4.0 Environmental Impact Analysis

4.7 Land Use and Planning

4.7.1 Introduction

This section of the Final EIR analyzes the Project's potential impacts with regard to conflicts with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The Project's potential impact related to the potential physical division of an established community, also addressed under Land Use and Planning, was fully evaluated in the Initial Study prepared for the Project, included in Appendix A of this Final EIR and was determined to be less than significant.

4.7.2 Environmental Setting

4.7.2.1 Regulatory Framework

4.7.2.1.1 Local

The City of Beverly Hills (City) regulates land use through its General Plan, specific plans, and Municipal Code. The Beverly Hills Municipal Code (BHMC) governs land use through specific development and design standards and building and safety codes. The City General Plan and BHMC are described below. There are no specific plans applicable to the Project Site.

4.7.2.1.1.1 City of Beverly Hills General Plan

State law requires that every city and county prepare and adopt a general plan, which is a comprehensive long-term document that provides principles, policies, and objectives to guide future development.

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 City's General Plan elements applicable to the Project are summarized below, while specific goals and policies that apply to the Project are discussed under the Analysis of Project Impacts subsection below. The General Plan elements applicable to the Project include land use, historic preservation, economic stability, open space, circulation, conservation, noise, and safety.

4.7.2.1.1.1.1 Beverly Hills General Plan Land Use Element

As set forth in the Land Use Element of the City's General Plan, the underlying objective of the Land Use Element is to maintain and enhance those qualities which contribute to the long-term stability and desirability of residential and nonresidential areas of Beverly Hills. As provided in the Land Use Element, the emphasis of the Land Use Element is on areas likely to change with an associated goal to ensure that if change occurs, it will be in a manner consistent with the quality and objectives of the community. Additionally, an overarching objective of the Land Use Element is to resolve transitional conflicts which occur between abrupt changes in land use or intensity of use within Beverly Hills or between Beverly Hills and neighboring jurisdictions. Generally, the goals and policies of this element are intended to maintain the overall land use pattern in the City. Seventeen primary goals and associated policies are identified in the Land Use Element that address such issues as long-term stability, community character, land use distribution and form, and environmental sustainability.

The Project's consistency with the applicable goals and policies set forth in the Land Use Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below.

4.7.2.1.1.1.2 Beverly Hills General Plan Historic Preservation Element

The Historic Preservation Element of the City's General Plan strives to assure that the resources that best represent the City's storied past are well preserved and maintained so that they continue to provide the community with a sense of permanence and foster civic pride and stewardship among its residents and businesses. The Historic Preservation Element identifies known historic resources in the City, describes State and federal laws pertaining to historic resources, and includes policies aimed at preserving known and newly identified resources.

The Project's consistency with the applicable goals and policies set forth in the Historic Preservation Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below.

4.7.2.1.1.1.3 Beverly Hills General Plan Open Space Element

The Open Space Element of the City's General Plan is the principal guide for the maintenance and conservation of natural resources, open space, and recreation and park lands in the City of Beverly Hills and serves two main purposes:

- To guide the City in policy issues concerning the acquisition, control, development, and use of open space, and
- To maintain an inventory of the type, location and use patterns of the City's open space and recreation resources for future planning purposes.

Twelve primary goals and associated policies are identified in the Open Space Element to support the element's primary purposes.

The Project's consistency with the applicable goals and policies set forth in the Open Space Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below.

4.7.2.1.1.1.4 Beverly Hills General Plan Circulation Element

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.[1] Eleven primary goals and associated policies are identified in the Circulation Element that support these objectives of the City.

The Project's consistency with the applicable goals and policies set forth in the Circulation Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below.

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[1] *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 for 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. 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 considers LOS analysis; however, not for determining transportation impacts under CEQA.*

4.7.2.1.1.1.5 Beverly Hills General Plan Conservation Element

The Conservation Element is the principal guide for the conservation and use of natural resources within the City. The City is committed to meeting the future needs of residents and businesses by ensuring high quality of water, wastewater, storm drainage, solid waste, energy, and telecommunications systems. Twenty-four primary goals and associated policies are identified in the Conservation Element to support the element's primary purposes. The Project's consistency with the applicable goals and policies set forth in the Conservation Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below.

4.7.2.1.1.1.6 Beverly Hills General Plan Noise Element

The overarching objective of the Noise Element is to ensure that Beverly Hills residents will be protected from excessive noise. Four primary goals and associated policies are identified therein to provide a framework to achieve compatible land uses and provide baseline noise levels and sources of noise to aide in enforcement of noise controls. The Project's consistency with applicable goals and policies set forth in the Noise Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is analyzed in the impact analysis below.

4.7.2.1.1.1.7 Beverly Hills General Plan Safety Element

The primary purpose of the Safety Element is to reduce the potential risk of death, injuries, property damage, and economic and social dislocation resulting from earthquakes, both urban and wildland fires, terrorism, floods, landslides, public health emergencies, and other natural and man-made disasters. This element specifically addresses fire, flood, geologic and seismic hazards, hazardous materials, noise, and natural and man-made disaster preparedness through seven primary goals and associated policies. Seven primary goals and associated policies are identified in the Safety Element to support the element's primary purposes.

The Project's consistency with the applicable goals and policies set forth in the Safety Element of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in the impact analysis below.

4.7.2.1.1.2 Beverly Hills Municipal Code

The City of Beverly Hills Zoning Code (Chapter 10 of the BHMC) regulates development through zoning designations and development standards, including permitted uses, density and intensity of uses, building height, and other standards for development and activity. As shown in Figure 4.7-1 on page 4.7-5, the entire Project Site is zoned

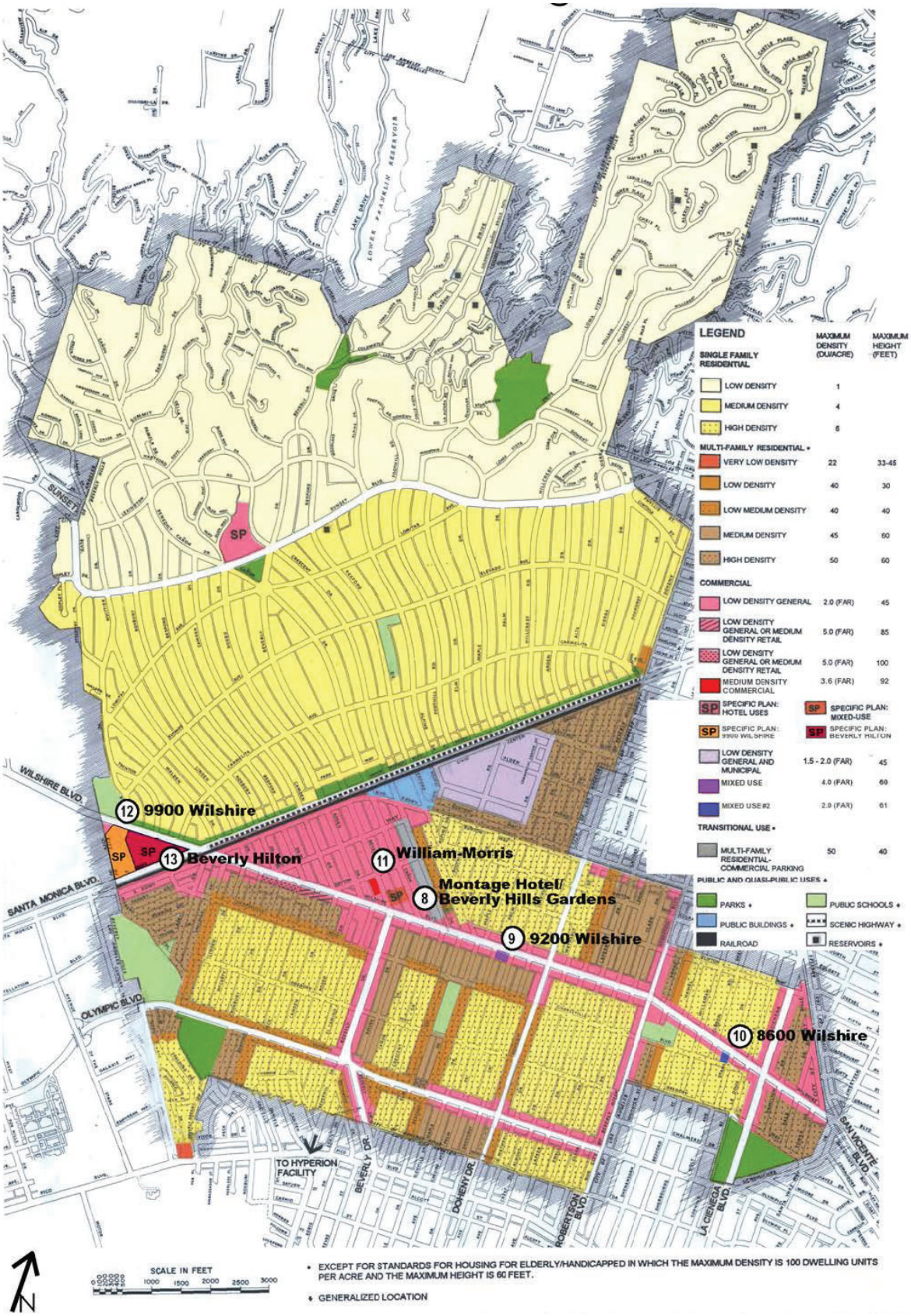

Figure 4.7-1
General Plan Land Use Designations

Source: Community Development Department, April 29, 2008.

as C-3 Commercial and as such is subject to the development standards provided for in BHMC Section 10-3-1601 et seq. The Commercial zone permits a wide array of commercial uses. Specifically, the C-3 Zone permits cafés, carpentry shops, clubhouses, dance academies, libraries, photography galleries studios and shops for conducting wholesale and retail business, among other uses as well as similar uses not listed. Additionally, hotels are a conditionally permitted use in areas zoned C-3 Commercial.

4.7.2.1.2 Regional

Regional land use plans that govern the project area include the Southern California Association of Governments' (SCAG) 2020–2045 Regional Transportation Plan/ Sustainable Communities Strategy (2020–2045 RTP/SCS) and the Air Quality Management Plan (AQMP), which is administered by the South Coast Air Quality Management District (SCAQMD) and addresses the attainment of state and federal ambient air quality standards throughout the South Coast Air Basin. These plans are described below.

4.7.2.1.2.1 Southern California Association of Governments' 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy

SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality.

SCAG's 2020–2045 RTP/SCS, Connect SoCal, adopted on September 3, 2020, presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. 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. As stated in the 2020–2045 RTP/SCS, Senate Bill 375 requires SCAG and other Metropolitan Planning Organizations throughout the state to develop a Sustainable Communities Strategy to reduce per capita greenhouse gas emissions through integrated transportation, land use, housing and environmental planning.[2] Within the 2020–2045 RTP/SCS, the overarching strategy includes plans for "High Quality Transit Areas (HQTA)," "Livable Corridors," and "Neighborhood Mobility Areas" as key features of

[2] *SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, p. 9.*

a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life.[3,4] High-Quality Transit Areas are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[5] Livable Corridors are arterial roadways where local jurisdictions may plan for a combination of the following elements: high-quality bus frequency, higher density residential and employment at key intersections, and increased active transportation through dedicated bikeways. Neighborhood Mobility Areas are areas with roadway networks where Complete Streets and sustainability policies support and encourage replacing single and multi-occupant automobile use with biking, walking, skateboarding, and slow speed electric vehicles. Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas.[6]

The Project's consistency with applicable goals of the 2020–2045 RTP/SCS for the purpose of avoiding or mitigating an environmental effect is analyzed in the impact analysis below.

4.7.2.1.2.2 South Coast Air Quality Management District Air Quality Management Plan

The SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. The SCAQMD is responsible for developing plans for ensuring air quality in the South Coast Air Basin conforms with federal and state air pollution standards. In conjunction with SCAG, the SCAQMD has prepared the 2016 AQMP establishing a comprehensive regional air pollution control program including air pollution control strategies leading to the attainment of state and federal air quality standards in the South Coast Air Basin. Refer to Section 4.1, Air Quality, of this Final EIR for an analysis of the Project's consistency with the AQMP.

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[3] *SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, p. 50-52.*

[4] *SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, Exhibit 3.7, p. 91.*

[5] *SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, p. 51.*

[6] *SCAG 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, p. 51.*

4.7.2.2 Existing Conditions

4.7.2.2.1 Project Site

As discussed in Section 2.0, Project Description, of this Final EIR, the Project Site is currently occupied by commercial and institutional uses comprising approximately 56,787 square feet. Specifically, 456 North Rodeo Drive is developed with a two-story, 6,895-square-foot commercial structure and nine surface parking spaces, 468 North Rodeo Drive is currently developed with a two-story, 20,265-square-foot commercial structure and six surface parking spaces, 461–465 North Beverly Drive is currently developed with a two-story, 23,351-square-foot institutional use and five surface and 45 underground parking spaces, and 449, 451, and 453 North Beverly Drive is developed with a one-story, 6,276-square-foot commercial structure. The Project Site also includes a portion of the existing north-south alley located east of North Rodeo Drive and west of North Beverly Drive. In addition, the Project Site includes subterranean encroachments into the public right-of-way for subsurface utility improvements and parking. Specifically, a request for an encroachment permit is included as part of the Project to allow the subterranean parking area to be located at least 10 feet below grade to extend to the existing curb lines of South Santa Monica Boulevard, Rodeo Drive and Beverly Drive.

Local access to the Project Site is provided by several local streets and arterials, including Santa Monica Boulevard and Wilshire Boulevard. The only existing roadway within the Project Site is a portion of the north-south alley located east of North Rodeo Drive and west of North Beverly Drive. The alley runs north-south through the Project Site and currently is accessible from South Santa Monica Boulevard.

As previously discussed, and as shown in Figure 4.7-1 on page 4.7-5, the Project Site is designated as Low Density General Commercial by the Beverly Hills General Plan. As shown in Figure 4.7-1, the entire Project Site is zoned C-3 (Commercial).

4.7.2.2.2 Surrounding Uses

The Project Site is located within the northern portion of the Beverly Hills Business Triangle. Land uses surrounding the Project Site include a mix of retail uses and restaurants. Specifically, north of the Project Site, across South Santa Monica Boulevard are a collection of small retail stores and restaurants as well as an art gallery. Further to the north are parking structures, North Santa Monica Boulevard, Beverly Gardens Park, and beginning approximately 525 feet from the Project Site, single-family residential neighborhoods. Beverly Gardens Park is included on the City's Local Register of Historic Properties. East of the Project Site, across North Beverly Drive, is the 9-story Bank of America Financial Center building, which primarily contains office space with a Bank of America Branch office and vacant commercial space on the ground floor fronting North

Beverly Drive and South Santa Monica Boulevard. The area immediately south of the Project Site near North Beverly Drive is developed with two 2-story buildings. The building that fronts North Beverly Drive has small retail stores and restaurants on the ground floor and office space on the second floor. The building that fronts the alley contains warehouse space on the ground floor with office space on the second floor. Immediately south of the Project Site fronting North Rodeo Drive is a 3-story building, which contains Ralph Lauren and Giorgio Armani stores on floors 1-2 and a doctor's office and other commercial office tenants on the 3rd floor. To the west of the Project Site, across North Rodeo Drive, are a collection of luxury clothing stores, including Alexander McQueen, Brioni, DSquared2, Zadig & Voltaire, and Saint Laurent. The Writers and Artists Building, a historic building included on the City's Local Register of Historic Properties, is located to the northwest of the Project Site at the intersection of North Rodeo Drive and South Santa Monica Boulevard.

4.7.3 Project Impacts

4.7.3.1 Thresholds of Significance

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

Threshold (a): Physically divide an established community; or

Threshold (b): Conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

With regard to Threshold (a), as evaluated in the Initial Study for the Project, which is included as Appendix A of this Final EIR, the uses proposed by the Project would be consistent with other commercial developments located adjacent to and in the general vicinity of the Project Site. All proposed development would occur within the boundaries of the Project Site and within existing, off-site, utilities rights-of-way. The Project does not propose a freeway or other large infrastructure that would divide the existing surrounding community. As such, as concluded in the Initial Study, the Project would not physically divide an established community. Impacts with respect to Threshold (a) would be less than significant, and no mitigation measures are required.

4.7.3.2 Methodology

The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning and zoning documents that were adopted to mitigate or avoid an environmental effect. CEQA Guidelines Section 15125(d) requires that in describing the environmental setting, an EIR include a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans,

and regional plans. A conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2 "an EIR shall identify and focus on the significant effects of the proposed project on the environment." An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> *An inconsistency between a proposed project and an applicable plan is a legal determination, not a physical impact on the environment. …if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor.*

Analysis of conflicts and consistency with applicable plans is included in this section of the Final EIR. Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies.[7]

4.7.3.3 Project Design Features

No specific project design features are proposed with regard to land use beyond the Project improvements discussed in Section 2.0, Project Description, of this Final EIR.

4.7.3.4 Analysis of Project Impacts

Threshold (b): Would the Project conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

[7] *Office of Planning and Research (OPR), State of California General Plan Guidelines (2017).*

4.7.3.4.1 Impact Analysis

4.7.3.4.1.1 Local Plans

As discussed above, the City of Beverly Hills regulates land use through its General Plan, specific plans, and Municipal Code. The following discussion addresses the Project's consistency with the applicable goals and policies of the General Plan and the requirements of the BHMC.

4.7.3.4.1.1.1 Beverly Hills General Plan

The Project's general consistency with the applicable elements of the City's General Plan and the applicable goals and policies within those elements that were adopted for the purpose of avoiding or mitigating an environmental effect is discussed below and analyzed in detail in Table 4.7-1 on page 4.7-12.

4.7.3.4.1.1.1.1 Beverly Hills General Plan Land Use Element

As discussed above, the Project Site is located within the northern portion of the Beverly Hills Business Triangle and is designated for Low Density General Commercial uses by the Beverly Hills General Plan. The Project would support and would be consistent with the applicable goals and policies of the Land Use Element of the Beverly Hills General Plan. Specifically, as analyzed in detail in Table 4.7-1, the Project would not conflict with the City's many goals and policies regarding maintaining and enhancing the character and scale of the City's neighborhoods. In particular, the uses proposed as part of the Project would be consistent with other commercial uses in the vicinity of the Project Site. The Project has also been designed to respect the scale of the surrounding uses by locating the lower heights of the building along the North Rodeo Drive frontage, Beverly Hills' premier shopping street, and at the intersection of North Rodeo Drive with Santa Monica Boulevard. Taller building heights would be placed along Santa Monica Boulevard (up to six stories, 78.5 feet in height) and North Beverly Drive (up to nine stories, 115 feet in height), transitioning to a similar height as the existing building located to the east across North Beverly Drive (the 110-foot-tall Bank of America building).

In addition, the Project Site is in an area well served by a variety of public transit options, including local and regional bus lines within approximately a ¼ mile of the Project Site and the Metro D (formerly Purple) Line Rodeo Station currently under construction approximately 0.4 mile walking distance from the Project Site that could be used by employees and visitors of the Project, thereby reducing vehicular use. Furthermore, the Project would enhance pedestrian activity by siting commercial uses on the ground level, providing visual access for pedestrians to a large fine art mural installed at the back lobby wall, including large openings at the ground floor restaurant to provide indoor/outdoor

Table 4.7-1
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
Land Use Element	
Goal LU-1: Long Term Stability. In general, each of the land use issues is directed toward the enhancement and maintenance of the long-term durability and stability of the community. A plan which would accomplish this must recognize the unique qualities of the community, and with it, the factors which enhance the uniqueness as well as the factors which jeopardize them. Beverly Hills is fortunate in that it is able to serve a variety of residential and commercial demands in a manner and combination which is difficult to duplicate elsewhere in the Los Angeles area. Consequently, as long as Beverly Hills is able to provide an alternative not available elsewhere, it will endure. The characteristics which contribute to the special opportunities available in Beverly Hills include: The City's key location with respect to major professional and managerial centers of employment. The wide range of high quality services, such as police, fire and education. The quality of the physical environment, such as its extensive network of trees and landscaping, relatively unmarred by overhead utilities. The scale of the community, which fosters a sense of place and identity rather than a sense of anonymity. The pride of its residents and businesses, as reflected in many ways, such as the architecture, landscaping and overall concern for the welfare of the community, as evidenced in the wide-ranging commitments to participation in community affairs. The character of its business community, as reflected in the quality and diversity of its stores, hotels, restaurants and offices The exceptional qualities of its housing stock which offers a variety of housing and neighborhoods rarely found elsewhere. These characteristics which have been so vital to the community's success in the past form the basis for its planning objectives in the	**No Conflict.** The Project Site is located within the northern portion of the Beverly Hills Business Triangle, thereby supporting the scale of the community by not developing beyond it, which fosters a sense of place and identity as described by LU-1, and regeneration of the City within the general framework of the existing scale of the surrounding development, as promoted by Policy LU-1.1. The quality and diversity of uses proposed by the Project would contribute to the unique character of Beverly Hills and the long-term competitiveness and stability of the Business Triangle. Additionally, although the Project Site would exceed existing density and height limits for the low density commercial zone in which it is located, the Project would establish consistency through 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. The intent of the Specific Plan is to provide a concise development plan for the Project Site and to optimize the use of the Project Site in a manner that capitalizes on the Project Site's location at the northern entrance to the City's Business Triangle.

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
future. Accordingly, those objectives which can be achieved through the General Plan and the Land Use Element are reflected in the accompanying plan map. Aside from the issues of change which face the community as new development occurs and new demands are placed upon the City, it is equally important to recognize that the process of maintaining the quality of life is a dynamic one. The City's programs must be able to recognize and respond to the problems which typically affect Cities, such as deterioration of its older housing stock, obsolescence or loss of competitive ability of commercial areas, rising costs and overburdened services and facilities, and increased problems of accessibility and parking. Through its policies and programs, therefore, the City must provide the opportunity and incentives, within the guidelines of the City's objectives, which will encourage private investment in the regeneration and redevelopment process. Policy LU-1.1: The Scale of the City. Although implicit in any discussion of the future of the City, the importance of scale must be underscored. As long as the City is able to regenerate itself within the general framework of the existing scale, it will offer an environment which is becoming increasingly unique in the Westside.	
Goal LU-2: Community Character and Quality. A built environment that is distinguished by its high level of site planning, architecture, landscape design, and sensitivity to its natural setting and history. **Policy LU-2.1: City Places, Neighborhoods, Districts, and Corridors.** Maintain and enhance the character, distribution, built form, scale, and aesthetic qualities of the City's distinctive residential neighborhoods, business districts, corridors, and open spaces.	**No Conflict.** The Project would provide a multiple use luxury, hotel-driven, anchor development with ground level retail uses along North Rodeo Drive and South Santa Monica Boulevard and restaurant uses along South Santa Monica Boulevard and North Beverly Drive. The Project would also add 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. While the Project would increase the height, density, and mass of on-site structures as compared to existing conditions, the heights and massing of the building would specifically respond to the Project Site's location in the Business Triangle and the character of the area. In particular, retail and lower building heights (4 stories, 51 feet in height) would be located along the North Rodeo Drive frontage, Beverly Hills' premier shopping street, and at the intersection of North Rodeo Drive with Santa Monica Boulevard. Taller building heights would be placed along

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	South Santa Monica Boulevard (up to 6 stories, 78.5 feet in height) and North Beverly Drive (up to 9 stories, 115 feet in height), transitioning to a similar height as the existing building located to the east across North Beverly Drive (the 110-foot-tall Bank of America building). A landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard would further break up the massing of the Project, creating an open space courtyard for drop-off and pick-up for patrons and guests. Street trees and landscaping will be provided along the Project's ground floor perimeter, as well as landscaping on the fourth, sixth and ninth floors. The building's mass would thus be varied to enhance its pedestrian scale from the street. Additionally, the transparent outer wall of the lobby will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall. Furthermore, large openings are proposed at the ground floor restaurant to provide indoor/outdoor dining character and interest for pedestrians. Thus, the Project would not conflict with Goal LU-2 and Policy LU-2.1 by providing a project designed to reflect a high level or architecture and one that maintains and enhances the character of its surroundings.
Policy LU-2.2: Public Streetscapes and Landscape. Maintain and enhance the quality and health of the "green infrastructure" that contributes to the City's identity and quality of life, including its street trees, landscaped medians and parkways, parks, and open spaces, while seeking to conserve water resources.	**No Conflict.** As discussed in the Initial Study prepared for the Project, included in Appendix A of this Final EIR, existing landscaping within the Project Site is limited and includes ornamental shrubs in planters. There are no existing trees on the Project Site. There are 15 trees that line the sidewalks adjacent to the onsite buildings. These 15 street trees would be removed as part of the Project and replaced at a 1:1 basis. In addition, the Project includes a publicly-accessible 670 square-foot pedestrian plaza on the corner of North Rodeo Drive and South Santa Monica Boulevard that would be contiguous with the sidewalk and include private artwork. Furthermore, the transparent outer wall of the lobby will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall. Lastly, large openings are proposed at the ground floor restaurant to provide indoor/outdoor dining character and interest for pedestrians.
Policy LU-2.4: Architectural and Site Design. Require that new construction and renovation of existing buildings and properties exhibit a high level of excellence in site planning, architectural design, building materials, use of sustainable design and construction practices, landscaping, and amenities that contribute to the City's distinctive image and complement existing	**No Conflict.** Refer to discussion for Goal LU-2, above. In addition, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols, as required by the Beverly Hills Green Building Code and CALGreen. The Project would include articulated and modulated façades. Specifically, taller building heights would be placed along South Santa Monica Boulevard (up to 6 stories, 78.5 feet in height) and North Beverly Drive (up to

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
development.	9 stories, 115 feet in height), transitioning to a similar height as the existing building located to the east across North Beverly Drive (the 110-foot-tall Bank of America building). A landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard would further break up the massing of the Project, creating an open space courtyard for drop-off and pick-up for patrons and guests. The Project includes the dedication of land along South Santa Monica Boulevard to allow the widening of the public sidewalk, replacement of street trees and provision of continuous landscaping along the Project's ground floor perimeter. Furthermore, the transparent outer wall of the lobby will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall. Additionally, large openings are proposed at the ground floor restaurant to provide indoor/outdoor dining character and interest for pedestrians. The building's mass would thus be varied to enhance its pedestrian scale from the street, in further support of Policy LU-2.4 through the articulation of street-facing elevations to promote interest and a sense of quality.
Policy LU-2.6: City History. Acknowledge the City's history of places and buildings, preserving historic sites, buildings, and districts that contribute to the City's identity while accommodating renovations of existing buildings to maintain their economic viability, provided the new construction contextually "fits" and complements the site or building.	**No Conflict.** As discussed in Section 4.3, Cultural Resources, of this Final EIR, neither the Project Site nor any of the existing on-site buildings are listed in the National or California Registers and have not been designated as a Local Landmark. As determined in the Historic Resource Assessment Reports prepared for the Project, included as Appendix D of this Final EIR, the existing buildings on the Project Site do not qualify as historical resources. In addition, the Project would not indirectly affect any historical resources in the vicinity of the Project Site. The Historic Resources Review Report also included as part of Appendix D of this Final EIR identified six properties located approximately within two blocks of the Project Site that have been listed as Landmarks by the City of Beverly Hills. The closest of these six properties is the Writers and Artists Building at 9507 S. Santa Monica Boulevard. Based on the analysis provided in the Historic Resources Review Report as well as in Section 4.8, Noise, of this Final EIR (with regard to potential vibration impacts), the Project would not result in indirect impacts to historical resources located in the vicinity of the Project Site.
Policy LU-2.9: Public Safety. Require that development be located and designed to promote public safety by providing street-fronting uses, lighting, sightlines, and features	**No Conflict.** The Project would provide street-fronting retail, hotel, and restaurant uses as well as incorporate security features such as sufficient lighting throughout the Project Site to ensure safety and visibility and well illuminated entryways, walkways, lobbies, and parking

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
that enhance community safety.	areas to eliminate areas of concealment. Therefore, the Project would not conflict with this policy.
Goal LU-3: **Managed Change.** Managed change that respects and is complementary to the qualities that distinguish the City as a community, is orderly and well-planned, provides for the needs of existing and future residents and businesses, ensures the effective and equitable provision of public services, and makes efficient use of land and infrastructure. **Policy LU 3.1: Conservation.** Conserve existing residential neighborhoods, and non-residential areas where new development builds on and enhances the viability of existing business sectors that are the City's strengths, promotes transit accessibility, is phased to coincide with infrastructure funding and construction, and designed to assure transitions and compatibility with adjoining residential neighborhoods.	**No Conflict.** As discussed above for Goal LU-2, while the Project would increase the height, density, and mass of on-site structures as compared to existing conditions, the heights and massing of the building would specifically respond to the Project Site's location in the Business Triangle and the character of the area. In particular, retail and lower building heights would be located along the North Rodeo Drive frontage, Beverly Hills' premier shopping street, and at the intersection of North Rodeo Drive with South Santa Monica Boulevard. Taller building heights would be placed along South Santa Monica Boulevard (up to 6 stories, 78.5 feet in height) and North Beverly Drive (up to 9 stories, 115 feet in height), transitioning to a similar height as the existing building located to the east across North Beverly Drive (the 110-foot-tall Bank of America building). A landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard would further break up the massing of the Project, creating an open space/courtyard for drop-off and pick-up for patrons and guests. Additionally, as evaluated in the Initial Study for the Project, included in Appendix A of this Final EIR, existing public services and infrastructure would be sufficient to support the Project. As discussed in Section 2.0, Project Description, of this Final EIR, the Project Site is well served by a variety of public transit options, including local and regional bus lines. In particular, the Los Angeles County Metropolitan Transit Authority (Metro) serves several transit stops along North Santa Monica Boulevard and North Beverly Drive within approximately a ¼ 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. Project construction would occur within the boundaries of the existing Project Site and within existing off-site utilities rights-of-way and the Project would not impede accessibility to the transit options available in the vicinity of the Project Site. Furthermore, the Project Site is not located in or adjacent to the City's existing residential neighborhoods. The Project Site is located within the existing Business Triangle and the proposed range of uses (including hotel, retail, restaurants, and private club) are the same or similar uses to existing commercial businesses within the business

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	triangle and located on or adjacent to North Rodeo Drive. As such, the Project would not conflict with this goal and corresponding policy.
Policy LU-9.1: Uses for Diverse Customers. Accommodate retail, office, entertainment, dining, hotel, and visitor-serving uses that support the needs of local residents, attract customers from the region, and provide a quality experience for national and international tourists. **Policy LU-9.3: Anchor Locations.** It is also recommended that certain anchor locations be set aside to permit development of a higher intensity type of development which is not otherwise provided in the community. These areas should be located so as to be accessible from the City's major shopping areas and close to the City's major streets. These anchor locations should include those large parcels that are located at the gateways to the City, such as the site at 9900 Wilshire Boulevard where additional building height is appropriate. A variety of land uses such as commercial, residential, and mixed use should be considered for the gateway locations. A change of use from commercial to residential or mixed use should be allowed only if such change provides an adequate transition to adjacent single family neighborhoods. **Policy LU-9.4: Anchor Location Design Criteria.** The anchor location should encourage unified development oriented towards and along Wilshire Boulevard and at the intersection of North Rodeo Drive and South Santa Monica Boulevard[8] ~~after the word Wilshire Boulevard~~ planned to complement the scale and character of adjacent residential areas. In addition, development of the anchor locations should incorporate measures to enhance streets, sidewalks, and roadways in order to encourage pedestrian circulation	**No Conflict**. The Project would develop a multiple use luxury, hotel-driven, anchor development with up to 220,950 square feet and up to 115 guest rooms, including a penthouse, as per the proposed Specific Plan, 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. This mix of uses would support Policy LU-9.1 by providing a choice of uses and activities for the City's residents and visitors, and a quality experience for national and international tourists. Additionally, the Project would support Policies LU 9.3 and LU 9.4, as the Project would serve as an anchor location appropriate for higher intensity-type development and additional height, and would request an Amendment of General Plan Text, specifically concerning land use policy LU 9.4 Anchor Location Design Criteria in order to do so. The Project Site is large, accessible from major streets and close to other major streets. The unified multiple use commercial development incorporates measures to enhance the street and sidewalks, encouraging pedestrian circulation within the Business Triangle, along North Rodeo Drive, South Santa Monica Boulevard, and North Beverly Drive. These measures include pedestrian supportive uses along the sidewalk with large transparent windows providing views of the Project's Retail and Restaurant uses, new street trees similar to existing species, landscaped parkways, and other landscape features. Additionally, the transparent outer wall of the lobby will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall. Furthermore, large openings are proposed at the ground floor restaurant to provide indoor/outdoor dining character and interest for pedestrians.

[8] *The Project includes an Amendment of General Plan Text, specifically concerning land use policy LU 9.4 Anchor Location Design Criteria as underlined above to include the location of the Project Site as an anchor location.*

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
between these areas and the Business Triangle.	
Policy LU-11.2: **Site Planning and Architectural Design.** Require that commercial and office properties and buildings are planned and designed to exhibit a high level of site and architectural design quality and excellence. **Policy LU-11.3**: **Retail Street Frontages.** Require that development and street frontages in districts containing retail uses be designed and developed to promote pedestrian activity including: (a) location and orientation of the building to the sidewalk; (b) transparency of and direct access to the ground floor elevation from the sidewalk; (c) articulation of street-facing elevations to promote interest and sense of quality; (d) inclusion of uses and public spaces that extend interior functions to the sidewalk such as cafes and plazas; and (e) use of pedestrian-oriented signage and lighting.	**No Conflict.** The Project would support Policy LU-11.2 to exhibit a high level of site and architectural design quality and excellence through articulated and modulated façades. Specifically, taller building heights would be placed along South Santa Monica Boulevard (up to 6 stories, 78.5 feet in height) and North Beverly Drive (up to 9 stories, 115 feet in height), transitioning to a similar height as the existing building located to the east across North Beverly Drive (the 110-foot-tall Bank of America building). A landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard would further break up the massing of the Project, creating an open space/courtyard for drop-off and pick-up for patrons and guests. The building's mass would thus be varied to enhance its pedestrian scale from the street, in further support of Policy LU-11.3 through the articulation of street-facing elevations to promote interest and a sense of quality. In addition, the Project would include ground level retail uses on Rodeo Drive, ~~and~~ a restaurant with ground floor transparency as well as large openings to provide indoor/outdoor dining character and interest at the corner of North Beverly Drive and North Rodeo Drive, and a transparent outer wall of the lobby to provide visual access for pedestrians to a large fine art mural installed at the back lobby wall, thereby supporting Policy LU-11.3 by enhancing the character of the pedestrian-oriented retail shopping areas and providing ground floor transparency. The Project would further support Policy LU-11.3 by providing 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.
Policy LU-11.4: Parking in Pedestrian-Oriented Districts. Require that driveways be minimized in pedestrian-oriented commercial districts to avoid interruptions in the continuity of the pedestrian shopping experience, prioritizing driveway locations to side streets and alleys wherever feasible.	**No Conflict.** As discussed in Section 2.0, Project Description, of this Final EIR, primary access to the building and parking would be from South Santa Monica Boulevard from a valet motor court. The existing alley that runs north-south and is currently accessed from South Santa Monica Boulevard would be relocated to the southern portion of the Project Site. The new access point to the alley would be from the west side of North Beverly Drive. The proposed valet motor court on South Santa Monica Boulevard would be used for drop-off and pick-up for hotel guests, club members, spa, retail and restaurant patrons. Employees, valet driven vehicles, and small delivery vans would enter the Project's subterranean parking from the relocated alley off North Beverly Drive. Employees and small delivery vans would exit the

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	subterranean parking southbound through the existing alley. Full size delivery trucks would access the Project's surface-level loading docks via the relocated alley off North Beverly and exit southbound via the existing alley. Valet driven vehicles would return from the subterranean garage to the motor court via ground level on-site internal circulation. As described, designated vehicular access points would be established on the Project Site to minimize interruptions to the pedestrian experience.
Policy LU-11.5: Retail Streetscapes. Maintain and, where deficient, improve street trees, plantings, furniture, signage, public art, and other amenities that promote pedestrian activity.	**No Conflict.** The Project would include 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. In addition, the transparent outer wall of the lobby will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall. Furthermore, large openings are proposed at the ground floor restaurant to provide indoor/outdoor dining character and interest for pedestrians. ~~This~~ These features of the Project would support Policy LU-11.5 by providing amenities which promote pedestrian activity. The Project would further support Policy LU-11.5 by replacing all street trees to be removed, none of which are considered protected trees, with new palm trees at a 1:1 ratio.
Goal LU-13: Public and Quasi-Public Uses Supporting Resident Needs. Governmental, utility, institutional, educational, recreational, cultural, religious, and social facilities and services that are located and designed to complement the City's neighborhoods, centers, and corridors. **Policy LU-13.10: Parks and Open Spaces.** Seek to expand the City's parklands, greenways, and open spaces as land becomes available or as existing buildings are demolished. Consider alternative prototypes and standards for park development in urban areas where available land is limited.	**No Conflict.** The Project would support Policy LU-13.10 by providing 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. Furthermore, the Project would provide a variety of open space and recreational amenities onsite for hotel guests, club members and visitors. The proposed Project plans identify approximately 45,201 square feet of open space. This includes the publicly accessible pedestrian plaza proposed at the ground floor. Additionally, 4,760 square feet of outdoor restaurant and bar spaces on levels six and seven and the 742-square-foot outdoor terrace on the seventh level 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 and would include hotel room balcony/patio areas, pool deck, wellness center outdoor area, and penthouse pool deck.
Goal LU-14: Environmental Sustainability and Carbon Footprint. Land uses and built urban form that are environmentally sustainable by minimizing consumption of scarce resources, pollution, greenhouse gas	**No Conflict.** The Project would support Goal LU-14 and Policy LU-14.1 through its location 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 Santa Monica Boulevard and

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
emissions, wastes, and exposure of residents and visitors to toxics and hazards. **Policy LU-14.1: City Form.** Accommodate a balanced mix of land uses and encourage development to be located and designed to enable residents access by walking, bicycling, or taking public transit to jobs, shopping, entertainment, services, and recreation, thereby reducing automobile use, energy consumption, air pollution, and greenhouse gases.	North Beverly Drive within approximately a ¼ 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. Furthermore, the Project would enhance pedestrian activity by siting commercial uses on the ground level, installing new landscaping and streetscape improvements around the Project Site, and providing the aforementioned pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive. Additionally, the transparent outer wall of the lobby will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall. Furthermore, large openings are proposed at the ground floor restaurant to provide indoor/outdoor dining character and interest for pedestrians. The Project would also provide bicycle parking spaces, including charging facilities for e-bicycles, as well as employee lockers and showers on-site, to encourage bicycle commuting. Thus, the Project would provide opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution. In addition, the Project includes dedication of land along South Santa Monica Boulevard to allow to the widening of the public sidewalk, replacement of street trees and the provision of a continuous landscaped parkway.
Policy LU-14.2: Site Development. Require that sites and buildings be planned and designed to meet applicable environmental sustainability objectives by: (a) facilitating pedestrian access between properties and access to public transit; (b) providing solar access; (c) assuring natural ventilation; (d) enabling capture and re-use of stormwater and graywater on-site while reducing discharge into the stormwater system; and (e) using techniques consistent with the City's sustainability programs such as the City's Green Building Ordinance. **Policy LU-14.4: New Construction of Private Buildings.** Require that new and substantially renovated buildings be designed and constructed in accordance with the City's sustainability programs such as the City's Green Building Ordinance or comparable criteria to reduce energy, water, and natural resource consumption, minimize construction	**No Conflict.** Refer to discussion for Goal LU-14, above. In addition, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Beverly Hills Green Building Code and CALGreen. As provided in Section 2.0, Project Description, of this Final EIR, the Project would incorporate green construction standards and design consistent with the Leadership in Energy and Environmental Design (LEED) Green Building Rating System with a minimum rating of ~~Silver~~ Gold. Specific LEED features that would be incorporated into the Project include, but are not limited to: • Recessed windows, balconies and overhangs to shade window glazing, while allowing reflected and diffuse daylight into the building to enhance the use of natural light and reduce the need for artificial light sources; • Landscaping and exterior design utilizing subterranean parking and landscaped and shaded non-roof surfaces, light-colored, low-albedo roof surfaces to reduce local heat island effects; • The reduction of chlorofluorocarbons (CFCs) from the

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
wastes, use recycled materials, and avoid the use of toxics and hazardous materials. **Policy LU-14.5: Heat Island Effect**. Reduce "urban heat island" effect by requiring that new construction and substantial renovation of buildings use techniques to reduce the amount of heat that buildings, outdoor spaces, and parking lots absorb from sunlight.	building systems; • The selection of materials, such as adhesives, sealants, paints, and carpeting, that reduce off-gassing to improve internal air quality; • Installation of electric vehicle charging equipment and bicycle parking, including charging facilities for e-bicycles, as well as employee lockers and showers; • Solar ready collectors for 15 percent of the roof area excluding skylight areas for energy efficiency; • Recycling of a minimum of 50 percent of demolition and construction debris; and • The use of greywater for irrigation for landscape in areas inaccessible to hotel guests, club members, their respective guests and the public. Therefore, the Project would not conflict with these policies.
Policy LU-14.7: Public Streetscapes. Design and improve public streetscapes to enhance their attractiveness for walking as an alternative to automobile use and as a demonstration of the City's commitment to environmental sustainability by using techniques such as: (a) maintaining and enhancing the City's street trees and installing light-colored hardscapes to reduce heat; (b) selecting tree and plant species and irrigation systems that minimize water consumption; (c) exploring the use of recycled water for irrigation;(d) phasing in pedestrian-oriented energy-efficient lighting that does not result in excessive glare; (e) strategically locating benches and other street furniture that is constructed of recycled materials to provide resting spots and to demonstrate the use of alternative building materials; and (f) other comparable environmentally friendly streetscape improvements. **Policy LU 14.8: Private Development Landscaping Material and Irrigation**. Require the use of landscaping materials and irrigation systems that minimize water use and runoff onto public streets and drainage systems.	**No Conflict.** The Project would replace all street trees to be removed, none of which are considered protected trees, with new palm trees at a 1:1 ratio. In addition, the Project would install light-colored, low-albedo roof surfaces to reduce local heat island effects. The Project would also utilize greywater for irrigation for landscape in areas inaccessible to hotel guests, club members, their respective guests and the public. Furthermore, the Project would utilize energy-efficient lighting that does not result in excessive glare. Specifically, lighting on the Project Site would include architecturally-integrated exterior lights on the building, the motor court and other vehicle use areas, and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be installed throughout the Project Site. All exterior lighting would be dimmable and automatically controlled via occupancy sensors and photo sensors to allow for the appropriate control of nighttime lighting. Interior lighting would also be dimmable and would include the use of occupancy sensors. The proposed lighting sources would be similar to other lighting sources already within the Project Site and in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area. All exterior and interior lighting would meet the requirements of the California Energy Commission Building Energy Efficiency Standards—Title 24 and the National Electrical Code (NEC). Light trespass from interior spaces would be limited by blinds and/or drapery or the light fixtures would be installed in such a way as to not create light trespass off of the Project Site. Any new street and/or pedestrian lighting within the public

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	right-of-way would comply with all applicable City regulations.
Policy LU-15.1: Fiscal Prudence. The first key to economic sustainability is the efficient use of resources by an effective and streamlined local government with the ongoing mission of providing the residents and community with superb value for money. **Policy LU-15.2: Priority Businesses.** Retain and build upon the key business sectors contributing to the City's identity, economy, and revenue for resident services, such as entertainment-related Class-A offices, high-end retail and fashion, restaurant, hotel, technology, and supporting uses.	**No Conflict.** The Project would develop a multiple use luxury, hotel-driven, anchor development with up to 220,950 square feet and up to 115 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 quality and mix of uses would thereby support Policies LU-15.1 and LU-15.2 by providing a successful business that would contribute to the City's identity and culture within the Business Triangle, and promote the long-term stability and economic viability of the Business Triangle, that the City seeks to retain and build upon.
Policy LU-16.4: Public Places. Provide plazas, open spaces, and other outdoor improvements that are accessible to and used for public gatherings and activities, either through capital improvement or as a development requirement.	**No Conflict.** The Project would support Policy LU-16.4 by providing 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. Furthermore, the Project would provide a variety of open space and recreational amenities onsite for hotel guests and visitors. The proposed Project plans identify approximately 45,201 square feet of open space. This includes the publicly accessible pedestrian plaza proposed at street level on Rodeo Drive. Additionally, 4,760 square feet of outdoor restaurant and bar spaces on levels six and seven and the 742-square-foot outdoor terrace on the seventh level 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 and would include hotel room balcony/patio areas, pool deck, wellness center outdoor area, and penthouse pool deck.
Historic Preservation Element	
Goal HP-1: Value and Preserve Significant Cultural Resources. A community with well-preserved and maintained historic and cultural resources that provide a sense of permanence, foster civic pride and stewardship, and contribute to the unique identity and charm of the City.	**No Conflict.** As discussed in Section 4.3, Cultural Resources, of this Final EIR, neither the Project Site nor the existing buildings are listed in the National or California Registers or designated as a Local Landmark. As determined in the Historic Resources Assessment Reports prepared for the Project, included as Appendix D of this Final EIR, the existing buildings on the Project Site do not qualify as historical resources. As such, the Project would not directly affect any historic resources. In addition, Project construction would be confined to the Project Site and existing off-site utilities rights-of-way and no historic

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	resources in the vicinity of the Project Site would be affected by the Project. The Historic Resources Review Report also included as part of Appendix D of this Final EIR identified six properties located approximately within two blocks of the Project Site that have been listed as Landmarks by the City of Beverly Hills. The closest of these six properties is the Writers and Artists Building at 9507 S. Santa Monica Boulevard. Based on the analysis provided in the Historic Resources Review Report as well as in Section 4.8, Noise, of this Final EIR (with regard to potential vibration impacts), the Project would not result in indirect impacts to historical resources located in the vicinity of the Project Site.
Policy HP-1.8: Prehistoric or Historic Subsurface Archeological Features. Temporarily suspend all earth disturbing activity within 100-feet of a potential resource, if any such resources are discovered during construction-related earth-moving activities, to assess the significance of the find, and require appropriate mitigation before work resumes.	**No Conflict.** The Project would require grading and excavations up to 44 feet below grade. These construction activities could have the potential to disturb existing but undiscovered prehistoric or historic subsurface archeological features. As discussed in Section 4.3, Cultural Resources, of this Final EIR, should archaeological resources be discovered, the Project would temporarily suspend all earth disturbing activity within 100-feet of a potential resource, to assess the significance of the find, and require appropriate mitigation before work resumes. As such, the Project would not conflict with this policy.
Policy HP-1.9: Paleontological Resources Unearthed During Construction Activities. In the event that excavation reveals any paleontological resources, suspend earth disturbing work until the resource is evaluated. Allow work to resume only after the find has been appropriately mitigated.	**No Conflict.** The Project would require grading and excavations up to 44 feet below grade. These construction activities could have the potential to disturb existing but undiscovered paleontological resources. As discussed in Section 4.5, Geology and Soils (Paleontological Resources), of this Final EIR, should these resources be discovered, the Project would temporarily suspend earth disturbing work within 100-feet of a potential resource until the resource is evaluated and allow work to resume only after the find has been appropriately mitigated. As such, the Project would not conflict with this policy.
Open Space Element	
Policy OS-2.1: Trees of Significance. Require the retention of trees of significance (such as heritage trees) by promoting stewardship of such trees and ensuring that the design of development and reuse projects provide for the retention of these trees wherever possible. Where tree removal cannot be avoided, require replacements with an appropriate species. **Policy OS-2.2: Manage and Enhance.**	**No Conflict.** As discussed in the Initial Study prepared for the Project, included in Appendix A of this Final EIR, there are no existing trees within the Project Site; however, a total of 15 street trees were observed lining the sidewalks adjacent to the onsite buildings, including 12 palm trees and 3 Tipuana Tipu/Tipu trees. As detailed in the Tree Removal and Replacement Technical Memorandum, the 15 street trees inventoried are of various palm species and legume trees and are not considered protected trees. After obtaining all necessary City approvals, it is anticipated that

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
Continue to ensure that new construction incorporates trees where appropriate, and manages and cares for all publicly owned trees, works to retain healthy trees, and encourages planting appropriate species in appropriate locations. Maintain Tree City USA accreditation on an annual basis. **Policy OS-2.4: Viability of Commercial Corridors.** Balance the desire for street trees along commercial corridors with the need for clearance and visibility, including selection of tree species with appropriate canopies. **Policy OS-2.5: Urban Heat Island Effects.** Continue to promote appropriate species selection and tree placement that encourages adequate shading of rooftops, parking facilities, streets and other facilities to minimize heat island effects. Continue to phase street tree Master Plan projects to minimize tree canopy loss. **Policy OS-2.8: Species Selection & Diversification.** Assure the selection and placement of species suitable to the environment as appropriate. Assure proper diversification to avoid wholesale loss of trees due to disease or species-specific predators and to enhance species diversity. **Goal OS-3: Street Trees.** A strong, healthy, and well-maintained inventory of street trees to enhance the City's natural beauty and quality of life for its residents.	these existing street trees would be removed during construction of the Project. However, as part of the Project, the trees to be removed would be replaced with new palm trees at a 1:1 ratio. Replacement trees would be distributed in accordance with landscape and urban design guidelines to be adopted in connection with the Project's proposed Specific Plan. Furthermore, the Project would include landscaping to reduce local heat island effects by providing a landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard. Street trees and landscaping will also be provided along the Project's ground floor perimeter. Landscaping will also be provided on the fourth, sixth and ninth floors. As such, the Project would not conflict with these policies.
Goal OS-4: Recharge Groundwater Resources. Provision of a groundwater recharge system. **Policy OS-4.1: Permeable Surfaces.** Develop guidelines that limit the percentage of impermeable surface, such as asphalt, for large new or renovated public, institutional, residential, and commercial projects. Where feasible, require the use of landscaping and permeable surface treatments as alternatives. Develop aesthetic and functional criteria for repaving alleys and identify sources of materials available that meet these criteria.	**No Conflict.** As discussed in the Initial Study included in Appendix A of this Final EIR, the Project would decrease the amount of impervious area on the Project Site from 100 percent to approximately 87 percent, that, in conjunction with additional stormwater capture and reuse that would occur on-site, would result in a decrease in the amount of site runoff. Specifically, the Project would implement landscape planters and tree wells with substantial soil depth for incidental stormwater treatment, which would be considered pervious areas. Furthermore, as concluded in the Hydrology Report, the Project would be in compliance with LID requirements. As such, the Project would not conflict with this goal and associated policy.
Policy OS-4.2: Shallow Groundwater. Further enhance the City's efforts to minimize	**No Conflict.** In the event groundwater is encountered during Project construction, a temporary dewatering

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
shallow groundwater being discharged into the storm water system and encourage alternative means such as ground water recharging when dewatering subterranean structures. **Policy OS-4.3: Recycled Stormwater.** Explore methods of retaining and using storm water that would otherwise go into storm drains as runoff.	system would be utilized and the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. Additionally, the Project would comply with Beverly Hills Municipal Code Section 9-4-610 which establishes a permitting process and options for dewatering properties and also supports Policies OS-4.2 and OS-4.3. These options include: • Replenish the ground water basin. The dewaterer will have to adhere to all state and federal laws to implement ground water replenishment. • Put the water to reasonable and beneficial use on the property. A permit and an annual consumption and usage report will be required for any dewaterer that uses its ground water for beneficial use. • Deliver the ground water to the City. An agreement will be established between the dewaterer and the City under this option. • If the first three options are impracticable, obtain a permit and pay a replenishment fee. Furthermore, the Project would include the use of greywater for irrigation for landscape in areas inaccessible to hotel guests, club members, their respective guests and the public.
Goal OS-5: Water Quality Protection. Protection of local watersheds and groundwater resources. **Policy OS-5.1: Stormwater Quality.** Control sources of pollutants and improve and maintain urban runoff water quality through stormwater protection measures consistent with the City's National Pollutant Discharge Elimination System (NPDES) permit.	**No Conflict.** Project construction would disturb more than one acre of soil and as such the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth Best Management Practices (BMPs) to be used during construction to manage stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Beverly Hills Stormwater and Urban Runoff Pollution Control Ordinance. The SWPPP would specify BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs would be designed to contain stormwater or construction watering on the Project Site during the construction phase such that runoff does not impact off-site drainage facilities or

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	receiving waters. Additionally, as concluded in the Hydrology Report, the Project would comply with LID requirements that would address stormwater concerns during operation. Improvements to the Project Site that would treat stormwater include constructing storm drainage infrastructure, including storm drain inlets internal to the site and within the private driveways, to convey on-site runoff to a stormwater treatment system. The proposed stormwater treatment system would consist of an underground rainwater harvesting cistern which would capture the stormwater runoff and then dispose of it via metered discharge to the City's system. Furthermore, the Project would implement landscape planters and tree wells with substantial soil depth for incidental stormwater treatment, which would be considered pervious areas. The Project would thus decrease the amount of impervious area on the Project Site from 100 percent to approximately 87 percent as a result of additional stormwater capture that would occur on-site. Also refer to discussion under Goal OS-4 and Policy OS-4.2.
Policy OS-5.6: Extensive Landscaping. Require extensive landscaping of open space areas on a property to provide the maximum permeable surface area to increase infiltration, reduce site runoff, control the overland migration of silt, and reduce the amount of surface paving. Provide guidance to property owners on recommended water efficient plant materials.	**No Conflict.** The Project would include landscaping and thereby maximize permeable surface area. As provided in the Initial Study included in Appendix A of this Final EIR, the Project would decrease the amount of impervious area on the Project Site from 100 percent to approximately 87 percent, that, in conjunction with additional stormwater capture and reuse that would occur on-site, would result in a decrease in the amount of site runoff. Specifically, the Project would implement landscape planters and tree wells with substantial soil depth for incidental stormwater treatment, which would be considered pervious areas.
Goal OS-6: Visual Resource Preservation. Maintenance and protection of significant visual resources and aesthetics that define the City. **Policy OS-6.1: Protection of Scenic Views**. Seek to protect scenic views and vistas from public places including City landmarks, hillside vistas, and urban views of the City. **Policy OS-6.3: Landscaping.** Require that new development be located and designed to visually complement the urban setting by providing accessible, landscaped entries, courtyards, and plazas. **Policy OS-6.4: Minimize Removal of Existing Resources.** Require new commercial, office, and residential	**No Conflict.** As illustrated in the visual simulations of the Project Site and vicinity included as part of the Initial Study provided in Appendix A, due to the highly urbanized and built out surroundings, as well as relatively flat topography, no publicly available scenic vistas of any valued visual resources exist in the vicinity of the Project Site. Therefore, development of the Project would not have the potential to substantially or adversely affect a scenic vista since none currently exist. Furthermore, the Project would include 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 as well as a landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard, creating an open space/courtyard for drop-off and pick-up for patrons and guests and so it would not conflict with Policy OS-6.3. As previously discussed, there are no existing

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
development to minimize the removal of mature trees and other significant visual resources present on the site.	trees within the Project Site that would be removed as part of the Project; however, a total of 15 street trees were observed lining the sidewalks adjacent to the onsite buildings, which would be removed as part of the Project. However, as part of the Project, the trees to be removed would be replaced at a 1:1 ratio.
Policy OS-6.5: Standards for New Development. Seek to ensure that new development does not adversely impact the City's unique urban landscape.	**No Conflict.** The Project would not adversely impact the City's unique urban landscape. The Project would incorporate modulation of building heights and massing, articulation of building façades at all elevations, and pedestrian-friendly treatments along the public right-of-ways. The heights and massing of the building specifically respond to the Project Site's location in the Business Triangle and the character of the area. In particular, retail and lower building heights (4 stories, 51 feet in height) would be located along the North Rodeo Drive frontage, Beverly Hills' premier shopping street, and at the intersection of North Rodeo Drive with Santa Monica Boulevard. Taller building heights would be placed along South Santa Monica Boulevard (up to 6 stories, 78.5 feet in height) and North Beverly Drive (up to 9 stories, 115 feet in height), transitioning to a similar height as the existing building located to the east across North Beverly Drive (the 110-foot-tall Bank of America building). A landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard would further break up the massing of the Project, creating an open space/courtyard for drop-off and pick-up for patrons and guests. Building façades on all elevations are designed with recessed windows, balconies, and awnings creating shade and shadow patterns and visual interest. The transparent outer wall of the lobby will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall. Additionally, large openings are proposed at the ground floor restaurant to provide indoor/outdoor dining character and interest for pedestrians. Landscaping would also be used throughout the Project to soften the building façades. Therefore, the Project would not conflict with this policy.
Policy OS-6.6: Lighting. Minimize obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary. **Policy OS-6.7: Glare.** Require that new development avoid the creation of incompatible glare through use of appropriate materials and design features.	**No Conflict.** The Project would utilize minimally obtrusive outdoor lighting that does not result in excessive glare. Specifically, lighting on the Project Site would include architecturally-integrated exterior lights on the building, the motor court and other vehicle use areas, and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be installed throughout the Project Site. All exterior lighting would be dimmable and automatically controlled via occupancy

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	sensors and photo sensors to allow for the appropriate control of nighttime lighting. Interior lighting would also be dimmable and would include the use of occupancy sensors. The proposed lighting sources would be similar to other lighting sources already within the Project Site and in the vicinity of the Project Site and would not generate artificial light levels that are out of character with the surrounding area. Light trespass from interior spaces would be limited by blinds and/or drapery or the light fixtures would be installed in such a way as to not create light trespass off of the Project Site. Any new street and/or pedestrian lighting within the public right-of-way would comply with all applicable City regulations.
Goal OS-7: Improved Air Quality. Improved health and sustainability of the community through improved regional air quality and reduced greenhouse gas emissions that contribute to climate change. **Policy OS-7.5: Coordination with South Coast Air Quality Management District (SCAQMD).** Coordinate with SCAQMD to ensure that projects incorporate feasible mitigation measures if those measures are not already provided for through project design. **Policy OS-7.7: Maintain Standards**. Work with the South Coast Air Quality Management Board to meet state and federal ambient air quality standards. **Policy OS-7.8: Emissions Reduction.** Require new development projects that exceed the South Coast Air Quality Management Board's (SCAQMB) Reactive Organic Gases (ROG) and Nitrogen Oxides (NOX) operational thresholds to incorporate design or operational features that reduce emissions equal to 15-percent from the level that would be produced by an unmitigated project. **Policy OS-7.9: Greenhouse Gas Reduction**. Work with the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD) to comply with statewide greenhouse gas reduction goals as established in the "Global Warming Solutions Act of 2006 for 2020" (AB 32) and any other subsequent legislation. **Policy OS-7.12: New Development**. Review	**No Conflict.** The Project would be located in an area well served by a variety of public transit options, including local and regional bus lines. 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. In addition, the Project would include bicycle parking, including charging facilities for e-bicycles, as well as employee lockers and showers to promote bicycle commuting and would be designed to attract and promote pedestrian activity. The Project has also been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Beverly Hills Green Building Code and CALGreen. In particular, the Project would incorporate green construction standards and design consistent with the Leadership in Energy and Environmental Design (LEED) Green Building Rating System with a minimum rating of ~~Silver~~ Gold, as previously described. The Project would also be highly walkable, as a hotel sited in an urban area close to visitor-serving amenities. For the reasons listed above, the Project would support Policy OS-7.9 to reduce greenhouse gasses, as further discussed in Section 4.6, Greenhouse Gas Emissions. The Project would further support Policies OS-7.7, OS-7.8, and OS-7.12 by ensuring that it would comply with the applicable policies set forth in the SCAQMD's AQMP, as discussed in Section 4.1, Air Quality, of this Final EIR.

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
proposed development projects to ensure projects incorporate feasible measures that reduce construction and operations emissions for Reactive Organic Gases (ROG), Nitrogen Oxides (NOX), and Particulate Matter (PM10 and PM2.5).	
Circulation Element	
Goal CIR-1: Circulation System. Provide a safe and efficient roadway circulation system within the City. **Policy CIR 1.4: Level of Service**. Develop standards to address regional traffic growth through the City to promote transit ridership, biking, and walking, thereby reducing auto travel, air pollution, and energy consumption **Policy CIR-1.4c: Strive to maintain operations on roadways and intersections within multi-modal districts**. Multimodal districts are characterized as areas within the City served by frequent transit service, enhanced pedestrian and bicycle systems, and areas that include a combination of uses (commercial, retail, office or residential). This shall include the Business Triangle, areas within ½ mile walking distance of bus, subway and other major transit stops and stations, and designated commercial corridors.	**No Conflict.** As previously discussed, the Project would provide bicycle parking space, 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. 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 Policy CIR-1.4c to maintain operations on roadways within multi-modal districts through the use of a valet service and alley access to a subterranean parking garage. Specifically, the proposed valet motor court on South Santa Monica Boulevard would be used for drop-off and pick-up for hotel guests, club members, spa, retail and restaurant patrons. Employees, valet driven vehicles, and small delivery vans would enter the Project's subterranean parking from the relocated alley off North Beverly Drive. Employees and small delivery vans would exit the subterranean parking southbound through the existing alley. Full size delivery trucks would access the Project's surface-level loading docks via the relocated alley off North Beverly Drive and exit southbound via the existing alley. Valet driven vehicles would return from the subterranean garage to the motor court via ground level on-site internal circulation. Regarding level of service, as previously noted, 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 for traffic level of service (LOS). This started a process that changed 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. As such, LOS is not analyzed as part of this EIR. However, the City of Beverly Hills developed Local Transportation Assessment Guidelines at the time it adopted its new

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	VMT-focused transportation thresholds in October 2019. The City's Local Transportation Assessment Guidelines includes an analysis of site access and level of service, although such analysis is not provided for determining impacts under CEQA.
Goal CIR-2: Transit. Development of a safe, comprehensive, and integrated transit system that serves as an essential component of a multi-modal mobility system within the City. **Policy CIR-2.2: Multi-modal Transit.** Consider a variety of transit services including rail, light rail transit, bus rapid transit, trolleys (streetcars), enhanced buses, express buses, local buses, school buses, and neighborhood shuttles to meet the needs of residents, workers, and visitors. **Policy CIR-2.3: Transit Design.** Support a well-designed transit system and stations to meet the mobility needs of residents and visitors, including seniors, the disabled and transit-dependent persons.	**No Conflict.** 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 and the Metro D (formerly Purple) Line Rodeo Station currently under construction approximately 0.4 miles walking distance from the Project Site, as previously described. The availability of public transit options would also support Policy CIR-2.3 to meet the mobility needs of residents and visitors, including seniors, the disabled and transit-dependent persons.
Goal CIR-6: Transportation Demand Management (TDM). A reduction in single-occupant motor vehicle travel in the City through Transportation Demand Management (TDM) that ensures efficiency of the existing transportation network and promotes the movement of people instead of personal automobiles. **Policy CIR-6.4: Transportation Demand Amenities.** Encourage employers to provide transit subsidies, bicycle facilities (including changing/shower facilities), alternative work schedules, ridesharing, telecommuting, work-at-home programs, employee education, and preferential parking for carpools/vanpools. **Policy CIR-6.7: Multi-Modal Design.** Require proposed development projects to implement site designs and on-site amenities that support alternative modes of transportation, and consider TDM programs with achievable trip reduction goals as partial mitigation for project traffic impacts.	**No Conflict.** The Project would provide bicycle parking space, 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 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. Additionally, as provided in the Transportation Impact Report included in Appendix H of this Final EIR, the Project would result in less-than-significant VMT impacts and would not require the implementation of a TDM plan, although the Project would provide employees with transit passes. Therefore, the Project would not conflict with this goal and associated policies.
Goal CIR-7: Pedestrians. A safe and comfortable pedestrian environment that results in walking as a desirable travel choice,	**No Conflict.** The Project would support Goal CIR-7 for a safe and comfortable pedestrian environment. Specifically, the proposed driveways to the valet motor

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
particularly for short trips, within the City. **Policy CIR-7.1: Pedestrian Safety.** Design and maintain sidewalks, streets, and intersections to emphasize pedestrian safety and comfort through a variety of street design and traffic management solutions. **Policy CIR-7.2: Pedestrian Crossings.** Provide well-marked pedestrian crossings at intersections and midblock locations. **Policy CIR-7.3: Streetscape Enhancements**. Update or prepare Design Guidelines that foster the enhancement of streets, sidewalks, and other public rights-of-way with amenities such as lighting, street trees, benches, plazas, public art, or other measures to encourage walking.	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. Overall, the Project would not substantially increase hazards to bicyclists, pedestrians, or vehicles, or otherwise adversely affect the performance or safety of such facilities (Policies CIR-7.1 and CIR-7.2). 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 and a landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard (Policy CIR-7.3). In addition, the transparent outer wall of the lobby will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall. Furthermore, large openings are proposed at the ground floor restaurant to provide indoor/outdoor dining character and interest for pedestrians. Lastly, the Project includes dedication of land along South Santa Monica Boulevard to allow the widening of the public sidewalk, replacement of street trees and provision of a continuous landscaped parkway. As such, the Project would not conflict with this goal and corresponding policy.
Goal CIR-8: Bikeways. An integrated, complete, and safe bicycle system to encourage bicycling within the City. **Policy CIR-8.5: Bikeway Amenities.** Require that new development projects (e.g., employment centers, educational institutions, and commercial centers) provide bicycle racks, personal lockers, showers, and other bicycle support facilities. **Policy CIR-8.8: Bicycle Access.** Require new development projects on existing and potential bicycle routes to facilitate bicycle and pedestrian access to and through the project, through designated pathways.	**No Conflict.** The Project would include secure, bicycle parking spaces with charging facilities for e-bicycles, and facilities for bicycle users, including employee lockers and showers, thereby supporting bicycle commuting. Therefore, the Project would not conflict with this goal and corresponding policy.
Goal CIR-11: Role of the Alleys. With the major exception of the area east of Robertson Boulevard and parts of the area north of Sunset Boulevard, the City is fully served by alleys which traverse midblock and provide rear service to the City's residential, commercial and industrial parcels. These	**No Conflict.** The Project would provide alley access to loading docks at the Project Site and would ensure continued access to other commercial properties within the relocated alley. Specifically, service access would be provided through a new alignment of the existing alley which currently bisects the Project Site. As concluded by the Alley Study completed by Hirsch Green on April 28,

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
alleys play an important and complex role in the structure of the City. **Policy CIR-11.1: Alleys.** By virtue of serving as the primary network for utility locations, trash removal, loading and unloading facilities, alternate emergency access, alleys vastly simplify the function of the streets and permit a higher degree of efficiency and visual quality along the streets. Alleys also provide an additional buffer between parcels so as to further insulate incompatible uses and development. **Policy CIR-11.2.c: In commercial areas, however, there is the additional concern for alley relocation and/or closure, which may be desirable in conjunction with specific development proposals.** As important as they are, the existence of the alleys should not preclude consideration of proposals which would alter them if satisfactory alternate services would be provided. In certain instances, development proposals which would utilize the alley may provide a type or quality of development or access which better serves the City's objectives and as such, should be considered. Such development proposals might include alley closure which would permit unified development across an entire block or permit safer street access, or use of the alley as part of a landscaped pedestrian plaza or mall, or relocation of an alley of a more functional arrangement of structures or possible consideration of the space above or below the alley for parking purposes.	2020, included in Appendix H of this Final EIR, the relocation of a portion of the public alley currently bisecting the Project Site would not substantially increase hazards or result in an incompatible use. Although there would be an increase of eastbound traffic traveling through the intersection of South Santa Monica Boulevard and North Beverly Drive in order to enter the alley using the newly created west alley entrance, the increase would be nominal, amounting to one or two new vehicles per signal cycle. The Alley Study also included supplemental vehicle turning movement evaluations to assess whether vehicles using the alley, as well as vehicles that are anticipated to use it such as fire trucks and other emergency vehicles, can maneuver the 90-degree turn the relocation would create. The results of these evaluations concluded that they would be able to do so, although it is recommended that the deliveries are scheduled for off-peak times. 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 on-site loading bays will not significantly impact the alley. The Project is a unified luxury retail, hotel, and private club multiple-use development located across an entire block in a commercial area and involves the relocation of a portion of an existing public alley. This scenario is anticipated by Policy CIR-11.2.c, which specifies that the existence of an alley should not preclude consideration of a unified development across an entire city block that includes alteration of an alley if satisfactory alternative services are provided. Therefore, the Project would not conflict with this goal and associated policies.
Conservation Element	
Goal CON-1: Water Supply System. High-quality reliable water supply, treatment, distribution, pumping and storage systems that provide water as affordably as possible and meet current and future daily and peak water demands of the City, considering the sustainability goals and policies in this general plan. **Policy CON-1.3: Water Distribution System**. Upgrade, maintain, and expand water supply, distribution, pumping, storage, and treatment including facilities to address	**No Conflict.** Water service to the Project Site would continue to be supplied by the City's Department of Public Works for domestic and fire protection uses. As discussed in the Initial Study included as Appendix A of this Final EIR, based on required service size and location of firewater infrastructure within the proposed building, it is anticipated that the firewater service would connect to either the 8-inch water line in the alley or the 12-inch water line in South Santa Monica Boulevard. The Project Site would also continue to be served by the existing fire hydrant adjacent to the Project Site. As part of the Project, the existing 8-inch water line within the alley will be

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
potential shortages in water supply from the California State Water Project and the Colorado River. **Policy CON-1.6: Development Requirements—Water Service.** Require new development to be served from an approved domestic water supply. **Policy CON-1.7: Development Requirements—Groundwater.** Require engineering design and construction practices to ensure that existing and new development does not degrade the City's groundwater supplies.	removed and rerouted where it is in conflict with the proposed development. This would include capping the water line at the terminus of the alley at South Santa Monica Boulevard, which would not impact other properties using the water line because an existing water line already exists along South Santa Monica Boulevard. Looping of the water line within the alley to tie back into the main line on Brighton Way is proposed as part of the Project. The City Public Works Water Division has preliminarily reviewed the proposed conceptual water system design and approved this component of the Project. In any event, the Project would comply with the applicable requirements of the City for installation of the final plans for relocation of the water line. Overall, as concluded in the Utility Memorandum, based on the existing infrastructure in the vicinity of the Project Site, there is sufficient capacity to serve the Project under either the proposed conceptual site plan or the Specific Plan area maximums. As further discussed in the Initial Study, the Project would decrease the amount of impervious area on the Project Site from 100 percent to approximately 87 percent, that, in conjunction with additional stormwater capture and reuse that would occur on-site, would result in a decrease in the amount of Site runoff. Specifically, the Project would implement landscape planters and tree wells with substantial soil depth for incidental stormwater treatment, which would be considered pervious areas. Additionally, in the event groundwater is encountered during Project construction, a temporary dewatering system would be utilized, and the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. Additionally, the Project would comply with Beverly Hills Municipal Code Section 9-4-610 which establishes a permitting process and options for dewatering properties. These options include: • Replenish the ground water basin. The dewaterer will have to adhere to all state and federal laws to implement ground water replenishment. • Put the water to reasonable and beneficial use on the property. A permit and an annual consumption and usage report will be required for any dewaterer that uses its ground water for beneficial use. • Deliver the ground water to the City. An agreement will be established between the dewaterer and the City under this option. • If the first three options are impracticable, obtain a

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	permit and pay a replenishment fee. As such, the Project would not conflict with Policy CON-1.7.
Goal CON-2: Water Conservation through System Improvements. Provision of a system that minimizes water consumption through conservation methods and other techniques. **Policy CON-2.4: Water Conservation Measures for Private Projects.** Continue providing incentives, and where practical, require the installation of water conserving measures, devices and practices for new private construction projects and major alterations to existing private buildings, including requirements for using reclaimed water for construction watering and for pumping subterranean water back into the ground rather than into the storm drain system. **Policy CON-2.5: Water Efficient Landscaping.** Where feasible, encourage installation of drought tolerant landscaping or water-efficient irrigation systems for all private and city landscaping and parkways. Identify and implement minimum design and installation efficiency criteria for landscape irrigation systems.	**No Conflict.** The Project would support Goal CON-2 and Policy CON-2.4 to conserve water through the use of greywater for irrigation for landscape in areas inaccessible to hotel guests, club members, their respective guests and the public. The Project would also support Policy CON-2.5 by installing a water-efficient irrigation system. Additionally, landscaping for the Project would include drought-tolerant species. Therefore, the Project would not conflict with this goal and associated policies.
Goal CON-3: Water Conservation through Reduced Consumption. Conservation programs that limit water consumption through site design, the use of water conservation systems and other techniques. **Policy CON-3.5: Restrict Water Runoff**. Restrict wasteful watering methods and control runoff. **Policy CON-3.8: Water Conservation Measures for Private Projects.** Require the installation of water conserving measures, devices and practices that meet "green building" standards for new private construction projects and major alterations to existing private buildings. **Policy CON-3.9: Water-Efficient Landscaping.** Encourage and promote drought-tolerant landscaping or water efficient	**No Conflict.** The Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Beverly Hills Green Building Code and the 2019 CALGreen. As provided in Section 2.0, Project Description, of this Final EIR, the Project would incorporate green construction standards and design consistent with the Leadership in Energy and Environmental Design (LEED) Green Building Rating System with a minimum rating of ~~Silver~~ Gold. Specifically, the Project would support Goal CON-3 and Policy CON-3.5 to limit water runoff through compliance with the City's Urban Runoff Pollution Control Ordinance and implementation of standard erosion controls. Additionally, the Project would support Policy CON-3.5 to conserve water through the use of greywater for irrigation for landscape in areas inaccessible to hotel guests, club members, their respective guests and the public. Additionally, as discussed in the Utility Memo, the Project

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
irrigation systems for all private and city landscaping and parkways. **(Policy CIR-2.2).Policy CON-3.10: Optimum Timing for Water Irrigation.** Require that all public and private irrigation systems irrigate at optimum times of the day, such as early mornings, or late afternoon and use weather sensors to facilitate optimum irrigation. Develop an enforcement mechanism and regulations to prohibit wasteful irrigation and water use practices, such as watering for street cleaning, and utilize technology to permit monitoring and control. **Policy CON-3.11:** New Conservation Technology. Ensure all new private and City facility projects utilize conservation technologies.	would limit indoor water use by requiring plumbing fixtures to meet or exceed the water use limits as prescribed by the 2019 California Green Building Standards Code (CALGreen). 2019 CALGreen sets a 20 percent reduction of water use as compared to previous editions of CALGreen and sets a nationwide standard in green building and water conservation. The Project would also support Policy CON-3.9 by installing a water-efficient irrigation system and Policy CON-3.11 by utilizing conservation technology. Therefore, the Project would not conflict with this goal and associated policies.
Goal CON-6: Groundwater Recharge. A system that recharges the groundwater resources. **Policy CON-6.1: Alleys.** Develop aesthetic and functional criteria for repaving of alleys and explore whether materials are available that could increase the amount of permeable surfaces. **Policy CON-6.2: Stormwater.** Require that grading plans be designed and implemented to reduce storm water runoff by capturing rainwater onsite and stored on a temporary, short-term basis to facilitate groundwater recharge rather than relying solely on community drainage facilities. **Policy CON-6.3: Shallow Groundwater.** Further enhance the City's efforts to minimize shallow groundwater being discharged to the stormwater system, and encourage beneficial use instead of dewatering subterranean structures.	**No Conflict.** The Project would support Goal CON-6 and Policy CON-6.2 to recharge groundwater resources. As provided in the Initial Study prepared for the Project included in Appendix A of this Final EIR, the Project would decrease the amount of impervious area on the Project Site from 100 percent to approximately 87 percent, that, in conjunction with additional stormwater capture and reuse that would occur on-site, would result in a decrease in the amount of Site runoff. Specifically, the Project would implement landscape planters and tree wells with substantial soil depth for incidental stormwater treatment, which would be considered pervious areas. Furthermore, the Project would support Policy CON-6.3 through the consideration of beneficial use in the event of dewatering. Specifically, in the event groundwater is encountered during Project construction, a temporary dewatering system would be utilized and the groundwater extracted would be chemically analyzed to determine the appropriate treatment and/or disposal methods. Additionally, the Project would comply with Beverly Hills Municipal Code Section 9-4-610 which establishes a permitting process and options for dewatering properties. These options include: • Replenish the ground water basin. The dewaterer will have to adhere to all state and federal laws to implement ground water replenishment. • Put the water to reasonable and beneficial use on the property. A permit and an annual consumption and usage report will be required for any dewaterer that uses its ground water for beneficial use.

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	• Deliver the ground water to the City. An agreement will be established between the dewaterer and the City under this option. • If the first three options are impracticable, obtain a permit and pay a replenishment fee. Therefore, the Project would not conflict with this goal and associated policies.
Goal CON-7: Wastewater Treatment System. A wastewater collection and treatment system that supports existing and planned development. **Policy CON-7.2: Municipal Connections & Capacity**. Require that development be connected to the municipal sewer system and ensure that adequate capacity is available for the treatment of generated wastewater flows and the safe disposal of generated sludge. **Policy CON-7.3: Sewer Analysis for New Development**. Require that new development and major renovation projects submit a sewer analysis outlining capacity and improvement needs to the satisfaction of the City prior to the issuance of building permits. **Policy CON-7.4: Water Conservation**. Require that wastewater flows be minimized in existing and future developments through water conservation and recycling efforts.	**No Conflict.** As provided in the Initial Study, wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant (HWRP). The HWRP has a capacity of 450 million gallons per day (mgd), and current average wastewater flows are at approximately 275 mgd. Accordingly, the remaining available capacity at the HWRP is approximately 175 mgd. The Project would generate a net increase in wastewater flow from the Project Site of approximately 55,795 gpd, or approximately 0.055 mgd. The Project's increase in average daily wastewater flow of 0.056 mgd would represent approximately 0.03 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP. As further discussed in the Initial Study included in Appendix A of this Final EIR, it was determined that the total peak flow currently within the 8-inch sewer main is 0.48 cubic feet per second (310,200 gallons per day). With addition of the peak flow estimated for the Project (approximately 0.24 cubic feet per second), the flow in the existing 8-inch sewer main in the alley would increase to approximately 0.70 cubic feet per second, or approximately at 41.5 percent of its capacity. Therefore, the existing 8-inch sewer main in the alley would have adequate capacity to serve the Project under either the proposed conceptual site plan or Specific Plan area maximums. The Project would also conserve water through the use of greywater for irrigation for landscape in areas inaccessible to hotel guests, club members, their respective guests and the public. Therefore, the Project would not conflict with this goal and associated policies.
Goal CON-8: Public Safety. Wastewater collection and treatment facilities that operate in a manner that maximizes public safety. **Policy CON-8.2: Waste Discharge Requirements**. Continue to require that all industrial and business sewer discharges comply with the City's waste discharge	**No Conflict.** Wastewater flows for the Project would be typical of commercial developments. No industrial discharge into the wastewater system would occur. Discharge of effluent from the HWRP into Santa Monica Bay is also regulated by permits issued under the NPDES and is required to meet LARWQCB requirements. In accordance with the requirements of the NPDES

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
requirements and permits as outlined in the City Ordinance. **Policy CON 8.3: National Pollutant Discharge Elimination System (NPDES) and South Coast Air Quality Management District (SCAQMD) Regulations.** Continue to implement, as appropriate, the requirements of the NPDES and SCAQMD regulations, including requiring the use of Best Management Practices by businesses in the City.	Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth Best Management Practices (BMPs) to be used during construction to manage stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Beverly Hills Stormwater and Urban Runoff Pollution Control Ordinance. The SWPPP would specify BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. The Project would also implement the requirements of the SCAQMD as detailed in Section 4.1, Air Quality, of this Final EIR. Therefore, the Project would not conflict with this goal and associated policies.
Goal CON-10: Storm Drainage System. Provision of a fiscally sustaining storm drainage system that reduces pollutants entering the ocean. **Policy CON-10.3**: **Storm Runoff Impacts.** Require new development to prepare hydrologic studies to assess storm runoff impacts on the local and sub-regional storm drainage systems, and, if warranted, require new development to provide adequate drainage facilities and mitigate increases in stormwater flows and/or cumulative increases in regional flows. Require final drainage plans be submitted for review and approval.	**No Conflict.** Project construction would disturb more than one acre of soil and as such the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth Best Management Practices (BMPs) to be used during construction to manage stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Beverly Hills Stormwater and Urban Runoff Pollution Control Ordinance. The SWPPP would specify BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. Therefore, the Project would not conflict with this goal and associated

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	policy. Furthermore, as concluded in the Hydrology Report, the Project would comply with LID requirements that would address stormwater concerns during operation. Improvements to the Project Site that would treat stormwater include constructing storm drainage infrastructure, including storm drain inlets internal to the site and within the private driveways, to convey on-site runoff to a stormwater treatment system. The proposed stormwater treatment system would consist of an underground rainwater harvesting cistern which would capture the stormwater runoff and then dispose of it via metered discharge to the City's system. Additionally, the Project would implement landscape planters and tree wells with substantial soil depth for incidental stormwater treatment, which would be considered pervious areas. The Project would thus decrease the amount of impervious area on the Project Site from 100 percent to approximately 87 percent as a result of additional stormwater capture that would occur on-site.
Goal CON-11: Storm Drainage System that Preserves Water Quality. Provision of a storm drainage system that does not degrade the quality of the City's surface waters, groundwater system, and other sensitive environmental areas. **Policy CON-11.1: Development Mitigation.** Require that new development does not degrade surface waters or the groundwater system. **Policy CON-11.2: Pollution Loading.** Reduce pollutant loading through passive treatment systems such as vegetated filter strips, grass swales, and infiltration/sedimentation areas in suitable open space areas, overland flow channels and landscaping adjacent to parking lots and streets. **Policy CON-11.3: National Pollutant Discharge Elimination System (NPDES) Permit**. Require developers to obtain and comply with a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board (SWRCB). **Policy CON-11.4: Drainage Technology**. Require that new developments employ the most efficient drainage technology to control	**No Conflict.** Project construction would disturb more than one acre of soil and as such the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth Best Management Practices (BMPs) to be used during construction to manage stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/ exit, wind erosion control, and stockpile management. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Beverly Hills Stormwater and Urban Runoff Pollution Control Ordinance. The SWPPP would specify BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters (Policies CON-11.1 and CON-11.3). Additionally, the Project would decrease the amount of impervious area on the Project Site from 100 percent to approximately 87 percent as a result of additional stormwater capture that would occur on-site. Specifically, the Project would implement landscape planters and tree

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
drainage and minimize damage to environmentally sensitive areas. **Policy CON-11.5: Pesticides.** Require that individual project owners and operators handle, store, apply, and dispose of all pest control, herbicide, insecticide, and other similar substances in compliance with all applicable Federal, State, and local regulations.	wells with substantial soil depth for incidental stormwater treatment, which would be considered pervious areas (Policy CON-11.2). Furthermore, the Project would utilize efficient technology through the use of greywater for irrigation for landscape in areas inaccessible to hotel guests, club members, their respective guests and the public. In addition, as concluded in the Hydrology Report, the Project would comply with LID requirements that including storm drain inlets internal to the site and within the private driveways, to convey on-site runoff to a stormwater treatment system. The proposed stormwater treatment system would consist of an underground rainwater harvesting cistern which would capture the stormwater runoff and then dispose of it via metered discharge to the City's system, thereby utilizing efficient drainage technology (Policy CON-11.4). Finally, all activities involving the handling, storage, and disposal of pesticides used for landscaping would occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste (Policy CON-11.5). Therefore, the Project would not conflict with this goal and associated policy.
Goal CON-12: Storm Drainage Toxicity. A system that minimizes the amount and toxicity of discharge into the storm drain system. **Policy CON-12.2: Permeable Surfaces**. Require the use of landscaping and permeable service treatments in new developments as alternatives to nonpermeable surfaces and explore the feasibility of retrofitting existing large asphalt surfaces in the community such as alleys, parking lots, and driveways into more permeable alternatives. **Policy CON-12.3: Water Quality Standards**. Continue to update and enforce the City's' standards for the quality of stormwater discharged into the system.	**No Conflict.** Project construction would disturb more than one acre of soil and as such the Project would be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In accordance with the requirements of the NPDES Construction General Permit, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth Best Management Practices (BMPs) to be used during construction to manage stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Beverly Hills Stormwater and Urban Runoff Pollution Control Ordinance. The SWPPP would specify BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. These BMPs would be designed to contain stormwater or construction watering on the Project Site such that runoff does not impact off-site drainage facilities or receiving waters. as concluded in the

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
	Hydrology Report, the Project would comply with LID requirements that would address stormwater concerns during operation. Improvements to the Project Site that would treat stormwater include constructing storm drainage infrastructure, including storm drain inlets internal to the site and within the private driveways, to convey on-site runoff to a stormwater treatment system. The proposed stormwater treatment system would consist of an underground rainwater harvesting cistern which would capture the stormwater runoff and then dispose of it via metered discharge to the City's system (Policy CON-12.3). Additionally, the Project would decrease the amount of impervious area on the Project Site from 100 percent to approximately 87 percent as a result of additional stormwater capture that would occur on-site. Specifically, the Project would implement landscape planters and tree wells with substantial soil depth for incidental stormwater treatment, which would be considered pervious areas (Policy CON-12.2). Therefore, the Project would not conflict with this goal and associated policy.
Goal CON-13: Solid Waste Collection and Disposal Operations and Costs. Solid waste services that operate in accordance with the California Integrated Waste Management Act of 1989 (AB 939) and are funded in a manner that reduces the cost of collection and disposal. **Policy CON-13.2: Waste Collection Services**. Maintain adequate solid waste collection for commercial, industrial, and residential developments in accordance with state law.	**No Conflict.** As discussed in the Initial Study prepared for this Project and attached as Appendix A to this Final EIR, the Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would comply with AB 939, AB 341, AB 1826, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Furthermore, the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. In addition, as discussed in the Initial Study, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, the Project would not conflict with this goal and associated policy.
Goal CON-14: Conservation. A solid Waste collection and disposal system that maximizes source reduction, recycling and composting. **Policy CON-14.1: Enforcement of a Recycling Program.** Continue to utilize the Materials Recovery Facility (MRF) as part of a comprehensive recycling program.	**No Conflict.** As discussed in the Initial Study prepared for this Project and attached as Appendix A to this Final EIR, the Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would comply with AB 939, AB 341, AB 1826, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Furthermore, the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Therefore, the Project would not conflict with this goal and associated policy.
Goal CON-16: Waste Reduction. An efficient and innovative waste management program	**No Conflict.** The Project has been designed and would be constructed to incorporate environmentally sustainable

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
that reduces the amount of waste material entering regional landfills. **Policy CON-16.6: Recycled Building Materials.** Encourage the use of recycled building materials wherever possible for new or renovated public and private development. **Policy CON-16.7: Demolition Waste.** Require the recycling of demolition waste for new construction and renovation and projects.	building features and construction protocols required by the Beverly Hills Green Building Code and CALGreen. In particular, the Project would incorporate green construction standards and design consistent with the Leadership in Energy and Environmental Design (LEED) Green Building Rating System with a minimum rating of ~~Silver~~ Gold, including the recycling of a minimum of 50 percent of demolition and construction debris. Therefore, the Project would not conflict with this goal and associated policy.
Goal CON-17: Natural Gas System. Provision of an adequate, safe, and dependable supply of natural gas energy to support existing and future land uses within the City. **Policy CON-17.1: New Development Requirements.** Require that new development is approved contingent upon its ability to be served with adequate natural gas facilities and infrastructure. **Policy CON-17.2: Adequate Facilities**. Coordinate with the Southern California Gas Company to ensure that adequate natural gas facilities are available to meet the demands of existing and future developments, and to encourage conservation techniques.	**No Conflict.** The Project would be adequately served with adequate natural gas facilities and infrastructure through the Southern California Gas Company. Therefore, the Project would not conflict with this goal and associated policies.
Goal CON-18: Electrical Energy System. Provision of an adequate, safe, and dependable supply of electrical energy to support existing and future land uses within the City. **Policy CON-18.1: New Development Requirements.** Require that new development is approved contingent upon the ability to be served with adequate electrical facilities and service. **Policy CON-18.2: Adequate Facilities**. Work with Southern California Edison and the City's Department of Public Works and Transportation to ensure that adequate electrical facilities are available to meet the demand of existing and future development, and to encourage conservation. **Policy CON-18.2: Underground Utilities**. Continue to provide for the undergrounding of new and existing electrical distribution lines	**No Conflict.** The Project would be served with adequate electrical facilities and service through SoCal Edison (Policy CON-18.1). It is noted that the City participates in the Clean Power Alliance, which provides customers with an option to source all or a portion of their electricity from cleaner power sources, including 36 percent, 50 percent or 100 percent renewable energy content. The default renewable energy content provided to Beverly Hills residents is 50 percent (Policy CON-18.2). Furthermore, all new electrical distribution lines would be undergrounded (Policy CON-18.2). Therefore, the Project would not conflict with this goal and associated policies.

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
unless it is determined not to be economically or practically feasible in a particular location as a result of significant environmental or other constraints. Explore innovative funding sources for undergrounding utilities.	
Goal CON-19: Conservation. Provision of affordable and reliable energy resources to residents and businesses that minimize energy consumption. **Policy CON-19.3: Reduced Energy Consumption for Public and Private Facilities**. Install energy efficient appliances and alternative energy infrastructure such as solar energy panels (photovoltaic panels) on all City facilities. Encourage installation of solar energy panels on private development. Develop partnerships with residents to encourage use of solar energy panels and other solar energy technologies.	**No Conflict.** The Project would be served with electrical facilities and service through SoCal Edison. It is noted that the City participates in the Clean Power Alliance, which provides customers with an option to source all or a portion of their electricity from cleaner power sources, including 36 percent, 50 percent or 100 percent renewable energy content. The default renewable energy content provided to Beverly Hills residents is 50 percent. In addition, the Project would incorporate green construction standards and design consistent with the Leadership in Energy and Environmental Design (LEED) Green Building Rating System with a minimum rating of ~~Silver~~ Gold. Specific LEED features that would be incorporated into the Project include, but are not limited to: • Recessed windows, balconies and overhangs to shade window glazing, while allowing reflected and diffuse daylight into the building to enhance the use of natural light and reduce the need for artificial light sources; • Solar ready collectors for 15 percent of the roof area excluding skylight areas for energy efficiency Therefore, the Project would not conflict with this goal and associated policy.
Goal CON-20: **Telecommunication System**. The provision of an adequate, safe, and dependable telecommunication infrastructure to support existing and future land uses within the City **Policy CON-20.6: Undergrounding of Utilities.** Continue to require that utilities be undergrounded in all new development and establish criteria or standards for undergrounding in rehabilitation projects.	**No Conflict.** As discussed in the Initial Study prepared for the Project and attached as Appendix A, the Project would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. AT&T and Spectrum currently provide telecommunication service (cable/internet) to the Project Site. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to main off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers and the City, as applicable. Furthermore, the telecommunication lines would be undergrounded. As such, the Project would not conflict with this goal and associated policies.
Goal CON-24: Prevent the creation of new hazards from unwise grading and drainage	**No Conflict.** The recommendations set forth within the final, design level geotechnical report which will be provided by the geologist of record at Feffer Geological

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

<table>
<tr><th>Goal/Policy</th><th>Would the Project Conflict?</th></tr>
<tr><td>procedures.

Policy CON-24.1: Require all of the recommendations of geologists to be incorporated into the construction plans prior to issuance of a building permit.</td><td>Consulting once final plans for the proposed development are completed, will be incorporated into the Project. Based on the Geotechnical Investigation, a review of the City's General Plan Safety Element, and Fault Investigations completed for each of the four parcels, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone, and no known active faults underlie the Project Site. The Fault Investigations prepared for the Project Site were all reviewed by the City of Beverly Hills Development Services Division and were formally accepted (refer to the last appendix in each of the Fault Investigation reports included in Appendix A of this Final EIR). Therefore, the Project would not conflict with this goal and associated policy.</td></tr>
<tr><td colspan="2">Noise Element</td></tr>
<tr><td>Goal N-1: Land Use Conflicts. Minimize land use conflicts between various noise sources and other human activities.

Policy N-1.5: Noise Mitigation Measures. Require noise mitigation measures for noise-sensitive receptors when a significant noise impact is identified. A significant noise impact occurs when there is an increase in CNEL, as shown in the table below.
<table>
<tr><th>CNEL (dBA)</th><th>dBA Increase</th></tr>
<tr><td>55</td><td>3</td></tr>
<tr><td>60</td><td>2</td></tr>
<tr><td>65</td><td>1</td></tr>
<tr><td>70</td><td>1</td></tr>
<tr><td>Over 75</td><td>1</td></tr>
</table>
</td><td>No Conflict. As further discussed in Section 4.8, Noise, of this Final EIR, noise impacts associated with on-site and off-site construction and operation of the Project would be less than significant. The Project would result in a maximum increase in composite noise levels of 1.3 dBA at noise-sensitive receptor location R2, a single-family residential use on the north side of Parkway. No measurable noise increase would occur at noise-sensitive receptor location R1, the Beverly Hills Presbyterian Church at the northwest corner of Santa Monica Boulevard North and Rodeo Drive. In addition, the maximum estimated noise levels associated with construction of the Project would be below the significance threshold at all off-site noise-sensitive receptor locations. Therefore, no mitigation measures are required, and the Project would not conflict with this goal and associated policy.</td></tr>
<tr><td>Goal N-2: Motor Vehicles. Minimized motor vehicle traffic noise impacts on sensitive noise receptors.

Policy N-2.1: Sensitive Land Uses Adjacent to Heavy Arterials. Require that the design of new residential or other new noise sensitive land uses within the 60 dBA and 65 dBA CNEL (and higher) roadway contours demonstrate that the project will meet interior and exterior noise standards. Require the use of interior noise insulation, double paned windows, or other noise mitigation measures, as appropriate, to achieve required standards.</td><td>No Conflict. As concluded in Section 4.8, Noise, of this Final EIR, the Project's potential impacts from off-site (mobile) sources would be less than significant and would not impact the nearby noise sensitive receptor locations.</td></tr>
<tr><td>Goal N-3: Non-Transportation Noise.</td><td>No Conflict. Amplified entertainment, including live</td></tr>
</table>

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
Minimized non-transportation related noise impacts on sensitive noise receptors. **Policy N-3.1: Protection from Stationary Noise Sources**. Continue to enforce interior and exterior noise standards to ensure that sensitive noise receptors are not exposed to excessive noise levels from stationary noise sources such as machinery, equipment, fans, and air conditioning equipment. **Policy N-3.2: Regulation of Sound-amplifying Equipment.** Continue to regulate the use of sound-amplifying equipment.	music, is proposed at designated indoor and outdoor spaces as an ancillary use in connection with a Hotel, Club and Restaurant uses, subject to Beverly Hills Municipal Code Title 5, Chapter 1, Article 1, and Article 2, Section 5-1-202. Outdoor amplified entertainment will be limited to between the hours of 11:00 A.M. and 11:00 P.M. Furthermore, as discussed in Section 4.8, Noise, of this Final EIR, noise impacts associated with on-site and off-site operation of the Project would be less than significant. Therefore, the Project would not conflict with this goal and associated policies.
Goal N-4: Construction Noise. Minimize excessive construction-related noise. **Policy N-4.1: Enforce Hours of Construction Activity**. Continue to enforce restrictions on hours of construction activity to minimize the impact of noise and vibration from trucks, heavy drilling equipment, and other heavy machinery on adjacent noise-sensitive receptors, particularly in and near residential areas.	**No Conflict.** 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. Per the BHMC, a permit would be required for construction activities outside of the allowed working hours (8:00 A.M. and 6:00 P.M.). As discussed in Section 4.8, Noise, of this Final EIR, noise impacts associated with on-site and off-site construction of the Project would be less than significant. Therefore, the Project would not conflict with this goal and associated policy.
Safety Element	
Goal S-3: Existing and New Development and Redevelopment. All existing and new development and redevelopment address the provision of fire protection in a proactive and preventative manner. **Policy S-3.2: Impacts of New Development.** Assess the impacts of significant increases in development density and intensity, and subsequent impacts on traffic congestion, water infrastructure capacity, fire hazards, and emergency response times. **Policy S-3.3: Fire Protection Services**. Require that new development and re-development of structures provide adequate fire safety features and responder access so as not to cause a reduction of fire protection services below acceptable, safe levels. **Policy S-3.4: Fire Department Access.** Design private and public access drives and roadways to preserve and maintain Fire	**No Conflict.** As previously discussed, the Project would not include housing which would result in a direct increase in the City's population that would be served by the BHFD. However, the Project would result in a net increase of approximately 155,247 square feet to 164,163 square feet (under the Specific Plan maximums) of new floor area on the Project Site and would generate transient occupants (hotel guests) and additional employees. As the Project would increase the building area and daytime and nighttime (transient occupants) population of the Project Site compared to existing conditions, the Project could increase the demand for BHFD services. Notwithstanding, the proposed commercial uses would be expected to generate a range of fire service calls similar to what occurs under existing conditions in the vicinity of the Project Site. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest the Project Site (Policy S-3.2).

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
Department access to properties. **Policy S-3.5: Fire Protection for New and Existing Buildings**. Require all new residential and commercial buildings, all substantial renovations, and all existing buildings having five-stories or exceeding a height of 55-feet, to be equipped with an automatic fire extinguishing system.	Additionally, the Project would be required to comply with the California Fire Code, Universal Building Code, and BHFD standards, including specific construction specifications, access design, location of fire hydrants, and other design requirements, including an automatic fire extinguishing system (Policies S-3.3, S-3.4 and S-3.5). In addition, as concluded by the Alley Study completed by Hirsch Green on April 28, 2020, included in Appendix H of this Final EIR, the relocation of a portion of the public alley currently bisecting the Project Site would not substantially increase hazards or result in an incompatible use. The Alley Study determined that vehicles using the alley, as well as vehicles that are anticipated to use it such as fire trucks and other emergency vehicles, can maneuver the 90-degree turn the relocation would create. Therefore, the Project would not conflict with this goal and associated policies.
Goal S-4: Protection from Flood Hazards. To reduce the potential risk of flood hazards to human life and public and private property. **Policy S-4.1: Flood Mitigation Design**. Require that new development incorporate sufficient measures to mitigate flood hazards, including the design of onsite drainage systems linking with citywide storm drainage, gradation of the site so that runoff does not impact adjacent properties or structures on the site, and elevation of the structures above any flooding elevation. **Policy S-4.2: Permeable Surface Area**. Require the use of permeable surfaces for new development and redevelopment, including alleys and driveways for residential, commercial, and City properties.	**No Conflict.** As provided in the Initial Study included in Appendix A of this Final EIR, the Project Site is not located within a 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA).[9] Thus, the Project would not impede or redirect flood flows. Additionally, runoff would follow new discharge paths and drain to on-site storm drain infrastructure, including storm drain inlets internal to the site and within the private driveways, to convey onsite runoff to a stormwater treatment system before linking with citywide storm drainage (Policy S-4.1). Furthermore, the Project would decrease the amount of impervious area on the Project Site from 100 percent to approximately 87 percent as a result of additional stormwater capture that would occur on-site. Specifically, the Project would implement landscape planters and tree wells with substantial soil depth for incidental stormwater treatment, which would be considered pervious areas (Policy S-4.2). Therefore, the Project would not conflict with this goal and associated policies.
Goal S-5: Protection from Geologic Hazards. To reduce the known level of risk to loss of life, personal injury, public and private property damage, economic and social dislocation, and disruption of vital community services that would result from earthquake	**No Conflict.** All recommendations set forth in a design-level geotechnical report would be incorporated into the Project. In addition, the Project would be designed and construction in accordance with the latest seismic standards. Based on the Geotechnical Investigation included in the Initial Study, a review of the City's General

[9] *Federal Emergency Management Agency, Flood Insurance Rate Maps, Panel Numbers 06037C1320F and 06037C1340F, effective September 26, 2008.*

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?
damage or other geologic disturbance. **Policy S-5.1: Safety Standards**. Require new development and redevelopment to be in compliance with seismic and geologic hazard safety standards, including design and construction standards that regulate land use in areas known to have or to potentially have, significant seismic and/or other geologic hazards.	Plan Safety Element, and Fault Investigations completed for each of the four parcels, the Project Site is not within an Alquist-Priolo Earthquake Fault Zone, and no known active faults underlie the Project Site. The Fault Investigations prepared for the Project Site were all reviewed by the City of Beverly Hills Development Services Division and were formally accepted (refer to the last appendix in each of the Fault Investigation reports included in Appendix A of this Final EIR). Therefore, the Project would not conflict with this goal and associated policy.
Goal S-6: Protection from Hazardous Materials. To ensure that the health, safety and general welfare of residents, visitors and the overall natural environment is protected to the maximum extent feasible from harmful exposure to hazardous materials **Policy S-6.4: Hazardous Materials Regulation.** Enforce current laws requiring all users, producers, and transporters of hazardous materials and waste to clearly identify the materials that they store, use, produce, or transport, and to notify the appropriate City, county, State, and federal agencies in the event of a violation.	**No Conflict.** During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners would be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Furthermore, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. These existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. With regard to operation, the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial uses, including cleaning products, paints, and those used for maintenance of landscaping. Such use would be consistent with that currently occurring at other nearby developments. In addition, as with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with manufacturer's standards and all applicable federal, State, and local requirements. Due to the type of development proposed (e.g., commercial), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site.

Table 4.7-1 (Continued)
Applicable Goals and Policies of the General Plan

Goal/Policy	Would the Project Conflict?

Source: Eyestone Environmental, 2022.

dining character and interest for pedestrians, installing new landscaping and streetscape improvements around the Project Site, and providing the 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. The Project would also provide on-site bicycle parking spaces with charging facilities for e-bicycles, as well as showers and lockers for employees to encourage bicycle commuting. Hotel and club employees who use transit to commute will be provided free transit passes. Thus, the Project would provide opportunities for walking and biking, thereby promoting an improved quality of life and facilitating a reduction in vehicle trips, vehicle miles traveled, and air pollution and supporting Goal LU-14 and Policy LU-14.1 by minimizing consumption of scarce resources, pollution, and greenhouse gas emissions. Additionally, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Beverly Hills Green Building Code and CALGreen, in support of Policies LU-14.2, LU-14.4, and LU-14.5. In particular, the Project would incorporate green construction standards and design consistent with the Leadership in Energy and Environmental Design (LEED) Green Building Rating System with a minimum rating of ~~Silver~~ Gold.

Additionally, the Project would support Policies LU 9.3 and LU 9.4, as the Project would serve as an anchor location appropriate for higher intensity-type development and additional height, and would request an Amendment of General Plan Text, specifically concerning land use policy LU 9.4 Anchor Location Design Criteria in order to do so. The Project Site is large, accessible from major streets and close to other major streets. The unified multiple use commercial development incorporates measures to enhance the street and sidewalks, encouraging pedestrian circulation within the Business Triangle, along North Rodeo Drive, South Santa Monica Boulevard, and North Beverly Drive. These measures include pedestrian supportive uses along the sidewalk with large transparent windows providing views of the Project's Retail and Restaurant uses, large openings at the ground floor restaurant to provide indoor/outdoor dining character and interest for pedestrians, a transparent outer wall of the lobby which will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall, new street trees similar to existing species, landscaped parkways, and other landscape features.

Overall, as detailed in Table 4.7-1 on starting on page 4.7-12, the Project would not conflict with the applicable goals and policies set forth in the Beverly Hills General Plan's Land Use Element adopted for the purpose of avoiding or mitigating an environmental effect.

4.7.3.4.1.1.1.2 Beverly Hills General Plan Historic Preservation Element

As outlined above, the Historic Preservation Element of the General Plan identifies known historic resources in the City, describes State and federal laws pertaining to historic resources, and includes policies aimed to preserving known and newly identified resources. As discussed in detail in Table 4.7-1, the Project would not conflict with the applicable goal and policies of the Historic Preservation Element. Specifically, the Project would not conflict with Goal HP-1 to value and preserve significant cultural resources as the Project would not impact any historical resources. In addition, the Project would not conflict with policies regarding the conservation of archaeological and paleontological resources as the Project would follow the guidance included in the Historic Preservation Element regarding the inadvertent discovery of such resources. In summary, the Project would not conflict with the applicable goal and policies set forth in the General Plan's Historic Preservation Element adopted for the purpose of avoiding or mitigating an environmental effect.

4.7.3.4.1.1.1.3 Beverly Hills General Plan Open Space Element

As outlined above, the Open Space Element of the City's General Plan is the principal guide for the maintenance and conservation of natural resources, open space, and recreation and park lands in the City of Beverly Hills. As evaluated in Table 4.7-1, the Project would not conflict with the relevant goals and policies set forth in the Open Space Element. In particular, the Project would support Goal OS-3 to maintain a strong, healthy, and well-maintained inventory of street trees by replacing the 15 street trees to be removed for the Project at a 1:1 ratio with new street trees. The Project would also support Policy OS-4.1, as part of Goal OS-4, to limit the percentage of impermeable surfaces through the provision of landscape planters and tree wells with substantial soil depth for incidental stormwater treatment. Additionally, the Project would support Goal OS-5 regarding the protection of local watersheds and groundwater resources by complying with all requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Policy OS-5.1). Finally, the Project would support Goal OS-7, improved air quality, through its location in an area well served by a variety of public transit options, its provision of bicycle parking spaces, including charging facilities for e-bicycles, as well as employee lockers and showers to encourage bicycle commuting, and its incorporation of green construction standards and design consistent with the Leadership in Energy and Environmental Design (LEED) Green Building Rating System with a minimum rating of ~~Silver~~ Gold. Overall, the Project would not conflict with the applicable

goals and policies set forth in the General Plan's Open Space Element adopted for the purpose of avoiding or mitigating an environmental effect.

4.7.3.4.1.1.1.4 Beverly Hills General Plan Circulation Element

The Project would not conflict with the relevant goals and policies of the Circulation Element as discussed in detail in Table 4.7-1 on page 4.7-12. The Project would support Goal CIR-1 to provide a safe and efficient roadway circulation system within the City through the promotion of transit ridership, biking, and walking (Policy CIR1.4). Specifically, 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, the Los Angeles County Metropolitan Transit Authority (Metro) serves several transit stops along Santa Monica Boulevard and North Beverly Drive within approximately a ¼ 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. These features would also support Goal CIR-2 to develop a safe, comprehensive, and integrated transit system through the promotion of multi-modal transit (Policy CIR-2.2). Furthermore, the Project would support Goal CIR-6 to promote the movement of people instead of personal automobiles and Goal CIR-8, an integrated, complete, and safe bicycle system, by providing bicycle parking spaces, employee lockers, and showers. The Project would also support Goal CIR-7 for a safe and comfortable pedestrian environment and 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 art, large openings at the ground floor restaurant to provide indoor/outdoor dining character and interest for pedestrians, a transparent outer wall of the lobby which will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall, widening the public sidewalk on South Santa Monica, including amending the Master Plan of Streets, and the improvement of the Project's perimeter with a landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard and street trees and continuous landscaped parkways separating pedestrians from roadway traffic (Policy CIR-7.3). Finally, the Project would support Goal CIR-11, the role of alleys, by safely relocating the portion of the alley that currently bisects the Project Site and is consistent with Policy CIR11.2.c, which provides that Projects involving relocation and/or reconfiguration of alleys in commercial areas may can be considered by the City if such a Project would better serve the City's wider development objectives. Overall, the Project would not conflict with the applicable goals and policies set forth in the General Plan's Circulation Element adopted for the purpose of avoiding or mitigating an environmental effect.

4.7.3.4.1.1.1.5 Beverly Hills General Plan Conservation Element

As analyzed in Table 4.7-1 on page 4.7-12, the Project would not conflict with the relevant goals and policies of the Conservation Element. In particular, the Project would support City goals and policies to decrease site runoff by decreasing the amount of impervious area on the Project Site from 100 percent to approximately 87 percent, that, in conjunction with additional stormwater capture and reuse that would occur on-site, would result in a decrease in the amount of site runoff (Policies CON-1.7 and CON-12.2). The Project would also support Goal CON-2 and Policy CON-2.4 to conserve water by using greywater for irrigation for landscape in areas inaccessible to hotel guests, club members, their respective guests, and the public. As such, the Project would also support Policies CON-2.5, CON-3.9, CON-7.4, and CON-11.4 by installing a water-efficient irrigation system. Furthermore, the Project would support Policy CON-3.5 to limit water runoff through compliance with the City's Urban Runoff Pollution Control Ordinance and implementation of standard erosion controls. Furthermore, the Project would be consistent with the applicable regulations associated with solid waste, including by providing clearly marked, source-sorted receptacles to facilitate recycling (Goals CON-13, CON-14, and CON-16). The Project would also be adequately served with electricity and natural gas services provided by Southern California Edison (SoCal Edison) and the Clean Power Alliance as well as the Southern California Gas Company, respectively, and encourage conservation through measures such as solar ready connectors and electric vehicle charging stations (Goals CON-17, CON-18 and CON-19). Finally, the Project would underground utilities and implement the recommendations of geologists in construction plans, as set forth within the final, design level geotechnical report which will be provided by the geologist of record at Feffer Geological Consulting once final plans for the proposed development are completed (Policies 20.6 and 24.1). In summary, the Project would not conflict with the applicable goals and policies set forth in the General Plan's Conservation Element adopted for the purpose of avoiding or mitigating an environmental effect.

4.7.3.4.1.1.1.6 Beverly Hills General Plan Noise Element

A noise analysis was conducted for the Project in accordance with the City's General Plan Noise Element. During construction activities associated with the Project, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, noise levels from on-site sources may increase during operation of the Project, including from proposed amplified outdoor music. Furthermore, traffic attributable to the Project has the potential to increase noise levels along adjacent roadways. Noise-sensitive uses in the vicinity of the Project Site include residential uses north of N. Santa Monica Boulevard. Based on a review of the land uses in the Project area, two noise sensitive receptor locations were selected to represent nearest noise sensitive uses to the Project Site. These include the Beverly Hills Presbyterian Church at the northwest corner of Santa Monica Boulevard and North Rodeo

Drive and the single-family residential uses on the north side of Parkway. As further discussed in Section 4.8, Noise, of this Final EIR, noise impacts associated with on-site and off-site construction and operation of the Project would be less than significant and no mitigation measures would be required (Goal N-1 and Policy N-1.5). Furthermore, outdoor amplified entertainment will be limited to between the hours of 11:00 A.M. and 11:00 P.M. (Goal N-3 and Policies N-3.1 and N-3.2). Additionally, 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. Per the BHMC, a permit would be required for construction activities outside of the allowed working hours (8:00 A.M. and 6:00 P.M.) (Goal N-4 and Policy N-4.1). Overall, the Project would not conflict with the applicable goals and policies set forth in the General Plan's Noise Element adopted for the purpose of avoiding or mitigating an environmental effect.

4.7.3.4.1.1.7 Beverly Hills General Plan Safety Element

As evaluated in Table 4.7-1 on page 4.7-12, the Project would not conflict with the relevant goals and policies of the Safety Element. The Project would address the provision of fire protection in a proactive and preventative manner through specific construction specifications, access design, location of fire hydrants, and other design requirements, including an automatic fire extinguishing system (Policies S-3.3, S-3.4 and S-3.5). Additionally, the Project would include storm drain inlets internal to the Site and within the private driveways to convey onsite runoff to a stormwater treatment system before linking with citywide storm drainage (Policy S-4.1). Furthermore, the Project would be in compliance with seismic and geologic hazard safety standards, and the Fault Investigations prepared for the Project Site were all reviewed by the City of Beverly Hills Development Services Division and were formally accepted (Policy S-5.1). Finally, the Project would comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials in construction and operation and would therefore support Goal S-6, Protection from Hazardous Materials. Overall, the Project would not conflict with the applicable goals and policies set forth in the General Plan's Safety Element adopted for the purpose of avoiding or mitigating an environmental effect.

4.7.3.4.1.1.2 Beverly Hills Municipal Code

As previously discussed, the Project Site is currently zoned C-3 (Commercial) and is designated as Low Density Commercial in the General Plan Land Use Element. The General Plan provides that the Project Site may be used for general commercial uses, including hotels and ancillary uses. Additionally, the low density commercial designation limits development at the Project Site to a Floor Area Ratio (FAR) density of 2.0:1 and a

height of 45 feet. The Project Conceptual Plans propose to construct a single 212,034-square-foot[10] 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. As such, the Project would exceed current FAR and height limitations applicable to the Project Site. However, the Project also 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 size, height, and density limits and thereby establish conformity of the Project with regard to height and FAR. Under the Cheval Blanc Beverly Hills Specific Plan, proposed development could include up to 220,950 square feet and up to 115 guest rooms. As such, this Final 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.

The proposed Specific Plan identifies a total floor area ratio (FAR) maximum of 4.2:1 and an above ground maximum of 3.91:1. The total FAR calculation for the submitted conceptual plan is 4.03:1 and the above ground maximum is 3.75:1. Measured in conformance with BHMC Title 10, Chapter 3, Article 1, Section 10-3-100, "Height of Building," the Project varies in height from four stories and a maximum height of 51 feet along North Rodeo Drive near the property line to nine stories and a maximum height of 115 feet along North Beverly Drive. Furthermore, the Project would be developed in accordance with the requirements of the Fire Code pertaining to fire safety, as set forth in Beverly Hills Municipal Code Chapter 2.

Based on the parking requirements set forth in the proposed Specific Plan, the Project would require a total of ~~178~~185 vehicle parking spaces. As described in Section 2.0, Project Description, of this Final EIR, the Project is located in a Transit Priority Area and would provide ~~178~~185 vehicle parking spaces for the proposed uses in three subterranean parking levels. The Parking Demand Analysis Study used to determine the number of spaces required analyzed peak parking demand under two methodologies: (i) applying the BHMC, including applicable BHMC-parking credits, in conjunction with the ULI Shared Parking model; and (ii) the parking demand rates, credits and shared parking model supplied by ULI Shared Parking. The maximum number of parking spaces for the Project required by City Code is 282 spaces without parking credits or 192 spaces with parking credits. Additionally, the maximum number of parking spaces for the Project under

[10] *Per the Specific Plan, exterior walls, stair shafts, elevators, elevator lobbies less than 100 square feet per cab, parking spaces and access, maintenance equipment/machinery rooms, outdoor dining areas, decks and balconies, and 2,000 square feet of storage per below grade parking level are not included in the floor area calculations.*

the ULI Shared Parking model would be 156 parking spaces. As concluded in the Parking Study, the proposed supply of ~~178~~185 parking spaces under the Specific Plan would meet the projected peak demand for the Project. Furthermore, any project developed under the Specific Plan shall only comply with the parking requirements provisions, and limitations of the Specific Plan. BHMC Title 10, Chapter 3, Article 28.6, Section 10-3-2866 and Article 27, Sections 10-3-2730 through 10-3-2732, 10-3-2734, 10-3-2736 through 10-3-2742, and 10-3-2744 for parking and loading spaces would not apply to the Specific Plan. Finally, the Project Site is located in an In-Lieu Parking District and contains eligible uses pursuant to BHMC Section 10-3-3301, including General Retail Sales Commercial Activities, Convenience Sale and Service Commercial Uses and Food Sales, and Service Commercial Uses. The Project Site's Retail and other eligible uses would be eligible to participate in the In-Lieu Parking District, subject to the approval of the Director of Community Development as provided for in BHMC Section 10-3-3307, subject to the appeal rights set forth in BHMC Section 10-3-3309. No participation in the In-Lieu Parking District is currently proposed. Furthermore, per Section 21099 (d)(1) of the Public Resources Code (PRC) the project's parking impacts shall not be considered a significant impact on the environment if 1) the project is a residential, mixed-use residential, or employment center project, and 2) the project is located on an infill site within a transit priority area, both of which conditions apply to the Project, as concluded in the Initial Study prepared for the Project and included as Appendix A.

With regard to noise, the estimated noise levels from the outdoor spaces would be 52.4 dBA (L_{eq}) at receptor locations R1 and R2. The estimated composite ambient noise levels with the addition of the noise levels generated by the Project's outdoor spaces would be below the significance criteria of 3 dBA (L_{eq}) above nighttime ambient noise levels (based on the measured ambient noise level) at all off-site receptor locations. As such, noise impacts from the use of the outdoor spaces would be less than significant.

The Project would also not conflict with the City's Municipal Code regarding the removal and replacement of street trees. There are 15 trees that line the sidewalks adjacent to the onsite buildings, including 12 palm trees and 3 Tipuana Tipu/Tipu trees. All of the trees inventoried are of various palm species and legume trees and are not considered protected as defined by Beverly Hills Municipal Code Section 5-6.1001. After obtaining all necessary City approvals, it is anticipated that these existing street trees would be removed during construction of the Project. However, as part of the Project, the trees to be removed would be replaced with new palm trees at a 1:1 ratio.

In addition, on-site grading and site preparation would comply with all applicable provisions of Title 8, Chapter 2 of the Beverly Hills Municipal Code, which addresses grading, excavations, and fills. Furthermore, the Project would be required to comply with the City's Urban Runoff Pollution Control Ordinance and implement standard erosion

controls to limit stormwater runoff, which can contribute to erosion, the potential of which would be negligible since the Project Site would remain fully developed. Additionally, the Project would comply with Beverly Hills Municipal Code Section 9-4-610 which establishes a permitting process and options for dewatering properties. These options include:

- Replenish the ground water basin. The dewaterer will have to adhere to all state and federal laws to implement ground water replenishment.
- Put the water to reasonable and beneficial use on the property. A permit and an annual consumption and usage report will be required for any dewaterer that uses its ground water for beneficial use.
- Deliver the ground water to the City. An agreement will be established between the dewaterer and the City under this option.
- If the first three options are impracticable, obtain a permit and pay a replenishment fee.

In summary, with approval of the requested discretionary actions outlined in Section 2.0, Project Description, of this Final EIR, including the establishment of the Specific Plan, the Project would be generally consistent with and would not conflict with the applicable provisions of the BHMC.

4.7.3.4.1.2 Regional Plans

4.7.3.4.1.2.1 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is discussed in Table 4.7-2 on page 4.7-55. As detailed therein, although these goals apply at a regional rather than a Project level, the Project would not conflict with the applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods and support healthy communities by developing a hotel with commercial retail, and restaurant uses on a Project Site within a designated HQTA that is well served by public transit. As previously discussed, the Project would provide 18 bicycle parking spaces, including charging facilities for e-bicycles, as well as employee lockers and showers. 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., biking, public transit) and reduce dependency on

Table 4.7-2
Applicable Goals of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)

Goals	Would the Project Conflict?
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods. **Goal 4:** Increase person and goods movement and travel choices within the transportation system.	**No Conflict.** The Project would be developed in an existing urbanized area with an established network of roads and freeways that provide local and regional access, including to the Project Site. The Project Site is well served by a variety of public transit options, including local and regional bus lines. In particular, Metro serves several transit stops along Santa Monica Boulevard and North Beverly Drive within approximately a ¼ 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. In addition, the Project would provide a minimum of 18 bicycle parking spaces, including charging facilities for e-bicycles, as well as employee lockers and showers to encourage bicycle commuting. Given the Project's location in proximity to a variety of transportation options, the Project would maximize mobility, accessibility, and overall productivity of the transportation system by providing various opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking. With respect to safety, as discussed in Section 4.9, Transportation, of this Final EIR, the roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. The Project Site is located in a highly urbanized area developed with roadways and infrastructure. All access and circulation associated with the Project would be designed and constructed in conformance with all applicable City requirements. The Project would not include any new roads that would result in an increase in hazards due to a design feature, and the Project's driveways would be designed in accordance with City requirements. In addition, the Project would not result in incompatible uses as the proposed commercial uses are consistent with the surrounding commercial developments in the Project vicinity. Furthermore, during construction, the Project would prepare and implement a Construction Traffic Management Plan to minimize potential impacts to the surrounding area related to construction trucks, construction worker parking, and any possible sidewalk or lane closures and to ensure safe passage for all modes of travel during Project construction. In addition, during operation, landscape design will ensure there will be no impediments to visibility of and by vehicles, bicycles and pedestrians. Furthermore, as concluded in Section 4.9,

Table 4.7-2 (Continued)
Applicable Goals of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)

Goals	Would the Project Conflict?
	Transportation, of this Final EIR, the Project would not substantially increase hazards due to a geometric design feature or incompatible use. Moreover, the Project would result in less-than-significant impacts with respect to VMT and conflicts with programs, plans, policies, and ordinances addressing the circulation system. Therefore, the Project would not conflict with these goals.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict.** The Project would not conflict with its implementation. As discussed in Section 4.9, Transportation, of this Final EIR, the Project would result in less-than-significant impacts with respect to conflicts with programs, plans, policies, and ordinances addressing the circulation system; VMT; and hazardous geometric design features. As discussed above, during construction, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure that emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. During operation, the Project would not substantially increase hazards due to a geometric design feature or incompatible use. Therefore, the Project would not affect the security and preservation of the regional transportation system, and the Project would not conflict with these goals.
Goal 5: Reduce greenhouse gas emissions and improve air quality. **Goal 6:** Support healthy and equitable communities. **Goal 7:** Adapt to a changing climate and support an integrated regional development pattern and transportation network	**No Conflict.** As evaluated in Section 4.1, Air Quality, of this Final EIR, the Project would result in less-than-significant impacts related to air quality during construction and operation. As evaluated in Section 4.6, Greenhouse Gas Emissions, of this Final EIR Project impacts with respect to GHG emissions would be less than significant. As also discussed therein, the Project would comply with regulatory requirements and LEED ~~Silver~~ Gold or equivalent green building standards. Specific project design features to further support and promote environmental sustainability would include, but would not be limited to: recessed windows, balconies and overhangs to shade window glazing, while allowing reflected and diffuse daylight into the building to enhance the use of natural light and reduce the need for artificial light sources; landscaping and exterior design utilizing subterranean parking and landscaped and shaded non-roof surfaces, light-colored, low-albedo roof surfaces to reduce local heat island effects; the reduction of chlorofluorocarbons (CFCs) from the building systems; the selection of materials, such as adhesives, sealants,

Table 4.7-2 (Continued)
Applicable Goals of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)

Goals	Would the Project Conflict?
	paints, and carpeting, that reduce off-gassing to improve internal air quality; installation of electric vehicle charging equipment and bicycle parking, including charging facilities for e-bicycles, as well as employee lockers and showers; recycling of a minimum of 50 percent of demolition and construction debris; and the use of greywater for irrigation for landscape in areas inaccessible to hotel guests, club members, their respective guests and the public. The Project would also include the installation of solar-ready collectors as required by Title 24 which would reduce GHG emissions associated with electricity production. While these measures are intended to reduce GHG emissions, they would also improve air quality. The Project would be developed within an existing urbanized area that provides an established transportation network of roads, freeways, and transit that provide local and regional access to the area, including the Project Site. As discussed above, the Project area is well served by a variety of public transit options, including local and regional bus lines. The Project would also promote bicycle use through the provision of 18 bicycle parking spaces, including charging facilities for e-bicycles, as well as employee lockers and showers. In addition, the Project would enhance pedestrian activity on and around the Project Site by siting retail and restaurant uses on the ground level and creating a publicly accessible pedestrian plaza at North Rodeo Drive and South Santa Monica Boulevard that would be contiguous with the sidewalk and include private artwork, which would serve to activate the streets and promote walkability. Additionally, large openings at the ground floor restaurant would provide indoor/outdoor dining character and interest for pedestrians and the transparent outer wall of the lobby will provide visual access for pedestrians to a large fine art mural installed at the back lobby wall. Widening the public sidewalk on South Santa Monica, dedicating additional property to the public right of way and amending the Master Plan of Streets, and the improvement of the Project's perimeter with a landscaped trellis-like porte cochere covering the motor court adjacent to South Santa Monica Boulevard, street trees and continuous landscaped parkways separating pedestrians from roadway traffic, would further contribute to a pedestrian-friendly environment. As such, the Project would support the protection of the environment and health of residents by improving air quality and encouraging active transportation. The Project would support the reduction of vehicle miles traveled and

Table 4.7-2 (Continued)
Applicable Goals of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS)

Goals	Would the Project Conflict?
	dependency on single-occupancy vehicles. As such, the Project would not conflict with the region's adaptation to a changing climate and would support an integrated regional development pattern and transportation network. Therefore, the Project would not conflict with these goals.
Goal 8: Leverage new transportation technologies and data-driven solutions that results in more efficient travel.	**No Conflict.** As discussed above, the Project would promote non-auto travel and reduce the use of single-occupant vehicle trips by being located in a transit-rich area, providing bicycle parking, including charging facilities for e-bicycles, as well as employee lockers and showers, and improving the pedestrian environment. The Project would also provide parking spaces that are equipped with EV charging stations. Therefore, the Project would not conflict with these goals.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	**No Conflict.** As discussed in the Initial Study included as Appendix A of this Final EIR, the Project Site is located in an urbanized area and is currently partially improved with existing commercial and institutional uses. The entire Project Site is paved, and no trees are present on-site. There are 15 trees that line the sidewalks adjacent to the onsite buildings, including 12 palm trees and 3 Tipuana Tipu/Tipu trees. All of the trees inventoried are of various palm species and legume trees and are not considered protected trees as defined by Beverly Hills Municipal Code Section 5-6.1001. No riparian or other sensitive natural community exists on-site, and no agricultural uses or operations occur on-site or in the vicinity. The Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the California Department of Conservation. Furthermore, the Project site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles. Accordingly, development of the Project would not preclude the conservation of natural and agricultural lands and restoration of habitats. Thus, the Project would not conflict with this goal.
Source: Eyestone Environmental, 2022.	

single-occupancy vehicles. Therefore, the Project would not conflict with the applicable goals, objectives, and policies of the 2020–2045 RTP/SCS.

4.7.3.4.1.2.2 South Coast Air Quality Management District Air Quality Management Plan

As analyzed in Section 4.1, Air Quality, of this Final EIR, the Project would not conflict with the applicable policies set forth in the SCAQMD's AQMP.

4.7.3.4.1.3 Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project would not conflict with the goals and policies in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to conflicts with applicable plans, policies, and regulations would be less than significant.

4.7.3.4.2 Mitigation Measures

The Project's impact related to conflicts with applicable land use plans would be less than significant. Therefore, no mitigation measures are required.

4.7.3.4.3 Level of Significance After Mitigation

Project-level impacts related to conflicts with land use plans were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

4.7.3.5 Cumulative Impacts

4.7.3.5.1 Impact Analysis

As indicated in Section 3.0, Environmental Setting, of this Final EIR, there are a total of 24 related projects identified within the City of Beverly Hills, 6 related projects identified within the City of Los Angeles, and 17 related projects identified within the City of West Hollywood. Cumulative growth in the greater Project area includes these known development projects as well as general ambient growth projected to occur, as described in Section 3.0, Environmental Setting, of this Final EIR. These related projects primarily include retail/commercial, residential, office, institutional, and hotel uses.

Like the Project, the related projects generally consist of infill development and redevelopment of existing uses, which is encouraged by the land use policies for the Beverly Hills General Plan. As with the Project, the related projects would be required to comply with relevant land use policies and regulations through City review and would be subject to CEQA review. Therefore, the Project and the related projects would not have cumulatively significant land use impacts. In addition, as analyzed above, as the Project would be consistent and would not conflict with applicable land use plans and zoning standards, the Project would not incrementally contribute to cumulative inconsistencies with

respect to land use plans and zoning standards. **Cumulative impacts with regard to conflict with land use plans would not be cumulatively considerable, and cumulative impacts would be less than significant.**

4.7.3.5.2 Mitigation Measures

Cumulative impacts related to land use and planning would be less than significant. Thus, no mitigation measures would be necessary.

4.7.3.5.3 Level of Significance After Mitigation

Cumulative impacts related to land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.