Project Site in particular such as Related Project Nos. 11, 12, and 13 to overlap with the construction of the Project. In addition, there are ongoing construction activities in the vicinity related to the construction of Metro's D (formerly Purple) Line Extension and the North Portal for the Metro D Line Rodeo Station. As identified in the Transportation Impact Report, potential impacts from the simultaneous construction of the Project and potential related projects could include:

- Simultaneous arrival and departure of haul trucks: The increased volume of haul truck traffic and number of trucks entering/exiting roadways surrounding the various construction sites could result in congestion on shared roadways.

- Simultaneous arrival and departure of delivery trucks: Equipment and supply delivery vehicles could impact adjacent roadways by creating additional congestion. There may also be temporary queuing of these delivery vehicles if large numbers of vehicles arrive or depart at once.

Overall, as concluded in the Transportation Impact Report, simultaneous construction activities in the vicinity of the Project Site could result in significant, although temporary, traffic impacts resulting from haul truck traffic and the simultaneous delivery of materials/equipment. For this reason, construction associated with the Project and other related projects could result in a potentially significant cumulative traffic impacts. However, as with the Project, other related projects would be reviewed by the City, would conduct their own environmental review and mitigation measures requiring City coordination would be imposed, as applicable. During this review process, potential impacts would be evaluated, and mitigation identified to address construction-related transportation impacts, if necessary. In addition, construction activities would be coordinated with the City and the City would be notified of any proposed lane closures such as proposed by the Project in Mitigation Measure TRA-MM-3 above. **Through the City's review process and with implementation of the Project's mitigation measures, cumulative traffic impacts during construction would be less than significant.**

4.9.4.1.1.2 Operation

The related projects primarily propose high-density residential, office, and commercial uses in an area with good transit connectivity, reducing dependence on automobiles and encouraging more active travel modes. In addition, some related projects would be required to implement a Transportation Demand Management (TDM) program. Thus, as with the Project, the related projects would also not conflict with the relevant goals

and policies of the Circulation Element. Each related project would also include the required number of vehicle and bicycle parking spaces in accordance with City requirements. Accordingly, no significant cumulative impacts are anticipated to which both the Project and other nearby related projects would contribute in regard to City transportation policies or standards and support of multimodal transportation options. **Therefore, operational Project impacts with respect to conflicts with a program, plan, ordinance, or policy addressing the circulation system would not be cumulatively considerable, and cumulative impacts would be less than significant.**

4.9.4.1.2 Vehicle Miles Traveled

For cumulative conditions, OPR states that a project that is below the VMT impact thresholds and does not have a VMT impact under baseline conditions would also not have a cumulative impact as long as it is aligned with long-term state environmental goals, such as reducing GHG emissions, and relevant plans, such as the SCAG RTP/SCS.[12] The City of Beverly Hills adopted the following cumulative threshold for VMT impacts: (1) a significant impact would occur if a project causes VMT within the City to be higher than the no project alternative under cumulative conditions; and (2) a significant impact would occur if a project is determined to be inconsistent with the RTP/SCS.

As evaluated above, the Project meets Screening Criteria 2 and Screening Criteria 4 and would result in a less than significant VMT impact. As discussed in the Transportation Impact Report, for evaluating potential VMT impacts under cumulative conditions, the future horizon year forecasted in the SCAG RTP/SCS model is considered to be the no project condition. Since the growth included in the SCAG model already reflects the development that is proposed to occur with the Project, the Project would not increase VMT in comparison to the cumulative no project condition and would not have a cumulative VMT impact. Additionally, the Project is in an infill location with convenient access to public transit and opportunities for walking and biking, which would result in a reduction of vehicle trips, VMT, and GHG emissions. Specifically, the Project Site is located in a transit-rich neighborhood serviced by Metro local and rapid bus lines. In addition, the Project Site's proximity to a variety of commercial uses and services would encourage guests and employees of the Project Site to walk to nearby destinations to meet their shopping needs, thereby reducing VMT and GHG emissions. Also, as detailed in Section 4.7, Land Use and Planning, of this Final EIR, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for

[12] *Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, 2018, p. 6.*

people and goods and support healthy communities by developing a hotel with commercial retail, and restaurant uses on a Project Site within a designated HQTC that is well served by public transit. As previously discussed, the Project would provide 18 bicycle parking spaces and employees would have access to lockers and showers to encourage bicycle commuting, and free transit passes will be made available to hotel and club employees who use transit to travel to and from the Project Site to work. The Project would also be designed with LEED ~~Silver~~ Gold or equivalent green building standards and would feature EV charging station parking spaces. As such, the Project would support the reduction in greenhouse gas emissions, encourage the use of alternative modes of transportation (i.e., walking, biking, public transit) and reduce dependency on single-occupancy vehicles. **Therefore, Project impacts with respect to VMT would not be cumulatively considerable, and cumulative impacts would be less than significant.**

4.9.4.2 Mitigation Measures

Cumulative impacts related to transportation would be less than significant. Therefore, no mitigation measures are required.

4.9.4.3 Level of Significance After Mitigation

Cumulative impacts related to transportation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant.

4.9.5 Local Transportation Assessment Guidelines Site Access Analysis

The City of Beverly Hills developed Local Transportation Assessment Guidelines at the time it adopted its new VMT-focused transportation thresholds in October 2019. The City's Local Transportation Assessment Guidelines include analysis of site access. As such, an evaluation of queueing at project access points was also performed as part of the Local Transportation Assessment prepared for the Project, included in Appendix H of this Final EIR. As evaluated in the Local Transportation Assessment, for the primary Project Site access to the motorcourt from South Santa Monica Boulevard, the westbound left-turn from South Santa Monica Boulevard is projected to have a demand of 31 vehicles in the A.M. peak hour and 88 vehicles in the P.M. peak hour. Under Future plus Project conditions, the projected 95th percentile queue is approximately 4 vehicles in the A.M. peak hour and the upstream intersection is blocked 6 percent of the time. In the P.M. peak hour, the projected 95th percentile queue is approximately 3 vehicles and the upstream intersection is blocked 11 percent of the time. These queues extend to the upstream intersection because the existing configuration of South Santa Monica Boulevard does not provide storage for westbound left turns into the Project Site, and therefore, any queued

vehicles would block westbound through traffic. To provide a turn lane into the motor court, the Local Transportation Assessment states that the following could be implemented:

- Remove one parking spot from the north side of South Santa Monica Boulevard in order to extend the painted median to the proposed motorcourt entrance. This would provide a separate storage lane for westbound left-turning vehicles such that westbound through traffic would not be impeded by vehicles waiting to turn. It is noted that the parking spot that would be removed under this alternative site access option was not in operation as of February 2021, when it was observed that a bag had been placed over the meter. This improvement would result in 95th percentile queues of only approximately 1 vehicle, and the upstream intersection would be blocked 2 percent of the time during both peak hours.

For the secondary Project Site access to the relocated alley, the northbound left-turn from North Beverly Drive is projected to have a demand of 14 vehicles in the A.M. peak hour and 9 vehicles in the P.M. peak hour. Under cumulative plus Project conditions, the projected 95th percentile queue is only 1 vehicle under both peak hours, indicating that the new alley location is not expected to cause operational issues along North Beverly Drive due to turning vehicles queueing.