

The Morrison Project

Case Number: ENV-2018-2294-EIR

Project Location: 1220-1246 South Hope Street, Los Angeles, California, 90015

Community Plan Area: Central City

Council District: 14—Huizar

Project Description: The Project consists of the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the adaptive reuse of an existing 46,626 square-foot, single-resident occupancy (SRO) hotel (“Phase I Existing”), the expansion of the existing hotel with the new construction of an approximately 102,706 square-foot hotel (“Phase I Expansion”), and the new construction of an approximately 273,106 square-foot, mixed-use hotel and residential building (“Phase II Hotel and Residential Tower”). The total floor area of the Project would be approximately 422,438 square feet, with 135 dwelling units and 450 guest rooms. The Project would also include a 3,060 square-foot basement bar and lounge, 15,891 square feet of ground floor restaurant and retail space, 10,415 square feet of ground floor hotel and residential lobby space, 14,052 square feet of event and meeting room space, and 39,199 square feet of amenity spaces. The Project includes 215 parking spaces to be located within three levels of subterranean parking.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

EcoTierra Consulting, Inc.

APPLICANT:

Morrison Hotel, LLC and Morrison Residential, LLC

INITIAL STUDY

TABLE OF CONTENTS

	<u>Page</u>
Introduction	5
Executive Summary	9
Project Description	14
1. Project Summary	14
2. Environmental Setting	14
3. Description of Project	17
4. Requested Permits and Approvals	24
Evaluation of Environmental Impacts.....	62
I. Aesthetics	62
II. Agriculture and Forestry Resources	68
III. Air Quality	70
IV. Biological Resources.....	73
V. Cultural Resources	76
VI. Energy	78
VII. Geology and Soils	80
VIII. Greenhouse Gas Emissions	86
IX. Hazards and Hazardous Materials.....	87
X. Hydrology and Water Quality	93
XI. Land Use and Planning	98
XII. Mineral Resources	99
XIII. Noise	100
XIV. Population and Housing	102
XV. Public Services	103
XVI. Recreation	108
XVII. Transportation	110
XVIII. Tribal Cultural Resources.....	112
XIV. Utilities and Service Systems.....	114
XX. Wildfire.....	117
XXI. Mandatory Findings of Significance	119

Appendix

- A. Arborist Tree Report
- B. Preliminary Geotechnical Engineering Investigation
- C. Methane Investigation
- D. Phase I and Phase II Environmental Site Assessments

List of Figures

2-1	Regional Vicinity and Project Location Map	26
2-2	Project Site and Transit Priority Area	27
2-3	Plot Plan	28
2-4	Floor Plan – Level B3	29
2-5	Floor Plan – Level B2	30
2-6	Floor Plan – Level B1	31
2-7	Floor Plan – Level 1.....	32
2-8	Floor Plan – Level 2.....	33
2-9	Floor Plan – Level 3.....	34
2-10	Floor Plan – Level 4.....	35
2-11	Floor Plan – Levels 5 & 6	36
2-12	Floor Plan – Level 7.....	37
2-13	Floor Plan – Level 8.....	38
2-14	Floor Plan – Level 9.....	39
2-15	Floor Plan – Levels 10 & 11	40
2-16	Floor Plan – Level 12.....	41
2-17	Floor Plan – Level 13.....	42
2-18	Floor Plan – Levels 14.....	43
2-19	Floor Plan – Levels 15-25	44
2-20	Floor Plan – Level 26.....	45
2-21	Floor Plan – Level 27.....	46
2-22	West Elevation.....	47
2-23	East Elevation.....	48
2-24	North Elevation	49
2-25	South Elevation	50
2-26	Project Rendering.....	51
2-27	Project Rendering.....	52
2-28	Landscape Plan – Level 1	53
2-29	Landscape Plan – Level 2	54
2-30	Landscape Plan – Level 3	55
2-31	Landscape Plan – Level 13	56
2-32	Landscape Plan – Level 14	57
2-33	Landscape Plan – Level 27	58
2-34	Landscape Plan – Planting Palette	59
2-35	Landscape Plan – Inspiration Images	60
2-36	Exterior Materials.....	61
3-1	Parks and Recreational Facilities within Two-Mile Radius	107

List of Tables

2-1	Project Demolition Summary	17
2-2	Project Development Summary.....	18
2-3	Required Vehicle Parking for the Project	21
2-4	Bicycle Parking Required by the Project	22
2-5	Vehicle Parking Provided by the Project	23
3-1	LAUSD Schools Serving the Project Site.....	104
3-2	Estimated Project Student Generation.....	105

INITIAL STUDY

1 INTRODUCTION

An application for the proposed Morrison Project (“Project”) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study (IS) evaluates potential environmental effects resulting from construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study and EIR is intended as an informational document and is ultimately required to be adopted by the decision-making body prior to Project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project’s approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.¹

¹ State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: “(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project’s effects were adequately examined by an earlier EIR or negative declaration.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for the proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the lead agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the lead agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-

day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues are prepared.

1.3.3 Final EIR

The lead agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving a project for which an EIR has been prepared, the lead agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring and reporting program to ensure that all proposed mitigation measures are implemented.

If the Project is approved, then within five days of the action, the City files a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	THE MORRISON PROJECT
ENVIRONMENTAL CASE NO.	ENV-2018-2294-EIR
RELATED CASES	ZA-2018-2293-MCUP-CUX-DD-SPR

PROJECT LOCATION	1220-1240 SOUTH HOPE STREET, LOS ANGELES, CA 90015
COMMUNITY PLAN AREA	CENTRAL CITY
GENERAL PLAN DESIGNATION	HIGH DENSITY RESIDENTIAL
ZONING	[Q]R5-4D-O
COUNCIL DISTRICT	14—HUIZAR

LEAD CITY AGENCY	CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING
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APPLICANT	MORRISON HOTEL, LLC AND MORRISON RESIDENCES, LLC C/O RICHARD HEYMAN
ADDRESS	1605 CAHUENGA BOULEVARD LOS ANGELES, CA 90028
PHONE NUMBER	(323) 466-1400

PROJECT DESCRIPTION

The Project consists of the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the adaptive reuse of an existing 46,626 square-foot, single-resident occupancy (SRO) hotel (“Phase I Existing”), the expansion of the existing hotel with the new construction of an approximately 102,706 square-foot hotel (“Phase I Expansion”), and the new construction of an approximately 273,106 square-foot, mixed-use hotel and residential building (“Phase II Hotel and Residential Tower”). The total floor area of the Project would be approximately 422,438 square feet, with 135 dwelling units and 450 guest rooms. The Project would also include a 3,060 square-foot basement bar and lounge, 15,891 square feet of ground floor restaurant and retail space, 10,415 square feet of ground floor hotel and residential lobby space, 14,052 square feet of event and meeting room space, and 39,199 square feet of amenity spaces. The Project includes 215 parking spaces to be located within three levels of subterranean parking.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

ENVIRONMENTAL SETTING

The Project Site is located in a highly developed urban neighborhood at the intersection of South Hope Street and Pico Boulevard in the South Park neighborhood of the Central City Community Plan area, approximately 500-feet east of the Los Angeles Metropolitan Transportation Authority’s light-rail train (LRT) station at Pico Boulevard and Flower Street. The Site is zoned [Q]R5-4D-O, for High Density Residential in Height District 4 with a “D” Development Limitation and in an Oil Drilling Overlay, and is currently developed with four commercial buildings, ranging in height from two- to four-stories, including the existing four-story Morrison Hotel, a single-room occupancy (SRO) hotel with 111 rooms. The Site is located in a Transit Priority Area (TPA), the Greater Downtown Housing Incentive Area, the Los Angeles State Enterprise Zone, and the City Center Redevelopment Plan Project Area.

The land uses within the general vicinity are characterized by a mix of low- to medium-intensity industrial, commercial, and residential uses, which vary widely in building style and period of construction. The surrounding properties include industrial, commercial retail, residential, and surface parking lots. Specifically, the Project Site is bounded by a commercial industrial building to the north, an alley, mixed-use residential, commercial, and surface parking to the east, Pico Boulevard and mixed-use residential to the south, and Hope Street and commercial industrial and surface parking to the west. Properties in the surrounding area are designated and zoned R5 for Multiple Dwelling Zone and C2 for Commercial Zone.

(For additional detail, see “Section 3. PROJECT DESCRIPTION”).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g. permits, financing approval, or participation agreement)

None.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Outreach to California Native American tribes traditionally and culturally affiliated with the Project area began on December 12, 2018. During the notification period, the Gabrieleño Band of Mission Indians – Kizh Nation responded and requested consultation with the City. Consultation with this tribe occurred on December 12, 2018. The tribe identified potential tribal cultural resources and provided recommended mitigation measures that are included in the environmental analysis for this resource category and will be further analyzed in an EIR to determine the impact level of significance in compliance with CEQA.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|---|---|--|
| <input type="checkbox"/> Aesthetics | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Hydrology / Water Quality | <input checked="" type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Land Use / Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Utilities / Service Systems |
| <input checked="" type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input checked="" type="checkbox"/> Geology / Soils | <input checked="" type="checkbox"/> Population / Housing | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☒ I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Mindy Nguyen
PRINTED NAME

City Planner
TITLE

SIGNATURE

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project consists of the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the adaptive reuse of an existing 46,626 square-foot, single-resident occupancy (SRO) hotel (“Phase I Existing”), the expansion of the existing hotel with the new construction of an approximately 102,706 square-foot hotel (“Phase I Expansion”), and the new construction of an approximately 273,106 square-foot, mixed-use hotel and residential building (“Phase II Hotel and Residential Tower”). The total floor area of the Project would be approximately 422,438 square feet, with 135 dwelling units and 450 guest rooms. The Project would also include a 3,060 square-foot basement bar and lounge, 15,891 square feet of ground floor restaurant and retail space, 10,415 square feet of ground floor hotel and residential lobby space, 14,052 square feet of event and meeting room space, and 39,199 square feet of amenity spaces. The Project includes 215 parking spaces to be located within three levels of subterranean parking.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site is located in a highly developed urban neighborhood at the intersection of South Hope Street and Pico Boulevard in the South Park neighborhood of the Central City Community Plan (“Community Plan”) area (See Figure 2-1, Vicinity and Regional Map). The Project Site consists of five contiguous lots associated with Assessor Parcel Numbers 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-021 (the “Project Site”). The relatively flat Project Site is approximately 56,325 square feet (1.29 acres) in size and bound by a commercial industrial building to the north, an alleyway to the east, Pico Boulevard to the south, and Hope Street to the west (see Figure 2-1, Regional Vicinity and Project Location).

Regional access to the area of the Project Site is provided by the Santa Monica Freeway (I-10) via Olive Street approximately 0.23 miles to the south and the Harbor Freeway (SR-110) via 9th Street, approximately 0.6 miles to the northwest. Local access to the Project Site is provided via Hope Street and Pico Boulevard. The Los Angeles County Metropolitan Transportation Authority (“Metro”) and City of Los Angeles Department of Transportation (LADOT) provide regional light rail and local bus service in the Project Site area, respectively. The Pico Station serving the Metro light rail Blue and Expo lines is less than 500 feet west of the Project Site on Flower Street north of Pico Boulevard. In addition, Metro runs multiple bus lines, including local and rapid lines, along Pico Boulevard with stops at Grand Avenue, Flower Street, and Figueroa Street.

3.2.2 Existing Conditions

The Project Site comprises five (5) parcels along the southwest side of the block bounded by 12th Street to the north, Grand Avenue to the east, Pico Boulevard to the south, and Hope Street to the west. The Project Site is currently developed with two one-story and one two-story commercial industrial buildings fronting Hope Street built around 1918; the four-story Morrison Hotel, built in 1914 at the corner of Hope Street and Pico Boulevard; and an associated surface parking lot adjacent to the Morrison Hotel containing 32 parking spaces and comprised of approximately 56,325 square feet. The three commercial industrial buildings on the Project Site are currently used as office/warehouse buildings. The Morrison Hotel has 111 SRO units and has been unoccupied since 2008.² SurveyLA identified the Morrison Hotel as eligible for listing in the California Register and for designation as a Historic Cultural Monument (HCM). The survey found the Morrison Hotel to be significant as an “excellent example of a 1910s hotel in Downtown Los Angeles, exhibiting essential characteristics of the property type; reflects early patterns of commercial development in Los Angeles’ central business district. The building was immortalized on the album cover of The Doors’ 1970 album *Morrison Hotel*,”³ but that the building does not retain sufficient integrity for listing in the National Register due to alterations, including storefront modifications and window infill.⁴

The Project Site has a General Plan land use designation of High Density Residential under the Central City Community Plan. The Los Angeles Municipal Code (LAMC) establishes the zoning for the Project Site as [Q]R5-4D-O, for High Density Residential in Height District 4 with “Q” Qualified Conditions and a “D” Development Limitation, pursuant to Ordinance No. 164307-SA3030, within an Oil Drilling Overlay.

Pursuant to LAMC § 12.21 A.18, uses permitted in the C2 zone are permitted on lots zoned R5 within the Central City Community Plan area. Thus, hotel, restaurant, retail, and multi-family dwelling unit developments are permitted uses within the R5 Zone.

The Q Condition on the Project Site limits the permitted uses to: (i) residential uses permitted in the R5 Zone; (ii) hotels, motels, and apartment hotels; (iii) parking buildings, provided such parking is accessory to the main use of the lot; (iv) any other uses permitted in the C4 Zone within buildings which were in existence on the lot upon the effective date of this ordinance; (v) any other use permitted in the C4 Zone provided the floor area ratio of such use does not exceed 2:1; and (vi) any other uses permitted in the C4 Zone

² The Applicant intends to coordinate with the Community Redevelopment Agency of Los Angeles to provide replacement units on a one-to-one basis consistent with the Wiggins Settlement Agreement and Development Guidelines and Controls for Residential Hotels in the City Center and Central Industrial Redevelopment Project Areas.

³ Architectural Resources Group, "Historic Resources Survey Report: Central City Community Plan Area," SurveyLA Los Angeles Historic Resources Survey (City of Los Angeles Office of Historic Resources, May 2016), Appendix A: Individual Resources, page 69.

⁴ Architectural Resources Group, "Historic Resources Survey Report: Central City Community Plan Area," SurveyLA Los Angeles Historic Resources Survey (City of Los Angeles Office of Historic Resources, May 2016), Appendix A: Individual Resources, page 69.

provided the development plan is approved by the City Planning Commission and California Redevelopment Agency.

The D Limitation on the site restricts the Floor Area Ratio (FAR) to 6:1 unless: (i) the project is approved under Section 512.4 for the transfer of floor area (TFAR) under the City Center Redevelopment Plan (“Redevelopment Plan”); (ii) the project is approved under Section 512.2 of the Redevelopment Plan for the rehabilitation and/or remodeling of existing buildings; or (iii) the project is approved pursuant to any TFAR procedure adopted by the City. Section 512.2 states that “[n]otwithstanding the maximum Floor Area Ratios [...] structures which existed in the Project Area prior to the adoption of this Plan may be expanded in size in connection with the rehabilitation or remodeling of such structures.” This Section further provides that if the existing structure has an FAR of less than 6:1, then the expansion is limited to no more than 25 percent above the maximum FAR, or 7.5:1.

The Project Site is also located in the Greater Downtown Housing Incentive Area (Zoning Information Bulletin (ZI) 2385), the Los Angeles State Enterprise Zone (ZI-2374), and the City Center Redevelopment Plan Project Area, the Adaptive Reuse Incentive Area (ARIA), Central City Parking District (CCPD), and the Downtown Business District (DBD).⁵ Pursuant to ZI 2385, as part of the Greater Downtown Housing Incentive Area (GDHIA), the permissible density of the Project is unlimited.

The Project is located within a Transit Priority Area (TPA) pursuant to Senate Bill 743, due to its proximity to a “major transit stop” as defined in Public Resources Code Section 21064.3. SB 743 defines a TPA as an area within one-half mile of a major transit stop that is existing or planned. A major transit stop is a site containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the AM and PM peak commute periods. An infill site refers to a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. As shown on Figure 2-2, Project Site and Transit Priority Area, the Project Site is within a TPA.⁶

3.2.3 Surrounding Land Uses

The Project Site is located in downtown Los Angeles, in an area that has been developed since the late 1800s. The Project Site has frontage along Hope Street and Pico Boulevard. The land uses within the general vicinity are characterized by a mix of low- to medium-intensity industrial, commercial, and residential uses, which vary widely in building style and period of construction. The surrounding properties include industrial, commercial

⁵ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2018.

⁶ City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>. Accessed April 4, 2019.

retail, residential, and surface parking lots. The properties in the surrounding area are zoned R5 and C2.

The Project Site is bound by a commercial industrial building to the north; an alleyway, mixed-use residential, commercial, and a surface parking to the east; Pico Boulevard and mixed-use residential to the south; and Hope Street, commercial industrial uses, and a surface parking to the west (see Figure 2-1, Regional Vicinity and Project Location).

For the street segments that abut the Project Site, Hope Street is classified as an Avenue II and Pico Boulevard is classified as an Avenue I in the City's Mobility Plan 2035.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project consists of the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the adaptive reuse of an existing 46,626 square-foot SRO hotel ("Phase I Existing"), the expansion of the existing hotel with the new construction of an approximately 102,706 square-foot hotel ("Phase I Expansion"), and the new construction of approximately 273,106 square-foot, mixed-use hotel and residential building ("Phase II Hotel and Residential Tower"). The total floor area of the Project would be approximately 422,438 square feet, with 135 dwelling units and 450 guest rooms. The Project would also include a 3,060 square-foot basement bar and lounge, 15,891 square feet of ground floor restaurant and retail space, 10,415 square feet of ground floor hotel and residential lobby space, 14,052 square feet of event and meeting room space, and 39,189 square feet of amenity spaces. The Project includes 215 parking spaces to be located within three subterranean levels. A Conceptual Site Plan is shown on Figure 2-3, Plot Plan, and floor plans are shown on Figures 2-4 through 2-21 and elevations are shown on Figures 2-22 through 2-25. Table 2-1, Project Demolition Summary, summarizes the land uses that would be demolished by the Project, and Table 2-2, Project Development Summary, summarizes the proposed land uses.

**Table 2-1
Project Demolition Summary**

Address	Existing Land Use	APN	Amount
1220 South Hope Street	Commercial Industrial	5139022003	9,300 sf
1224 South Hope Street	Commercial Industrial	5139022004	7,750 sf
1240 South Hope Street	Commercial Industrial	5139022020	15,500 sf
427 West Pico Boulevard	Surface Parking Lot	5139022021	9,461sf
<i>sf = square feet</i> <i>Source: EcoTierra Consulting, May 2018.</i>			

**Table 2-2
Project Development Summary**

Land Use	Size
Hotel Rooms	
Existing Hotel – Phase I (Adaptive Reuse)	69 rm
New Construction – Phase I Expansion	231 rm
New Construction – part of Phase II Hotel and Residential Tower	150 rm
Total Hotel Rooms	450 rm
Residential Units - part of Phase II Hotel and Residential Tower	
1 bedroom	60 du
2 bedrooms	72 du
3 bedrooms (Penthouse units)	3 du
Total Residential Units	135 du
Provided Open Space	
Common Open Space	11,450 sf
Recreation Room	2,167 sf
Private Open Space (Balconies)	3,750 sf
Total Open Space	17,367 sf
Commercial and Amenity Space	
Hotel Lobby	9,105 sf
Hotel Bar / Lounge	3,060 sf
Hotel Retail / Restaurant #1	7,466 sf
Hotel Restaurant #2	6,600 sf
Retail	1,825 sf
Residential Lobby	1,310 sf
Event/Ballroom	6,855 sf
Amenity Terrace (2 nd Floor, uncovered)	2,203 sf
Meeting Space (2 nd floor)	1,232 sf
Amenity (2 nd floor, covered)	7,806 sf
Amenity (3 rd floor, covered)	3,225 sf
Amenity Terrace (3 rd floor, uncovered)	6,267 sf
Meeting Space (13 th floor)	5,965 sf
Amenity Terrace (13 th floor, uncovered)	3,121 sf
Amenity Terrace (13 th floor, covered)	2,907 sf
Club Room	559 sf
Amenity Terrace (14 th floor, uncovered)	5,383 sf
Amenity Terrace (14 th floor, covered)	1,443 sf
Amenity Terrace (27 th floor, uncovered)	2,938 sf
Amenity Terrace (27 th floor, covered)	940 sf
Resident Lounge (27 th floor)	2,407 sf
Total Commercial and Amenity Space (excluding rooms and units)	82,617 sf
<i>du = dwelling units; rm = rooms; sf = square feet Source: Steinberg Architects, March 2019.</i>	

The Project's development of Phase I Existing, located at the southwestern portion of the Project Site, would adaptively reuse the existing four-story Morrison Hotel, with the hotel lobby fronting Hope Street, and approximately 6,600 square feet of ground floor restaurant

use at the corner of Hope Street and Pico Boulevard. Phase I Existing would also include a bar/lounge in the basement level along Hope Street and 69 hotel guest rooms on Levels 2 through 4. Phase I Existing would remain four stories overall with a maximum height of 52 feet above grade.

Phase I Expansion, located at the southeastern portion of the Project Site, would include 1,825 square feet of retail space along Pico Boulevard and provide 231 hotel guest rooms on Levels 2 through 12, meeting space on Level 13, and covered and uncovered amenity space with a pool on Level 14. Phase I Expansion would be 14 stories with a maximum height of 172 feet above grade.

Phase II Hotel and Residential Tower, located on the northern portion of the Project Site, would include 7,466 square feet of ground floor commercial restaurant and retail space along Hope Street. Phase II Hotel lobby entrance would front Hope Street and the residential lobby would be accessible along the internal vehicular driveway at the northern portion of the Project Site. Level 2 of the Phase II Hotel and Residential Tower would include an outdoor amenity terrace along Hope Street, event/meeting space, and hotel amenities. Levels 3 through 8 would include 150 hotel guest rooms, with an additional 3,225 square feet of amenity space located on Level 3. Levels 9 through 27 would include 135 residential units, with a terrace, pool, and club room located on Level 13 and a terrace, pool, and resident lounge provided on Level 27. The Phase II Hotel and Residential Tower would be 27 stories with a maximum height of 315 feet above grade.

A public paseo would provide mid-block pedestrian access from Hope Street to the existing alleyway and include outdoor seating and landscaping. The paseo would be open to the sky and connect the proposed outdoor dining areas with the indoor dining, retail, and lobby spaces. Vehicular access would be provided off of Hope Street and from the existing alley. Overall, the Project proposes a Floor Area Ratio (FAR) of 7.5:1.

The Project Applicant is requesting a Vesting Tentative Tract Map (VTT), Site Plan Review (SPR), Master Conditional Use Permit for Alcohol (MCUP), Conditional Use Permit for Live Entertainment (CUX), and a 20-percent reduction in required parking in conjunction with the Applicant's Conditional Use Permit requests. See Requested Permits and Approvals discussion below for more information regarding the discretionary requests that are part of the Project.

3.3.2 Design and Architecture

The buildings in the area of the Project Site vary in age and architectural style. The Project would reuse and rehabilitate the existing Morrison Hotel, built in 1914, while expanding and constructing a new building on the block in a contemporary architectural style. As the Project is located within the South Park community of downtown Los Angeles, the Proposed Project buildings have been designed to be compatible with the urban nature of the existing community, which includes new and old industrial, residential, and general commercial uses in buildings varying from one level to skyscrapers. Conceptual renderings of the Project can be seen on Figures 2-26 and 2-27, Project Renderings, which include views of the Project in context with its surroundings.

Although the Project is comprised of two buildings, the articulation of each of the buildings serves to resemble multiple buildings with heights which step down toward Hope Street.

The Project includes an outdoor second floor deck along Hope Street and several green walls at varying levels. The design of the Project building facades alternates between different textures, colors, materials, and distinctive architectural treatments. See Figure 2-36, Exterior Materials, for various materials proposed for the Project exterior.

3.3.3 Open Space and Landscaping

Based on the total number of residential units proposed, the Project is required to provide 15,525 square feet of open space pursuant to LAMC Section 12.21 G.2. The Project would meet this requirement by providing 11,450 square feet of outdoor common open space located on Level 1 (approximately 4,451 square feet of outdoor seating and landscaping), on Level 13 (approximately 3,121 square feet of outdoor terrace space with swimming pool and spa), and Level 27 (approximately 3,878 square feet of terrace space); 2,167 square feet of interior common open space via a recreation room located on Level 27; and 3,750 square feet of private residential balconies located on Levels 9 through 26, for a total of 17,367 square feet of usable open space as shown in Table 2-2, above, thereby exceeding LAMC requirements by approximately 1,841 square feet. Also refer to Figures 2-28 through 2-35 for Open Space Illustrations. The Project would provide up to approximately 25,202 square feet of amenity space (covered and uncovered) throughout levels 2, 3, 13, 14, and 27, inclusive of the aforementioned common open space. A public paseo would provide pedestrian mid-block access from Hope Street to the existing alleyway and include outdoor seating and landscaping. The paseo would be open to the sky and would connect the proposed outdoor dining areas with the indoor dining, retail, and lobby spaces.

The Project would be required to provide at least 34 trees and 2,863 square feet of landscaping. Currently, there are 10 street trees within the public right-of-way adjacent to the Project Site. These trees would be removed and replaced pursuant to the LAMC as part of the Project. In addition, the Project would comply with LAMC requirements for trees and landscaping.

3.3.4 Access, Circulation, and Parking

Pedestrian access to the Project's various components would be provided by entry points on Pico Boulevard and Hope Street. Vehicular access into the shared three-level subterranean parking garage for the hotel, commercial, and residential uses would be available from the northern portion of the Project Site, with ingress at Hope Street, and ingress and egress at the northern portion of the alleyway.

The Project is located within the ARIA, CCPD, and the DBD. Pursuant to LAMC § 12.21 A.4(i), (p), and (x), parking for the Project shall be provided as shown in Table 2-3, Required Vehicle Parking for the Project.

**Table 2-3
Required Vehicle Parking for the Project**

Land Use	Size	Parking Ratio	Parking Required
Phase I Existing			
Guest Rooms (SRO)	69	No Parking Required per LAMC § 12.21 A.4(x)	None
Basement Restaurant Ground Floor Restaurant			
Phase I Expansion			
Guest Rooms	231 rooms	1 space per 2 guest rooms, first 20 guest rooms 1 space per 4 guest rooms, second 20 guest rooms 1 space per 6 guest rooms, all remaining guest rooms	47 spaces
Retail	1,825 sf	1 space per 1,000 sf	2 spaces
Roof Deck (covered)	1,433 sf	1 space per 1,000 sf	1 space
Meeting Space	5,965 sf	1 space per 1,000 sf	6 spaces
Phase II Hotel and Residential			
Guest Rooms	150 rooms	1 space per 2 guest rooms, first 20 guest rooms 1 space per 4 guest rooms, second 20 guest rooms 1 space per 6 guest rooms, all remaining guest rooms	33 spaces
Dwelling Units	1 Bedroom: 60 units	1 space per dwelling unit less than three habitable rooms	60 spaces
	2 Bedroom: 72 units 3 Bedroom: 3 units	1.25 space per dwelling unit equal to or greater than three habitable rooms	94 spaces
Amenity Space/Club Room	14,497 sf	1 space per 1,000 sf	14 spaces
Restaurant / Retail	7,466 sf	1 space per 1,000 sf	7 spaces
Ballroom / Event Space	6,855 sf	1 space per 100 sf	69 spaces
Meeting Space	1,232 sf	1 space per 1,000 sf	1 space
Total Required Parking			334
sf = square feet			

The Applicant is requesting a 20-percent reduction in required vehicle parking in conjunction with the request for other conditional use approvals, subject to LAMC § 12.24 S. Thus, upon approval of the Conditional Use, the total parking required may be reduced by 67 spaces, or a new total of 267 spaces for all uses.

Pursuant to LAMC § 12.21 A.16(c), buildings undergoing a change of use shall not be required to provide bicycle parking spaces. Therefore, the Existing Hotel portion of the Project is not required to provide bicycle parking spaces. Bicycle parking for the Phase I Expansion and Phase II Hotel and Residential Tower, however, shall be provided pursuant to LAMC § 12.21 A.16, as shown below in Table 2-4, Bicycle Parking Required by the Project.

**Table 2-4
Bicycle Parking Required by the Project**

Use	Size	Parking Ratio	Parking Required ^a
Commercial			
Amenity Space/Club Room	14,497 sf	1 ST per 10,000 SF 1 LT per 10,000 SF	2 ST 2 LT
Restaurant/Retail	10,724 sf	1 ST per 2,000 SF 1 LT per 2,000 SF	5 ST 5 LT
Meeting Space	7,197 sf	1 ST per 10,000 SF 1 LT per 10,000 SF	2 ST 2 LT
Ballroom	6,855 sf	1 ST per 350 SF 1 LT per 700 SF	20 ST 10 LT
Residential			
Guest Rooms	381 guest rooms	1 ST per 10 guest rooms 1 LT per 10 guest rooms	38 ST 38 LT
Dwelling Units (135 units total)	1-25 du	1 ST per 10 dwelling units 1 LT per 1 dwelling unit	2 ST 25 LT
	26-100 du	1 ST per 15 dwelling units 1 LT per 1.5 dwelling units	5 ST 50 LT
	101-135 du	1 ST per 20 dwelling units 1 LT per 2 dwelling units	2 ST 17 LT
Subtotal ST Required			76 ST
Subtotal LT Required			149 LT
Subtotal Bicycle Parking Required (combined)			225 spaces total
<p>a Some values have been rounded as appropriate to reflect LAMC minimums (e.g., minimum of 2 short- and 2 long-term bicycle parking spaces for commercial uses) as well as fractions up to and including 0.5 have been rounded down per LAMC Section 12.21 A.16(b).</p> <p>ST= short term bicycle parking LT = long term bicycle parking</p>			

Further, the Applicant is also requesting to replace vehicle parking spaces with bicycle parking spaces, pursuant to LAMC § 12.21 A.4, up to a maximum of 30 percent for non-residential uses, and 15 percent for residential uses. The Project is required to provide 100 parking spaces for non-residential uses, and 234 parking spaces for residential uses. Thus, 24 parking spaces for non-residential uses, and 28 parking spaces for residential uses (total of 52 parking spaces) may be replaced with bicycle parking.

In conjunction with the maximum permitted bicycle replacement per the LAMC, the resulting number of required vehicle parking spaces would be 215 parking spaces. As shown in Table 2-5, Vehicle Parking Provided by the Project, the Project would provide 215 vehicular parking spaces.

**Table 2-5
Vehicle Parking Provided by the Project**

Land Use	Code-Required Parking	20% Reduction	Revised Parking Subtotal	Bicycle Replacement	Revised Parking Total
Non-Residential	100 spaces	-20 spaces (20%)	80 spaces	-24 spaces (30%)	56
Residential	234 spaces	-47 spaces (20%)	187 spaces	-28 spaces (15%)	159
Total Required	334 spaces	-67 spaces	267 spaces	-52 spaces	215 spaces

Exclusive of the Phase I Existing, the Project consists of a total of 39,273 square feet of commercial space, 381 guest rooms, and 135 dwelling units. As shown above, the Project is required to provide 76 short-term bicycle parking spaces and 149 long-term bicycle parking spaces, for a total of 225 bicycle parking spaces.

As described above in Table 2-4, the Project would replace 52 vehicle parking spaces with bicycle parking spaces at a ratio of four bicycle parking spaces for every vehicle parking space, pursuant to LAMC § 12.21 A.4. At 52 parking spaces, the Project is required to provide a total of 208 bicycle parking spaces to satisfy the replacement of 52 parking spaces. Thus, as the Project would provide 225 Code-required bicycle parking spaces, no additional bicycle parking spaces are required.

3.3.5 Lighting and Signage

New Project signage would be used for building identification, wayfinding, and security markings. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, and would be designed to prevent light trespass onto adjacent properties. Signage for the commercial uses would be in conformance with the LAMC.

3.3.6 Site Security

Given the residential and hotel uses on the Project Site, the Project would operate 24 hours per day. Business hours for commercial operations would likely be within the range of 6:00 AM to 2:00 AM, depending on the requirements of the individual commercial use. The Project would provide security features including, but not limited to, controlled access to residential and hotel areas, and video surveillance.

3.3.7 Sustainability Features

The Project would be compliant with the Los Angeles Green Building code and California Energy/Title 24 requirements, and would include, but not be limited to, the following features:

- Energy efficient elevator;
- Low-flow faucets, shower heads, and toilets;
- Energy efficient mechanical systems;
- Energy efficient glazing and window frames; and
- Energy efficient lighting.

Moreover, in accordance with CEQA Guidelines Appendix F, the Project's Environmental Impact Report will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. An analysis of the Project's consistency with Appendix F will be provided in the EIR.

The Project's open space would include street trees and outdoor amenity terraces, available for both public and private use. The Project will comply with the City's requirements for tree planting to enhance the outdoor environment.

3.3.8 Anticipated Construction Schedule

The Project would be constructed over approximately 36 months. Construction activities would include the demolition of the existing buildings at 1220, 1224, and 1240 Hope Street and removal of the existing surface parking lot, and two phases of grading, excavation, and building construction for the Phase I Expansion and the Phase II Hotel and Residential Tower. Demolition activities are anticipated to start in 2020, and construction completion and building occupancy is anticipated in 2023.

The grading, construction, and finishing of the Project would take place in two, two-year phases. Phase 1 involves the Phase I Existing and Phase I Expansion and would include grading (one month), demolition and preparation (three months), construction (16 months), and finishing (four months). Phase 2 involves the Phase II Hotel and Residential Tower and would include grading (four months), construction (16 months), and finishing (four months). The two phases would overlap for one year.

The Project is estimated to require a net export of approximately 45,900 cubic yards of soil. Exported materials would likely be disposed at Sunshine Canyon Landfill in Sylmar. The Project's haul route would be considered by the City as part of its review of the Project's entitlement requests.

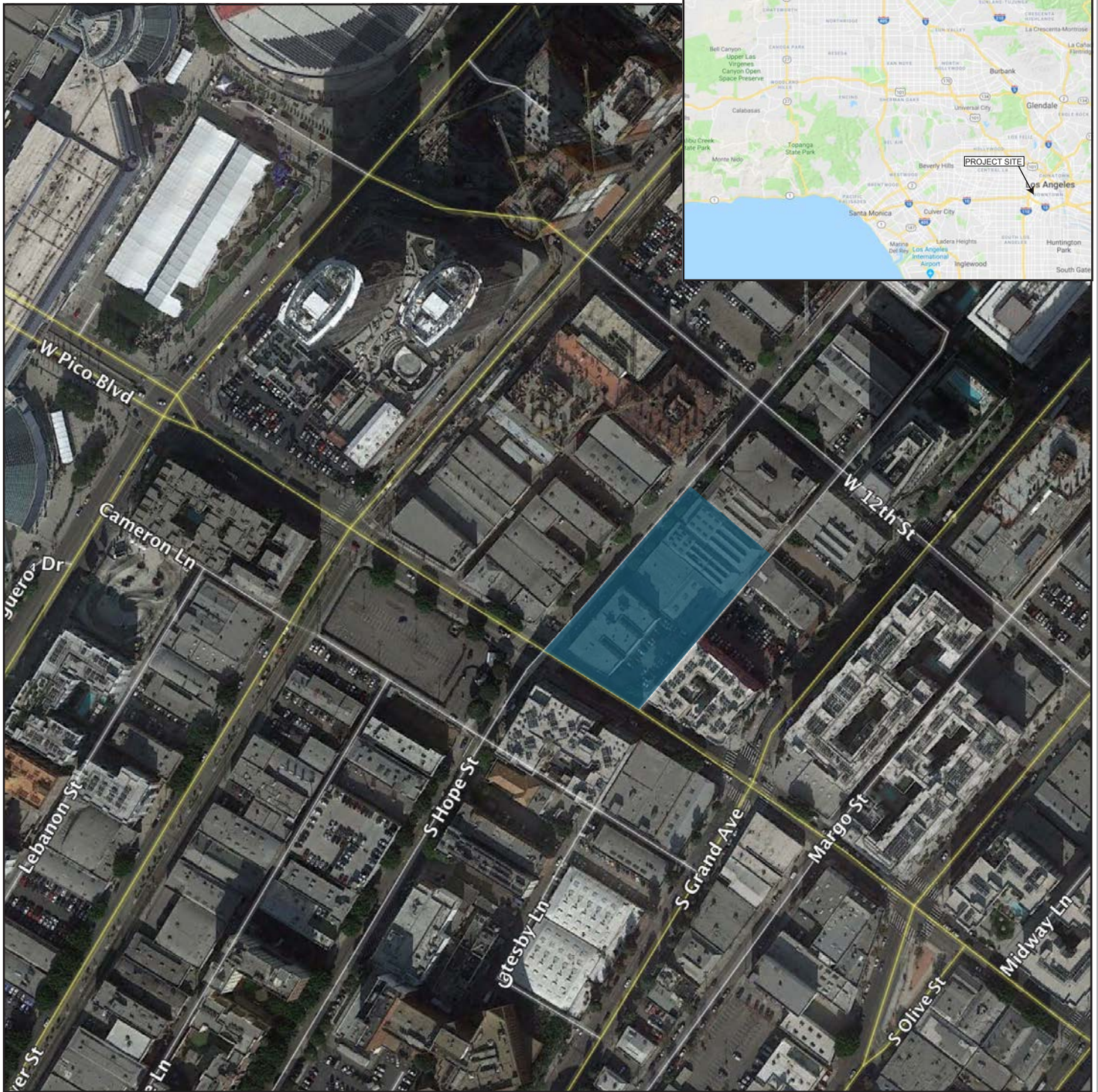
3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

- (1) Pursuant to LAMC Section 17.15, a Vesting Tentative Tract (VTT) for the merger of lots and the subdivision of airspace for condominium purposes; a waiver of the dedication requirement for Pico Boulevard and Hope Street to permit the continued maintenance of the 12-foot wide sidewalk and existing street wall on said streets in lieu of the required dedications to the public right-of-way; and a haul route approval;
- (2) Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit (MCUP) to permit the sale of alcoholic beverages for on-site consumption within: (1) the basement

bar and lounge; (2) the two ground-floor restaurants; and (3) throughout the hotel, including in-room mini-bars and on rooftop amenity decks;

- (3) Pursuant to LAMC Section 12.24 W.18, a Conditional Use Permit for Live Entertainment (CUX) to permit dancing and live-entertainment in the bar/lounge, restaurant and hotel uses;
- (4) Pursuant to LAMC Section 12.24 S, a request for a 20-percent reduction in required vehicle parking in conjunction with the request for other Conditional Use approvals;
- (5) Pursuant to LAMC Section 16.05 E, Site Plan Review (SPR) to permit the development consisting of more than 50 residential units and guest rooms;
- (6) Any other permits or approvals by other City agencies regarding findings of consistency with the City Center Redevelopment Plan; and
- (7) Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits in order to execute and implement the Project.



■ Project Site
Source: GoogleEarth, August 2018.



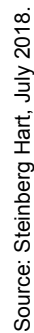
Figure 2-1
Regional Vicinity and Project Location Map



- Project Site
- Transit Priority Area
- Metro Pico Station

Source: Google Maps, December 2018.

Figure 2-2
Project Site and Transit Priority Area





Source: Steinberg Hart, July 2018.

Figure 2-4
Floor Plan – Level B3



Source: Steinberg Hart, July 2018.

Figure 2-5
Floor Plan – Level B2

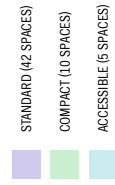
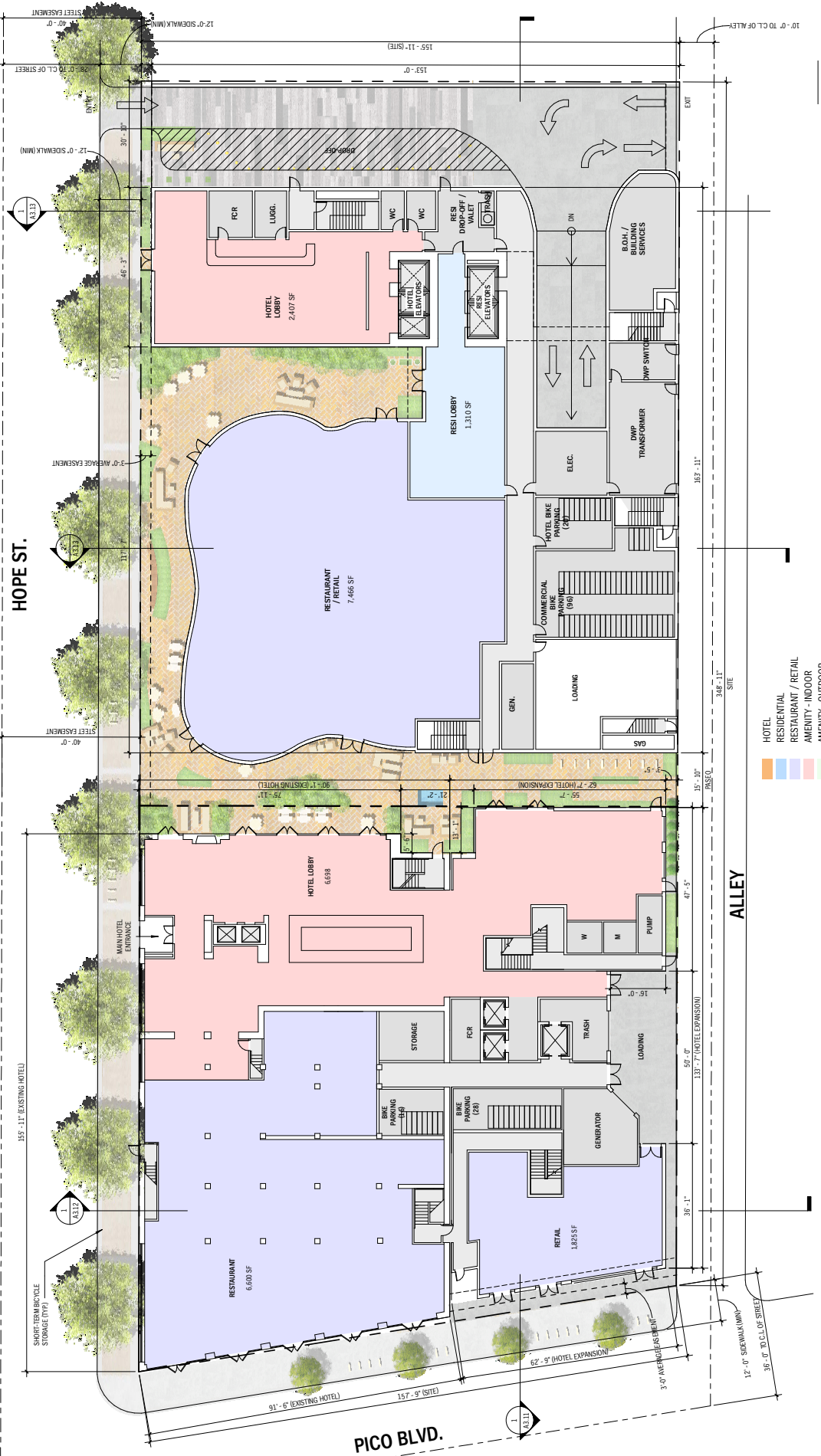


Figure 2-6
Floor Plan – Level B1

Figure 2-7
Floor Plan – Level 1



Source: Steinberg Hart, December 2018.



Figure 2-8
Floor Plan – Level 2

Source: Steinberg Hart, December 2018.

Figure 2-9
Floor Plan – Level 3

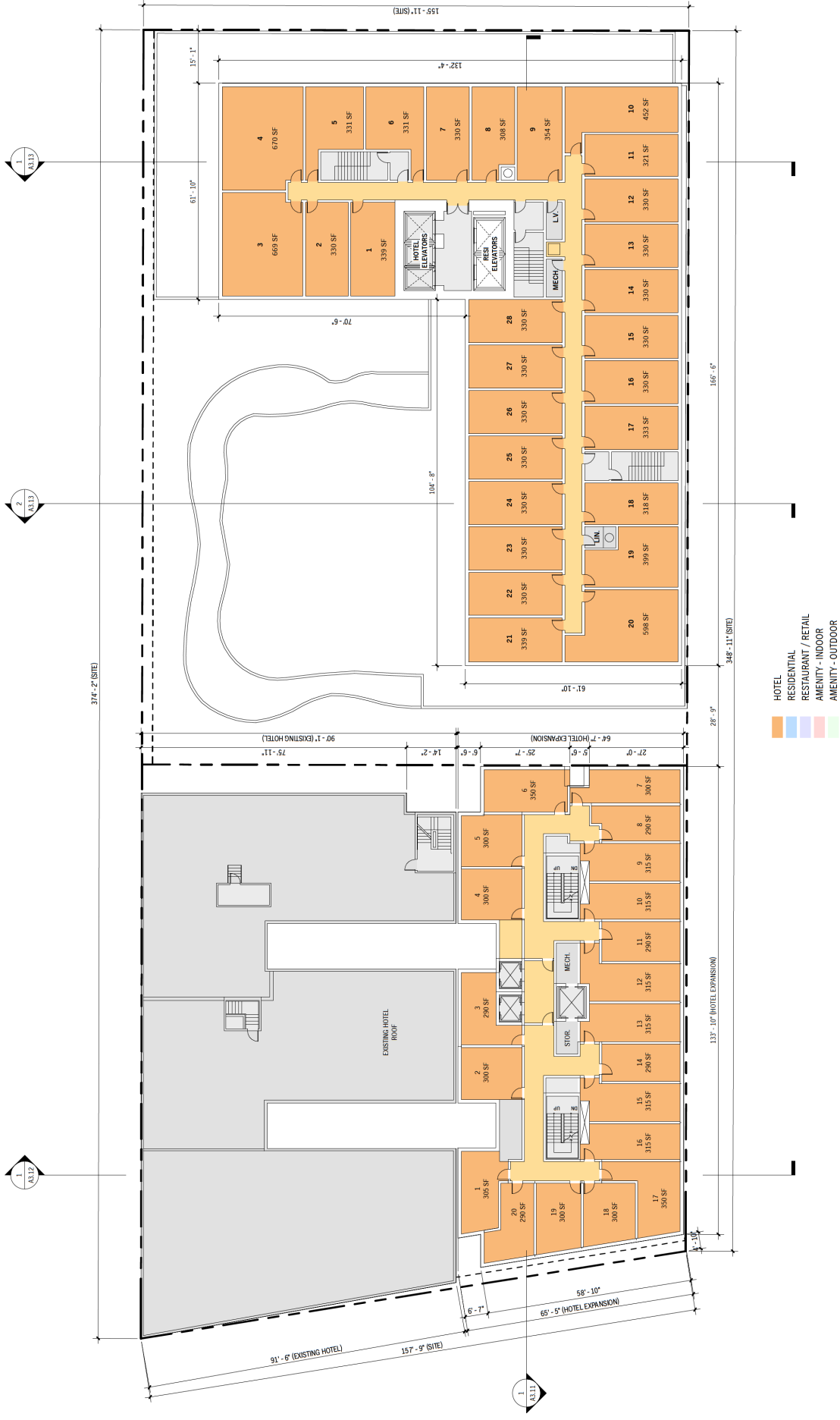


Source: Steinberg Hart, December 2018.

Figure 2-10
Floor Plan – Level 4



Source: Steinberg Hart, December 2018.



Source: Steinberg Hart, December 2018.

Figure 2-11
Floor Plan – Levels 5 & 6



Source: Steinberg Hart, December 2018.

Figure 2-12
Floor Plan – Level 7



Figure 2-14
Floor Plan – Level 9



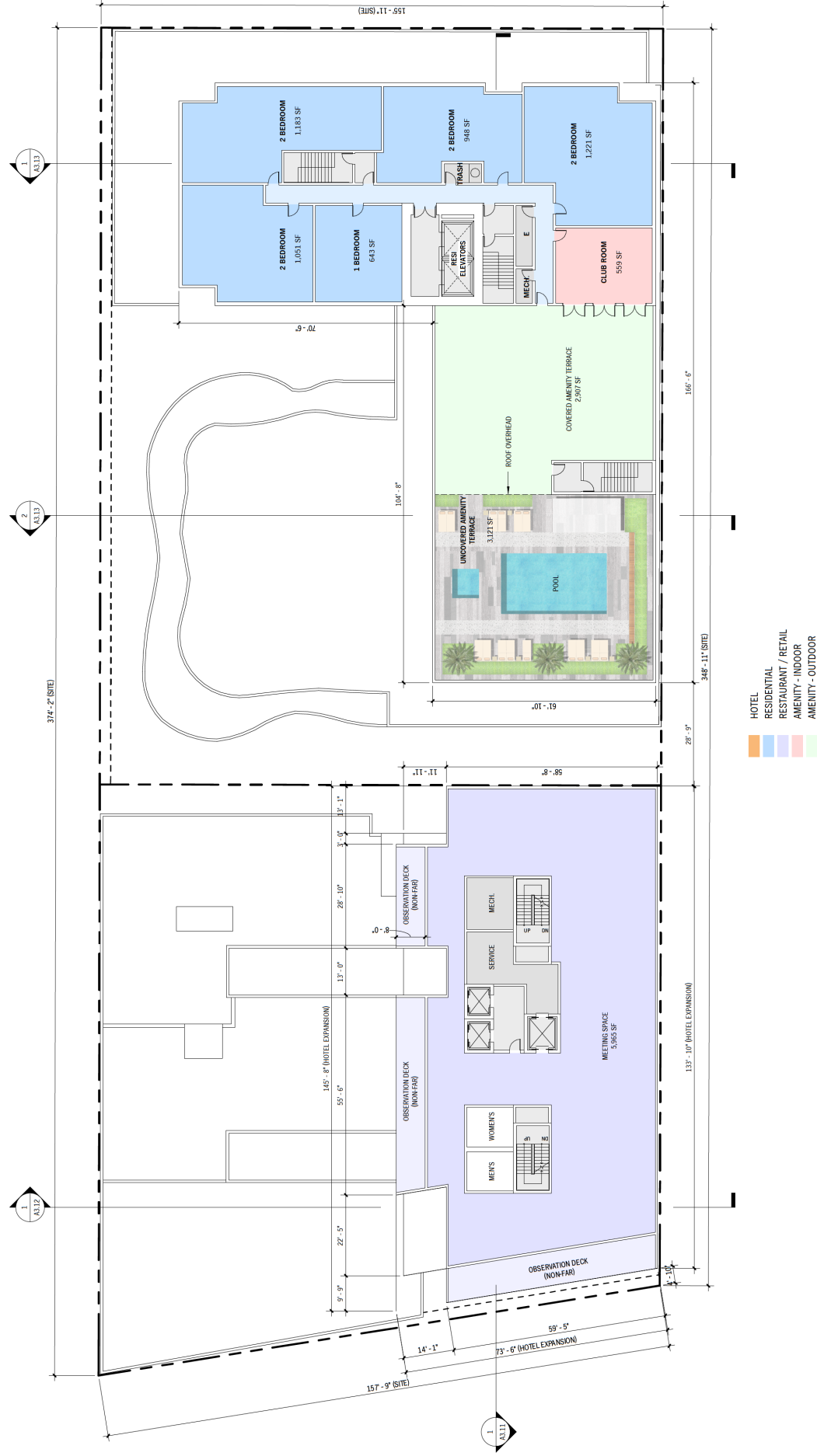
Source: Steinberg Hart, December 2018.

Figure 2-15
Floor Plan – Levels 10 & 11



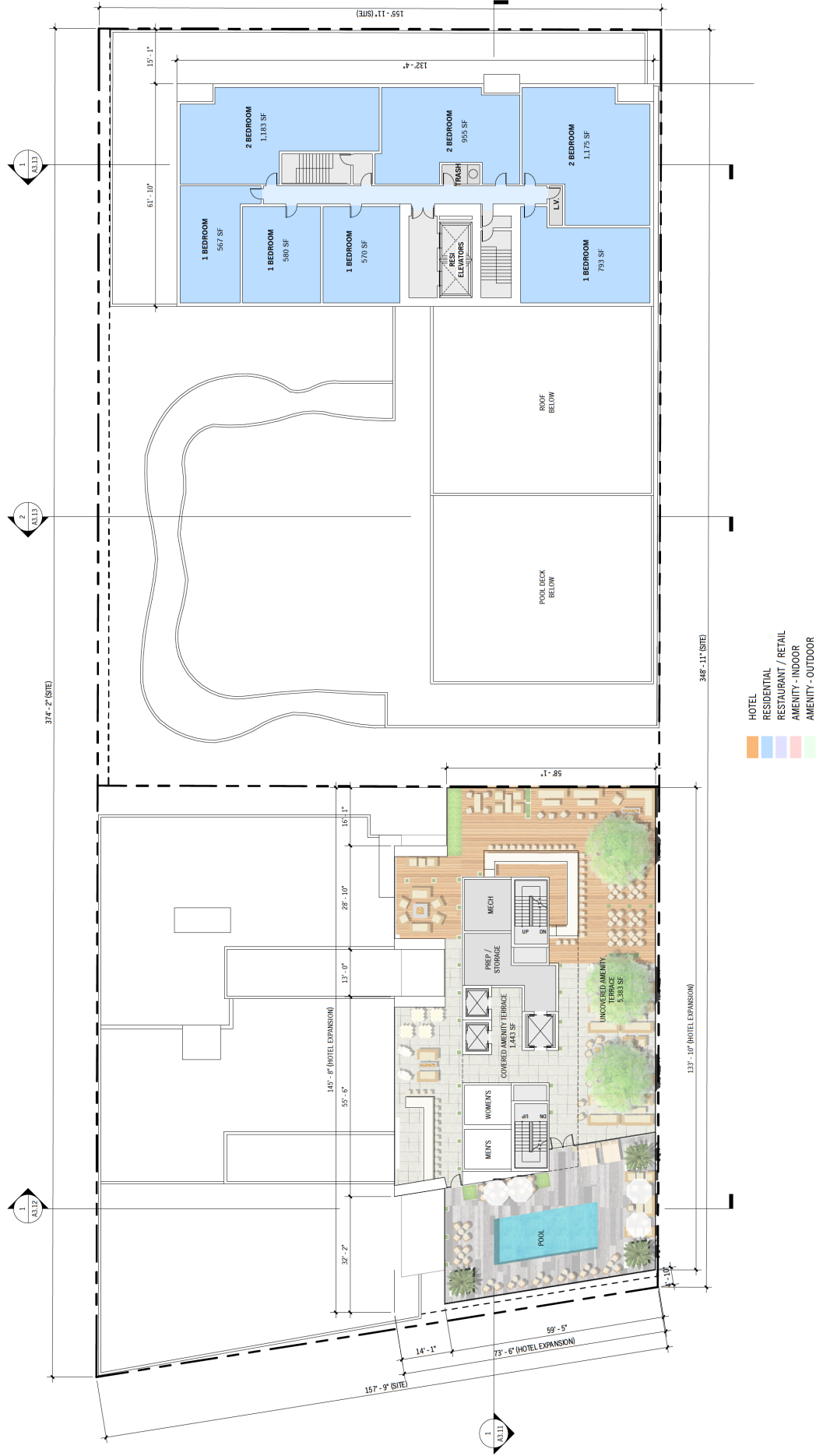
Source: Steinberg Hart, December 2018.

Figure 2-16
Floor Plan – Level 12



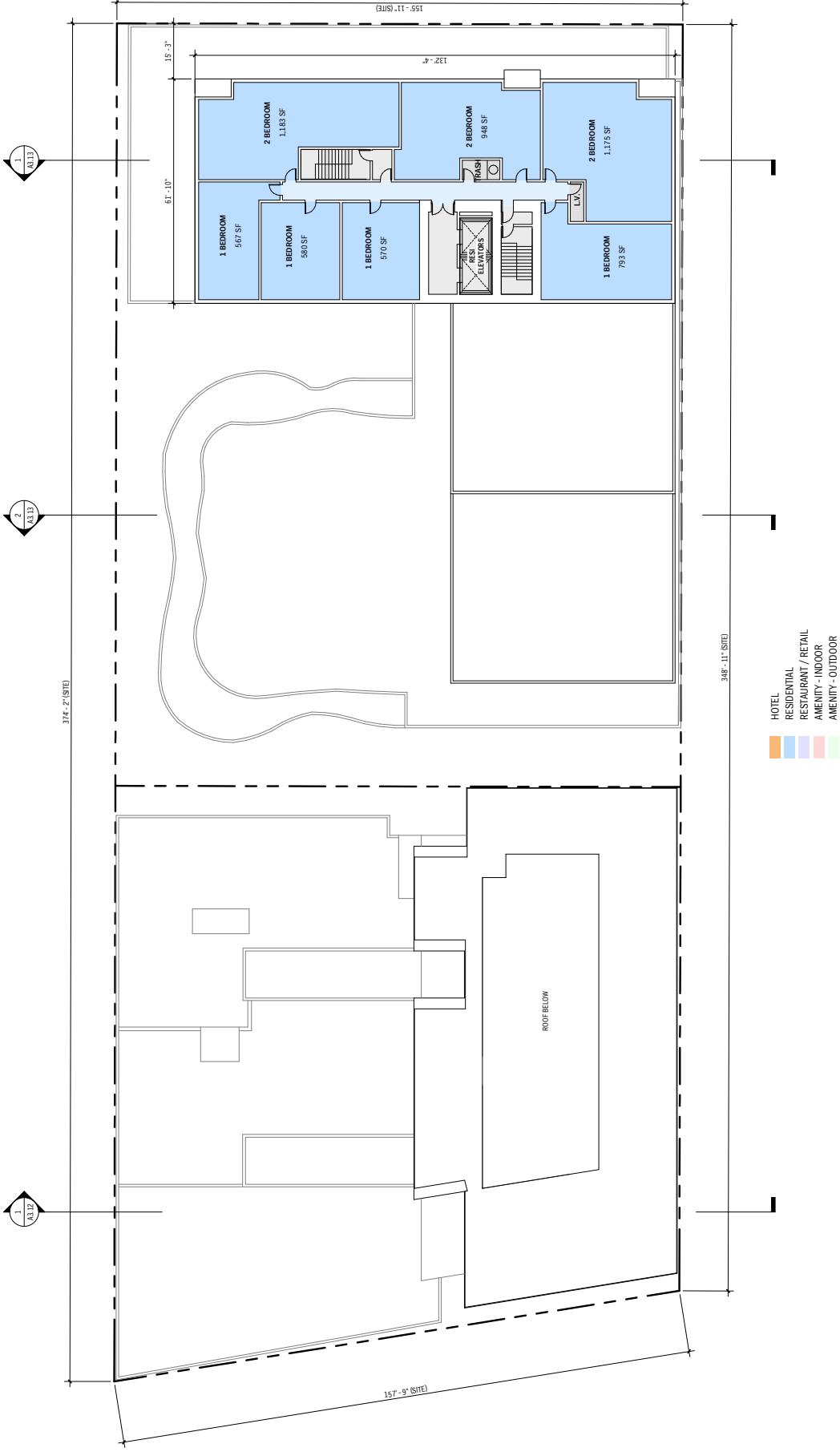
Source: Steinberg Hart, December 2018.

Figure 2-17
Floor Plan – Level 13



Source: Steinberg Hart, December 2018.

Figure 2-18
Floor Plan – Levels 14

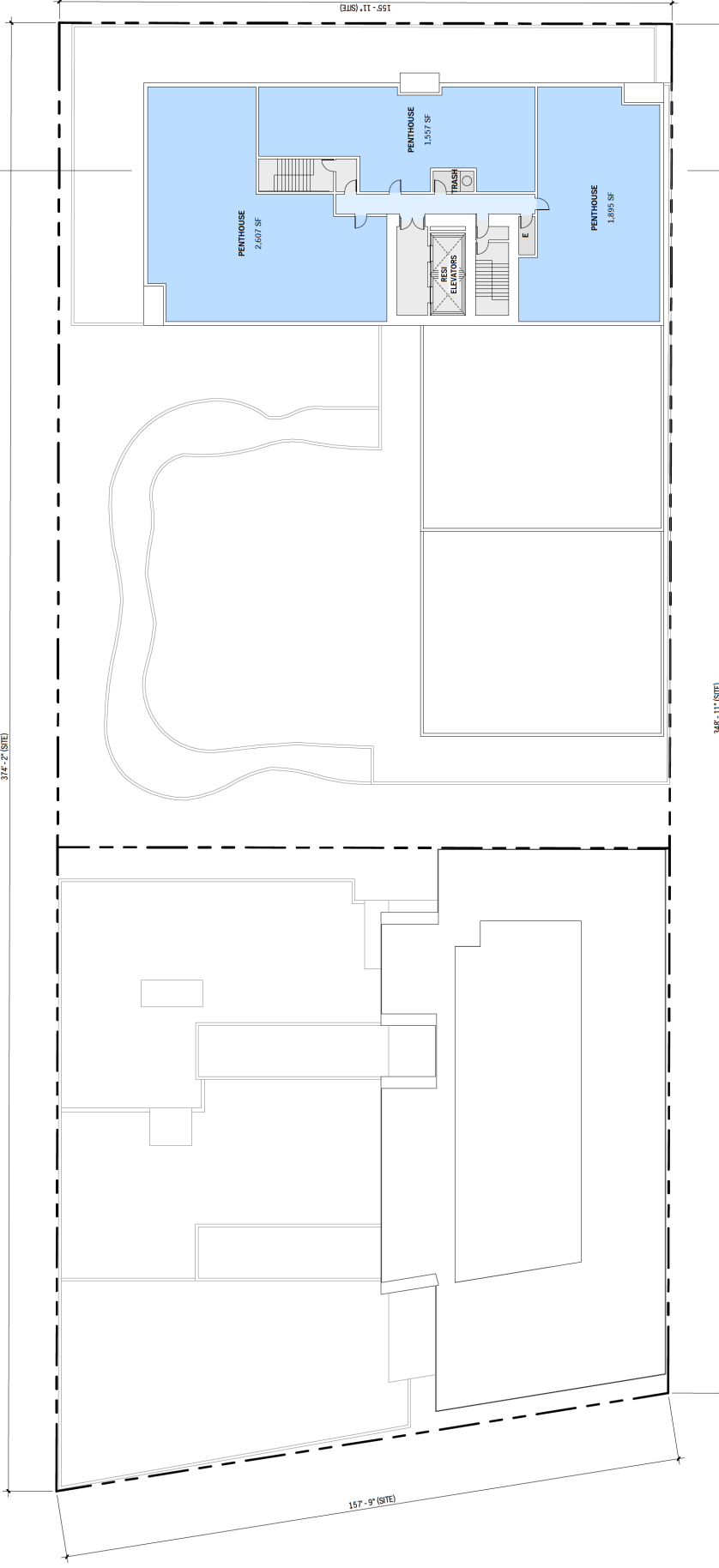


Source: Steinberg Hart, December 2018.

Figure 2-19
Floor Plan – Levels 15-25



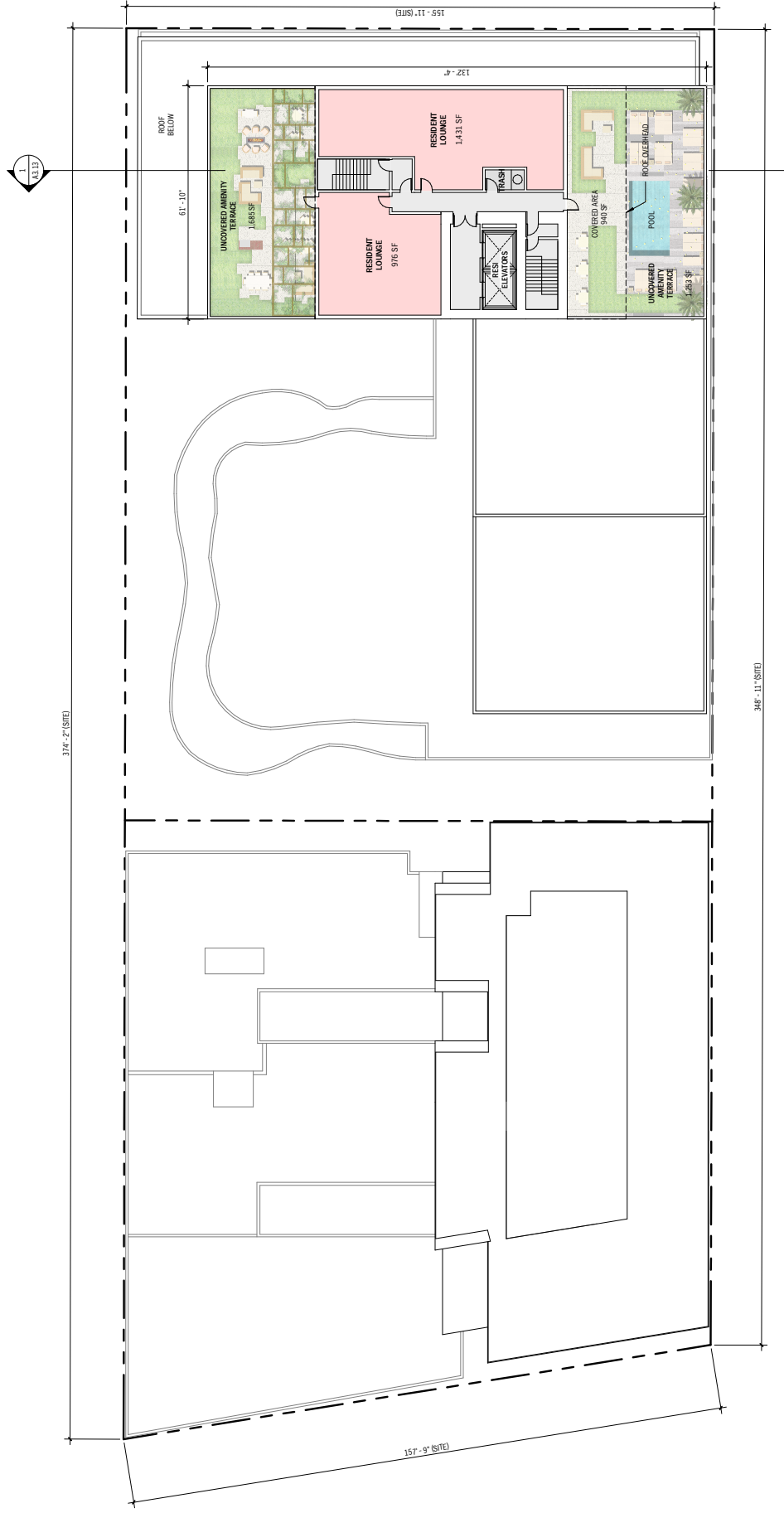
374'-2" (SITE)



- HOTEL
- RESIDENTIAL
- RESTAURANT / RETAIL
- AMENITY - INDOOR
- AMENITY - OUTDOOR

Source: Steinberg Hart, December 2018.

Figure 2-20
Floor Plan – Level 26



Source: Steinberg Hart, December 2018.

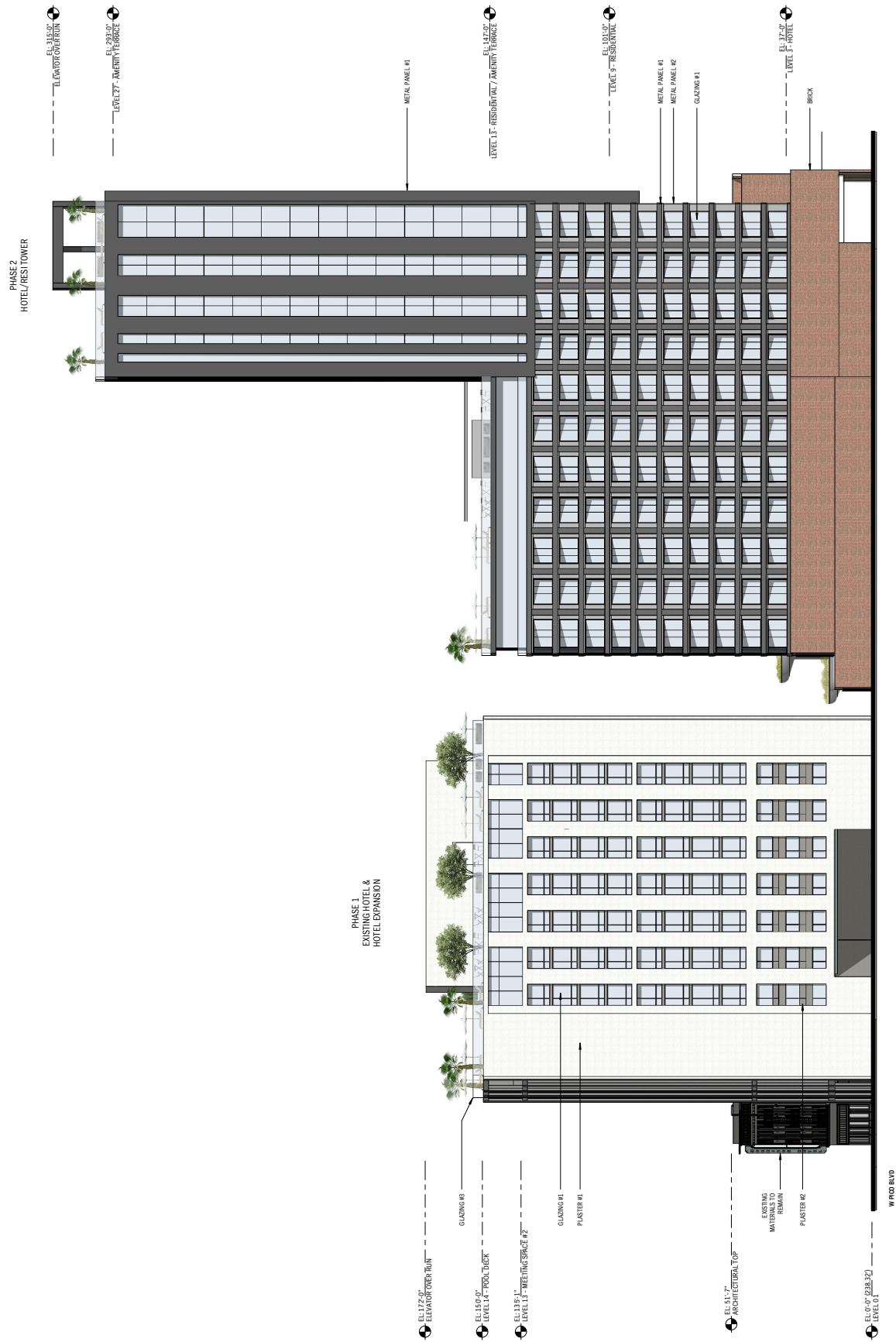
Figure 2-21
Floor Plan – Level 27



Source: Steinberg Hart, December 2018.

Figure 2-22
West Elevation

Figure 2-23
East Elevation



Source: Steinberg Hart, December 2018.

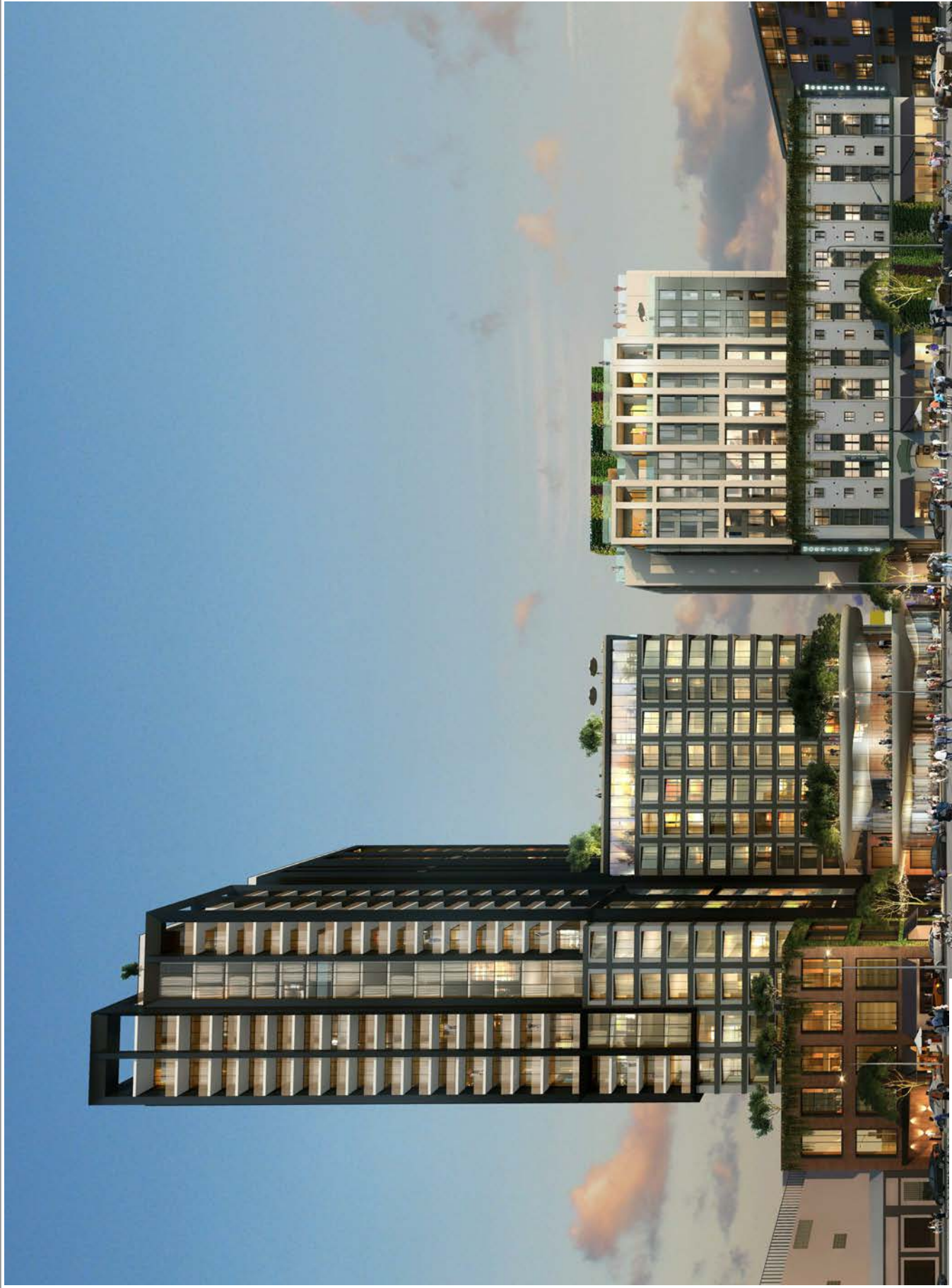
[illegible]Figure 2-24
North Elevation

PHASE 2
HOTEL/RES TOWER



Source: Steinberg Hart, December 2018.

Figure 2-25
South Elevation



Source: Steinberg Hart, July 2018.

Figure 2-26
Project Rendering



Source: Steinberg Hart, July 2018.

Figure 2-27
Project Rendering

TREE LEGEND



NAME	WUCOLS	QUANTITY
Existing Tree	-	9
<i>Olea europaea</i> 'Fruitless'	L	16
Fruitless Olive Tree		
<i>Podocarpus macrophyllus</i>	M	4
Yew Podocarpus		
<i>Podocarpus henkelii</i>	M	7
Long Leaf Yellow Wood		
<i>Washingtonia filifera</i>	L	9
California Fan Palm		

KEYNOTE LEGEND

- PROPERTY LINE
- PLANTING AREA, TYP.
- PLANTER WALL
- PLANTING POT, TYP.
- EXISTING TREE, TYP.
- PROPOSED TREE, TYP.
- FOCAL POINT WATER FEATURE
- HANGING LIGHTS
- VINE COVERED TRELLIS
- LA DESIGN GUIDELINE

- SHORT-TERM BIKE RACKS, TYP.
- OUTDOOR FURNITURE, TYP.
- DECORATIVE BRICK PAVING
- INTEGRAL COLOR CONC. PAVER, TYP.
- WOOD DECK PAVER
- BOLLARD, TYP.
- IPE WOOD BENCH, TYP.
- SWIMMING POOL/SPA
- UMBRELLA, TYP.
- FIRE PIT, TYP.
- BBQ



Source: Steinberg Hart, July 2018.

Figure 2-28
Landscape Plan – Level 1

TREE LEGEND

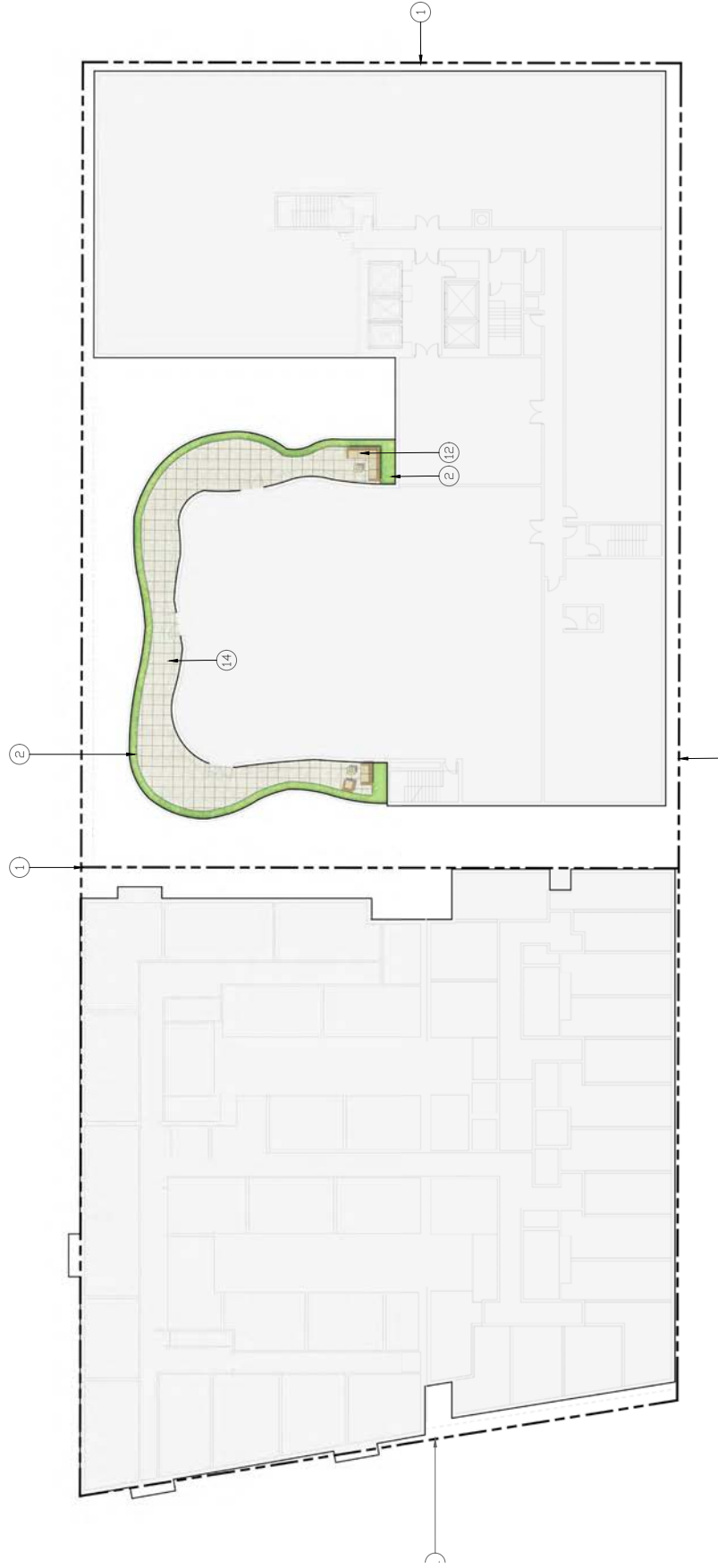


Existing Tree	-	9
<i>Olea europaea</i> 'Fruitless'	L	16
Fruitless Olive Tree		
<i>Podocarpus macrophyllus</i>	M	4
Yew Podocarpus		
<i>Podocarpus henkelii</i>	M	7
Long Leaf Yellow Wood		
<i>Washingtonia filifera</i>	L	9
California Fan Palm		

KEYNOTE LEGEND

1. PROPERTY LINE
2. PLANTING AREA, TYP.
3. PLANTER WALL
4. PLANTING POT, TYP.
5. EXISTING TREE, TYP.
6. PROPOSED TREE, TYP.
7. FOCAL POINT WATER FEATURE
8. HANGING LIGHTS
9. VINE COVERED TRELLIS
10. SIDEWALK DESIGN PER DOWNTOWN LA DESIGN GUIDELINE

11. SHORT-TERM BIKE RACKS, TYP.
12. OUTDOOR FURNITURE, TYP.
13. DECORATIVE BRICK PAVING
14. INTEGRAL COLOR CONC. PAVER, TYP.
15. WOOD DECK PAVER
16. BOLLARD, TYP.
17. IPE WOOD BENCH, TYP.
18. SWIMMING POOL/SPA
19. UMBRELLA, TYP.
20. FIRE PIT, TYP.
21. BBQ



Source: Steinberg Hart, July 2018.

Figure 2-29
Landscape Plan – Level 2

TREE LEGEND

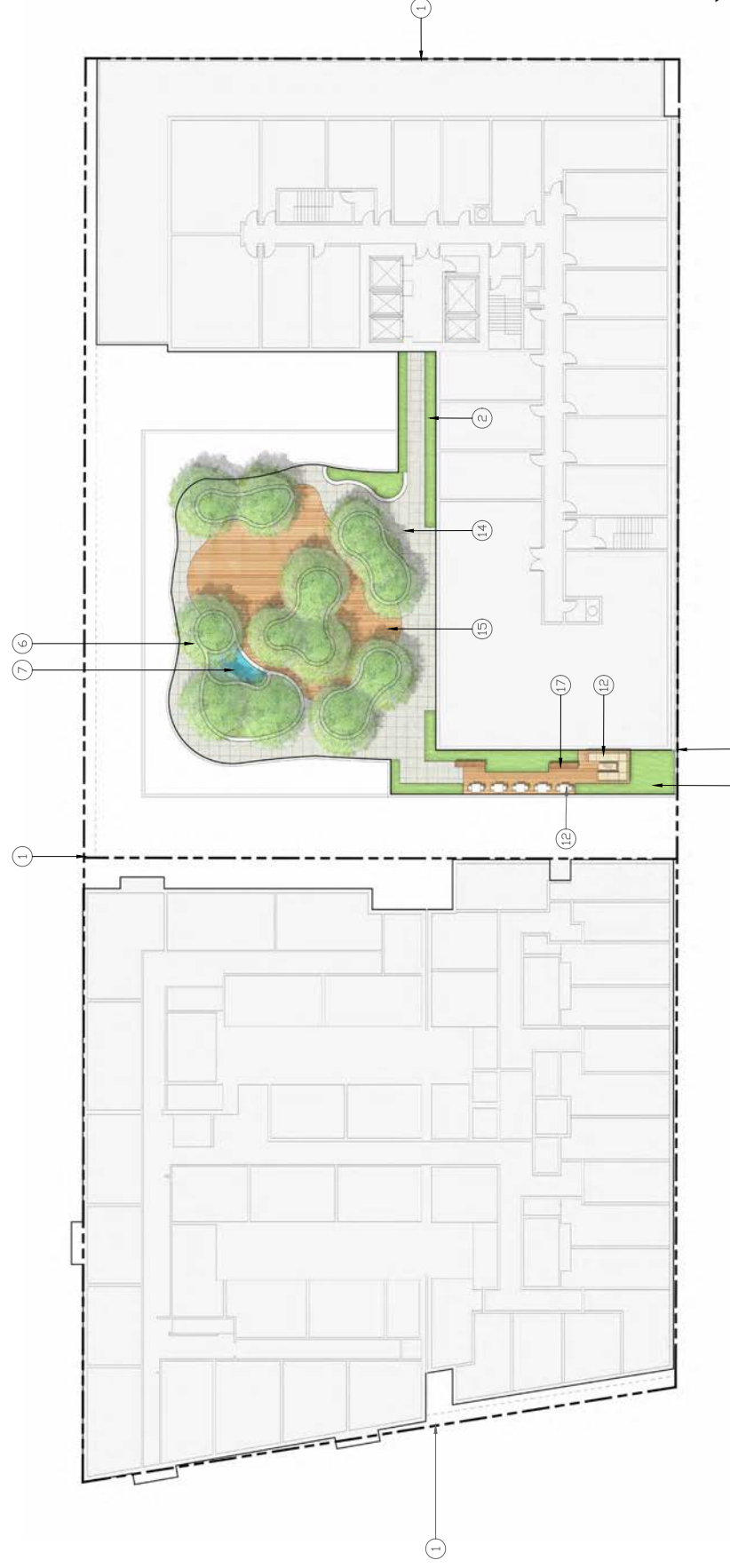


Existing Tree	-	9
<i>Olea europaea</i> 'Fruitless'	L	16
Fruitless Olive Tree		
<i>Podocarpus macrophyllus</i>	M	4
Yew Podocarpus		
<i>Podocarpus henkelii</i>	M	7
Long Leaf Yellow Wood		
<i>Washingtonia filifera</i>	L	9
California Fan Palm		

KEYNOTE LEGEND

1. PROPERTY LINE
2. PLANTING AREA, TYP.
3. PLANTER WALL
4. PLANTING POT, TYP.
5. EXISTING TREE, TYP.
6. PROPOSED TREE, TYP.
7. FOCAL POINT WATER FEATURE
8. HANGING LIGHTS
9. VINE COVERED TRELLIS
10. SIDEWALK DESIGN PER DOWNTOWN LA DESIGN GUIDELINE










11. SHORT-TERM BIKE RACKS, TYP.
12. OUTDOOR FURNITURE, TYP.
13. DECORATIVE BRICK PAVING
14. INTEGRAL COLOR CONC. PAVER, TYP.
15. WOOD DECK, PAVER
16. BOLLARD, TYP.
17. IPE WOOD BENCH, TYP.
18. SWIMMING POOL/SPA
19. UMBRELLA, TYP.
20. FIRE PIT, TYP.
21. BBQ



Source: Steinberg Hart, July 2018.

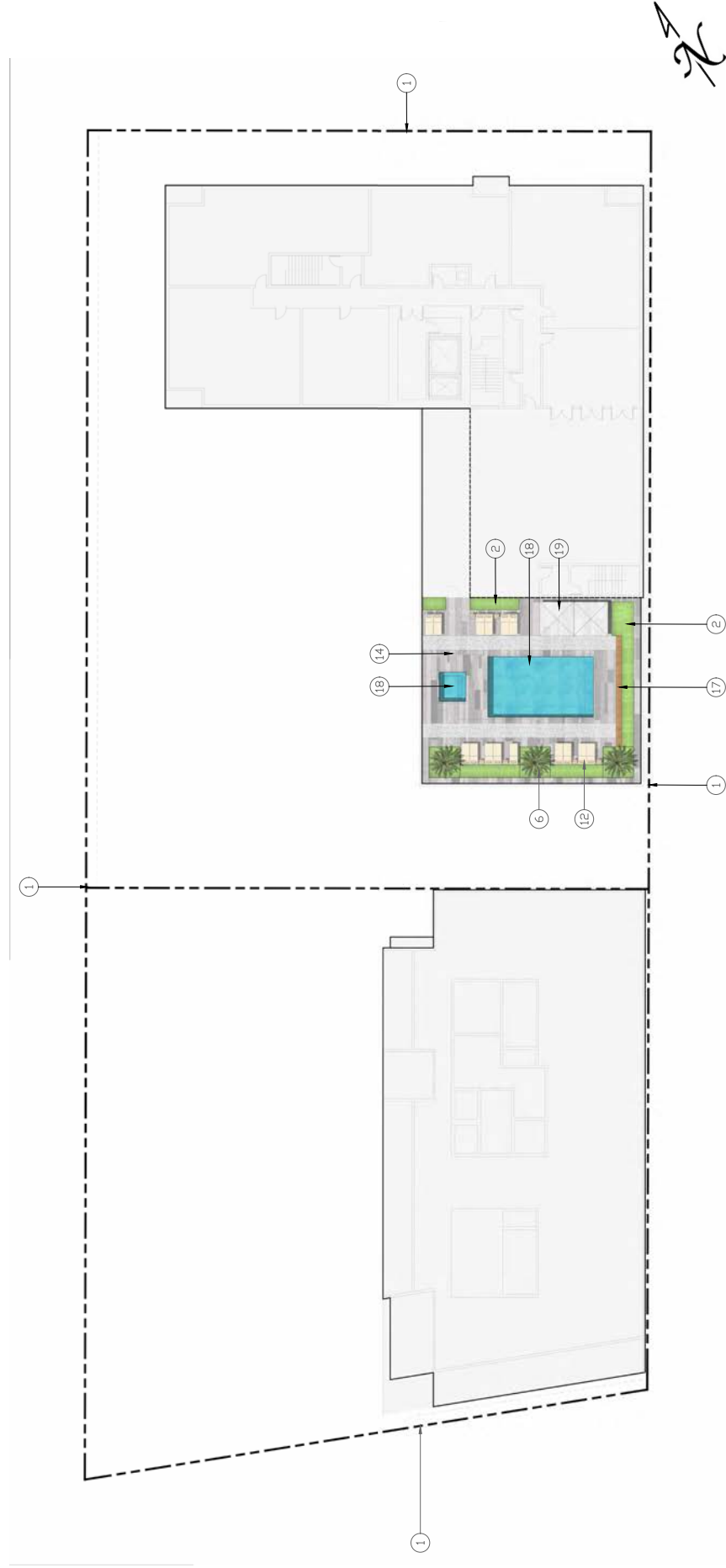
Figure 2-30
Landscape Plan – Level 3

TREE LEGEND

	Existing Tree	-	9
	<i>Olea europaea</i> 'Fruitless'	L	16
	Fruitless Olive Tree	M	4
	<i>Podocarpus macrophyllus</i>	M	7
	Yew Podocarpus	L	9
	<i>Podocarpus henkelii</i>		
	Long Leaf Yellow Wood		
	<i>Washingtonia filifera</i>		
	California Fan Palm		

- KEYNOTE LEGEND**
1. PROPERTY LINE
 2. PLANTING AREA, TYP.
 3. PLANTER WALL
 4. PLANTING POT, TYP.
 5. EXISTING TREE, TYP.
 6. PROPOSED TREE, TYP.
 7. FOCAL POINT WATER FEATURE
 8. HANGING LIGHTS
 9. VINE COVERED TRELLIS
 10. SIDEWALK DESIGN PER DOWNTOWN LA DESIGN GUIDELINE

11. SHORT-TERM BIKE RACKS, TYP.
12. OUTDOOR FURNITURE, TYP.
13. DECORATIVE BRICK PAVING
14. INTEGRAL COLOR CONC. PAVER, TYP.
15. WOOD DECK PAVER
16. BOLLARD, TYP.
17. IPE WOOD BENCH, TYP.
18. SWIMMING POOL/SPA
19. UMBRELLA, TYP.
20. FIRE PIT, TYP.
21. BBQ



Source: Steinberg Hart, July 2018.

Figure 2-31
Landscape Plan – Level 13

TREE LEGEND

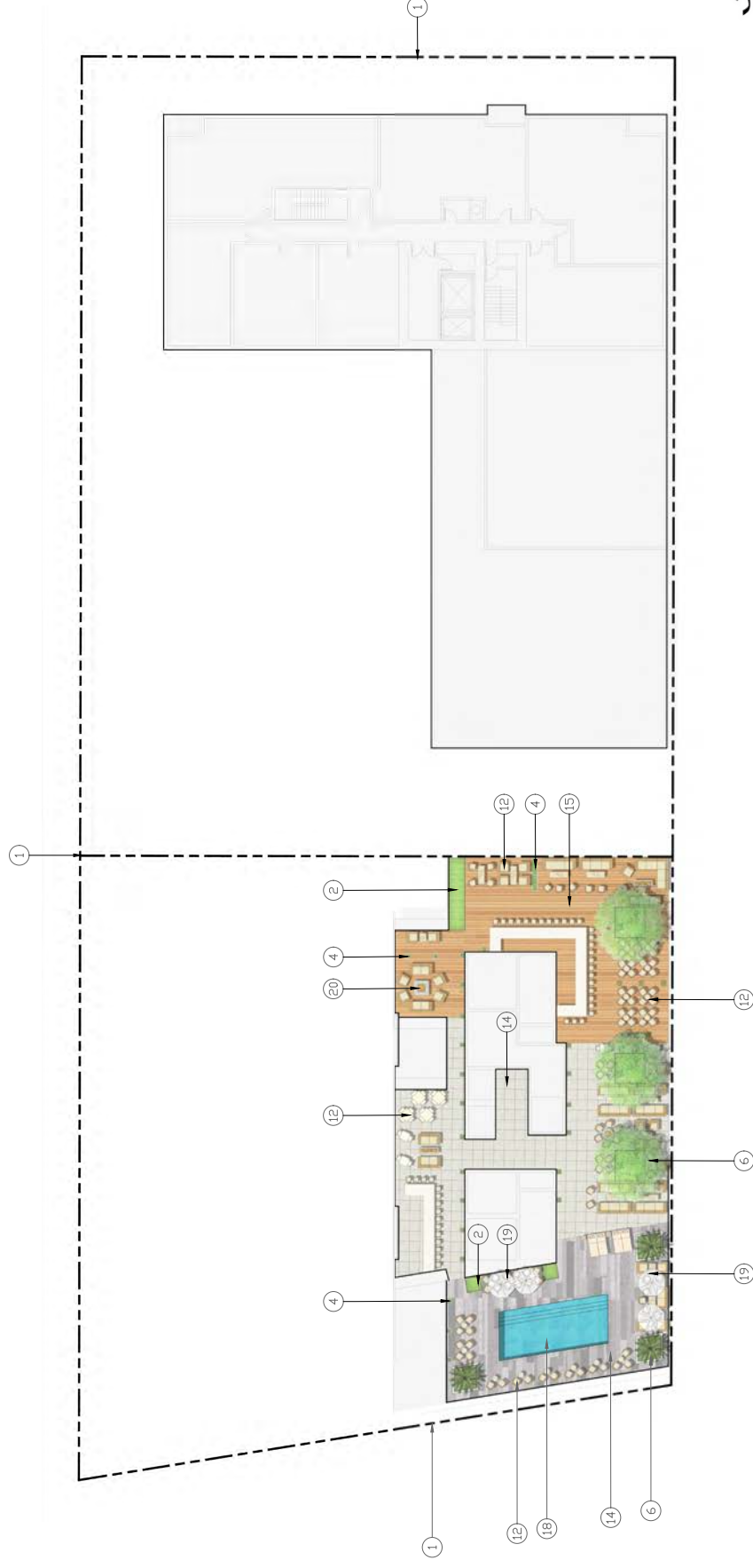


<i>Existing Tree</i>	-	9
<i>Olea europaea 'Fruitless'</i>	L	16
<i>Fruitless Olive Tree</i>		
<i>Podocarpus macrophyllus</i>	M	4
<i>Yew Podocarpus</i>		
<i>Podocarpus henkelii</i>	M	7
<i>Long Leaf Yellow Wood</i>		
<i>Washingtonia filifera</i>	L	9
<i>California Fan Palm</i>		

KEYNOTE LEGEND

1. PROPERTY LINE
2. PLANTING AREA, TYP.
3. PLANTER WALL
4. PLANTING POT, TYP.
5. EXISTING TREE, TYP.
6. PROPOSED TREE, TYP.
7. FOCAL POINT WATER FEATURE
8. HANGING LIGHTS
9. VINE COVERED TRELLIS
10. SIDEWALK DESIGN PER DOWNTOWN LA DESIGN GUIDELINE










11. SHORT-TERM BIKE RACKS, TYP.
12. OUTDOOR FURNITURE, TYP.
13. DECORATIVE BRICK PAVING
14. INTEGRAL COLOR CONC. PAVER, TYP
15. WOOD DECK PAVER
16. BOLLARD, TYP.
17. IPE WOOD BENCH, TYP.
18. SWIMMING POOL/SPA
19. UMBRELLA, TYP.
20. FIRE PIT, TYP.
21. BBQ



Source: Steinberg Hart, July 2018.

Figure 2-32
Landscape Plan – Level 14

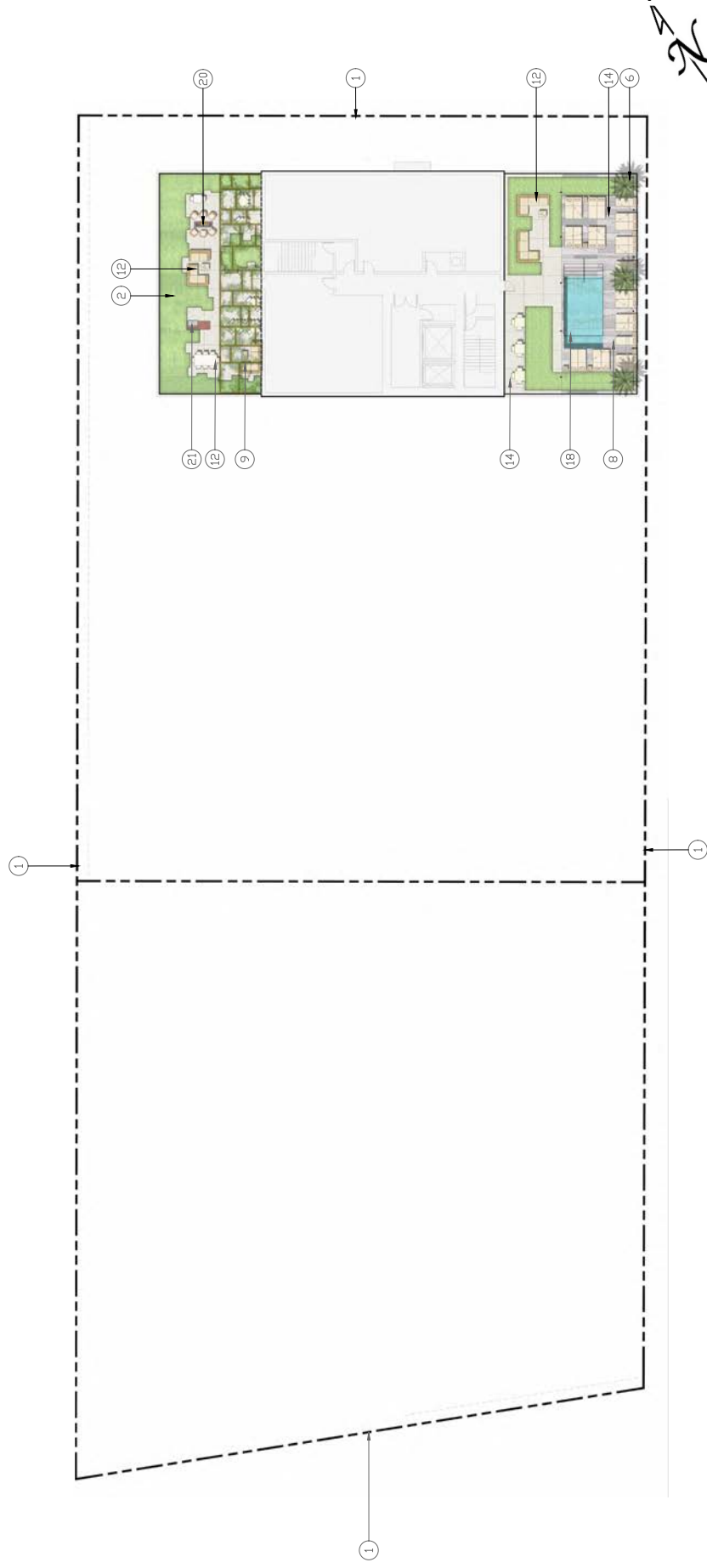
TREE LEGEND

	Existing Tree	-	9
	<i>Olea europaea</i> 'Fruitless'	L	16
	Fruitless Olive Tree	M	4
	<i>Podocarpus macrophyllus</i>	M	7
	Yew Podocarpus	L	9
	<i>Podocarpus henkelii</i>		
	Long Leaf Yellow Wood		
	<i>Washingtonia filifera</i>		
	California Fan Palm		

KEYNOTE LEGEND

1. PROPERTY LINE
2. PLANTING AREA, TYP.
3. PLANTER WALL
4. PLANTING POT, TYP.
5. EXISTING TREE, TYP.
6. PROPOSED TREE, TYP.
7. FOCAL POINT WATER FEATURE
8. HANGING LIGHTS
9. VINE COVERED TRELLIS
10. SIDEWALK DESIGN PER DOWNTOWN LA DESIGN GUIDELINE

11. SHORT-TERM BIKE RACKS, TYP.
12. OUTDOOR FURNITURE, TYP.
13. DECORATIVE BRICK PAVING
14. INTEGRAL COLOR CONC. PAVER, TYP.
15. WOOD DECK PAVER
16. BOLLARD, TYP.
17. IPE WOOD BENCH, TYP.
18. SWIMMING POOL/SPA
19. UMBRELLA, TYP.
20. FIRE PIT, TYP.
21. BBQ



Source: Steinberg Hart, July 2018.

Figure 2-33
Landscape Plan – Level 27



Iris alba
African Iris



Lupinus albus
Silver Streak Flax



Pennisetum setaceum
Mexican Feathergrass



Tulipia violacea
Tri-Color Society Garlic



Philodendron
Philodendron



Anigozanthos flavidus
Kangaroo Paw Bush



Muhlenbergia capillaris
Pink Muhly Grass



Rosmarinus officinalis
Tuscan Blue Rosemary



Grevillea neilii
Noel Greville



Juncus patens
California Gray Rush



Pennisetum setaceum
Mexican Feathergrass



Myrtus communis compacta
Dwarf Myrtle



Rosmarinus officinalis
Tuscan Blue Rosemary



Lavandula angustifolia
Hidcote Blue English Lavender



Rosmarinus officinalis
Upright Rosemary



Rosmarinus officinalis
Upright Rosemary



Carex divisa
Berkeley Sedge



Raphiolepis indica
Ballerina Indian Hawthorn



Euonymus japonicus
Variegated Boxleaf Euonymus



Agave attenuata
Fox Tail Agave



Koebechia pyramidalis
Desert Rose



Festuca glauca
Blue Fescue



Callistemon citrinus
Dwarf Boleenush



Callistemon citrinus
Dwarf Boleenush



Phoenix dactylifera
Date palm



Olea europaea
Fruitless Olive Tree



Podocarpus macrophyllus
Yew Podocarpus



Podocarpus henkelii
Long Leafed Yellowwood



Aeonium
Giant Red Aeonium



Carex morrowii
Variegated Japanese Sedge



Senecio
Senecio



Carrisa macrocarpa
Dwarf Natal Plum

Source: Steinberg Hart, July 2018.

Figure 2-34
Landscape Plan – Planting Palette



Source: Steinberg Hart, July 2018.

Figure 2-35
Landscape Plan – Inspiration Images



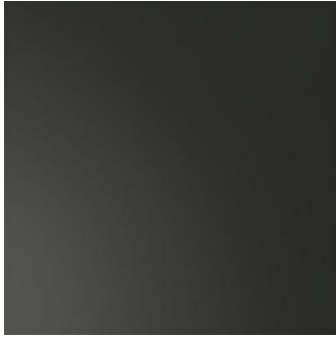
GLAZING #1: VISION GLASS, HIGH PERFORMANCE IGU, LOW REFLECTIVE



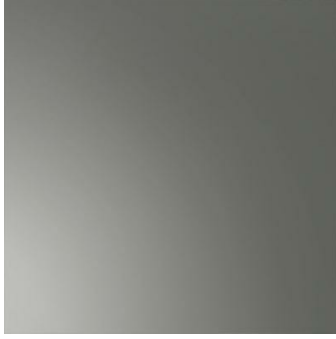
GLAZING #2: VISION GLASS, CURVED IGU, LOW REFLECTIVE



GLAZING #3: TEMPERED GLASS GUARDRAIL, LOW REFLECTIVE



METAL PANEL #1
DARK GRAY



METAL PANEL #2
SILVER GRAY



BRICK



PLASTER #1
ECRU, SAND FLOAT FINISH



PLASTER #2
DARK TAUPE, SAND FLOAT FINISH



PLASTER #3
WHITE, SMOOTH FINISH

Source: Steinberg Hart, July 2018.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. The responses below provide an initial analysis of potential environmental impacts, indicate those issues that are expected to be further analyzed in an Environmental Impact Report (EIR), and demonstrate why other issues, which will not result in potentially significant environmental impacts, do not need to be analyzed further in an EIR. The questions with responses that indicate a “Potentially Significant Impact” do not presume that a significant environmental impact would, in fact, result from the Project. Rather, such responses indicate those issues will be further analyzed in an EIR to determine the impact level of significance in compliance with CEQA.

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: “Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 defines an “employment center project” as “a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 *L.A. CEQA Thresholds Guide*, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that “visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City’s CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA.”⁷

⁷ City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>. Accessed April 4, 2019.

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this initial study is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

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

a. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The approximately 1.29-acre Project Site is relatively flat and currently developed with an existing hotel, its associated surface parking lot, and three, two-story commercial industrial buildings. The existing buildings are built out to the lot line at the street frontages and vehicle access to the Project Site is provided via Pico Boulevard and the adjacent alley. Nearly the entire site is paved except for existing street tree planters. There are no prominent topographical features on the Project Site from which scenic vistas could be viewed, nor does the Project Site contain a scenic vista. The existing viewshed at the Project Site is defined by existing urban downtown development with commercial and mixed-use residential structures nearby of varying mass, height, and design.

The Project would include the rehabilitation and adaptive reuse of the existing four-story hotel, with a maximum building height of 52 feet above grade, the development of a 14-story hotel expansion with a maximum building height of 172 feet above grade, and a new 27-story hotel/residential tower with a maximum building height of 315 feet above grade. The new hotel/residential tower would provide three levels of subterranean parking that would serve the entire development. Although the proposed Project would be taller than the existing buildings on site, the Project would not directly obstruct an existing public view of a scenic vista, as views of a scenic vista are not readily available from that location. Any existing, albeit limited, views to distant scenic vistas would be from private view points in the surrounding land uses. A significant impact occurs only when a proposed project adversely affects the public view of a scenic vista and, therefore, impacts to private views are not considered to be significant and no further analysis is required. Furthermore, pursuant to CEQA Section 21099(d) and ZI-2452, the Project would not result in a significant impact on aesthetics. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

Less Than Significant Impact. The Project Site is located in a highly urbanized area of the City of Los Angeles. There are no State-designated scenic highways or highways eligible for scenic designation in the Project Site vicinity. There are also no City-designated scenic highways in the Project Site vicinity.⁸ The nearest designated scenic highway to the Project Site is the Arroyo Seco Historic Parkway, a portion of the Pasadena Freeway (SR-110) north of the interchange with the Hollywood Freeway (US-101).⁹ This scenic highway is approximately two miles north of the Project Site and is not visible from the Project Site at the street level. The Project is not located along or within the scenic vistas nor viewsheds of the designated Arroyo Seco Historic Parkway scenic highway.

Thus, the Project would not substantially damage scenic resources such as rock outcroppings, protected trees, or historic buildings within a State scenic highway. Pursuant to CEQA Section 21099(d) and ZI 2452, the Project would not result in a significant impact on aesthetics. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

Less Than Significant Impact. The Project Site is located in a highly urbanized area of downtown Los Angeles' South Park neighborhood of the Central City Community Plan; therefore,

⁸ California Department of Transportation, California Scenic Highway Mapping System, Los Angeles County, website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/langeles.htm, accessed: May 2018.

⁹ California Department of Transportation, California Scenic Highway Mapping System, Los Angeles County, website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/langeles.htm, accessed: May 2018.

the applicable threshold with respect to the Project is consistency with applicable zoning and other regulations governing scenic quality.

The Project would include the rehabilitation and adaptive reuse of the existing four-story hotel with a maximum building height of 52 feet above grade, the development of a 14-story hotel expansion with a maximum building height of 172 feet above grade, and a new 27-story hotel/residential tower with a maximum building height of 315 feet above grade. The Project would extend beyond the height of the existing four-story hotel and two-story commercial industrial buildings on-site. Thus, the Project would result in a change in the visual character of the Project Site and surrounding area. Visual simulations of the Project as viewed in context with the area around the Project Site can be seen in Figures 2-26 and 2-27 in the Project Description.

Zoning Consistency

The Project's maximum building height would not exceed 315 feet (27 stories), as measured from grade to the highest point of the roof. The Project would redevelop a site that currently contains a four-story hotel, surface parking lot and two one-story and one two-story commercial industrial buildings in conjunction with the adaptive reuse and expansion of the existing hotel and construction of a new hotel and residential development with event/meeting space, ground-floor commercial retail space, and ground floor restaurant uses in two buildings above three subterranean parking levels.

Phase I Existing would remain four stories overall with a maximum height of 52 feet above grade; Phase I Expansion would be 14 stories with a maximum height of height of 172 feet above grade; and Phase II Hotel and Residential Tower would be 27 stories with a maximum building height of 315 feet above grade.

The existing four-story hotel is similar in height to the existing mixed-use residential building across Pico Boulevard from the Project Site, which is seven stories tall. Along Hope Street, the Project includes an outdoor third floor deck and several green walls at different levels. The Phase II Hotel and Residential Tower is two stories fronting Hope Street at the building line, stepping up to the full 27 stories in height toward the rear of the Project Site.

The Project site is located in Height District 4, which permits unlimited height and a 13:1 FAR. However, there is a D limitation on the site which restricts the FAR to 6:1 unless: (i) the project is approved under Section 512.4 for the transfer of floor area (TFAR) under the City Center Redevelopment Plan ("Redevelopment Plan"); (ii) the project is approved under Section 512.2 of the Redevelopment Plan for the rehabilitation and/or remodeling of existing buildings; or (iii) the project is approved pursuant to any TFAR procedure adopted by the City.

The existing hotel, built in 1914, 88 years prior to the adoption of the Redevelopment Plan in 2002, would be rehabilitated and remodeled as part of a unified development which includes the hotel expansion and new construction of the hotel and residential tower. The hotel has an existing FAR of approximately 3.3:1. Section 512.2 states that "[n]otwithstanding the maximum Floor Area Ratios [...] structures which existed in the Project Area prior to the adoption of this Plan may be expanded in size in connection with the rehabilitation or remodeling of such structures." This Section further provides that if the existing structure has a FAR of less than 6:1, then the expansion is limited to no more than 25 percent above the maximum FAR, or 7.5:1. As such, the

Section 512.2 exception applies to the Project and would be permitted to have a maximum FAR of approximately 7.5:1.

Other Scenic Quality Regulations

The *Downtown Design Guide: Design for A Livable Downtown* (Design Guide) integrates urban design standards and guidelines with new street and sidewalk standards for Downtown. The Design Guide defines criteria for building massing, street wall, ground floor treatment, and architectural detail and signage.

The resulting overall development would be larger than the immediately surrounding structures compared to the existing massing at the Project Site. This increased visibility would occur on nearby roadways and adjoining sidewalks bordering the site, and the greater height and mass would increase the visibility of the Project Site from nearby properties. Even with increased size, however, the Project would be generally consistent with the urban viewshed of the surrounding area even as the Project would be taller than existing buildings. The Project would be generally built to its adjacent right-of-way lot lines. To reduce the massing of the Project, the Project would be articulated with a variety of breaks along its frontage on Hope Street, which would also provide visual interest (see Figures 2-26 and 2-27 in the Project Description). The existing hotel would retain its four-story building mass with the 14-story Phase I Expansion set further back toward the alleyway. The Phase II Hotel and Residential Tower would provide similar massing with two stories fronting Hope Street at the property line and 13-story and 27-story portions of the building set further back toward the alleyway. A public paseo would provide mid-block pedestrian access from Hope Street to the existing alleyway, providing a physical break between the Phase I Expansion building and the Phase II Hotel and Residential Tower. This paseo would be open from ground level to the sky providing a visual corridor through the Project Site. The Project's massing would be similar to existing and planned mid- and high-rise buildings in the Project vicinity.

The buildings in the Project area vary in age and architectural style. The Project would adaptively reuse and rehabilitate the existing Morrison Hotel, built in 1914, while expanding and constructing new buildings on the block to the east and north, respectively, in a contemporary architectural style. As the Project is located within the South Park neighborhood of downtown Los Angeles, the Project buildings have been designed to be compatible with the nature of the existing community, which includes new and old industrial, residential, and general commercial uses in buildings varying from one level to skyscrapers. Conceptual renderings of the Project can be seen on Figures 2-26 and 2-27, Project Renderings, in the Project Description, which include views of the Project in context with its surroundings.

The articulation of each of the Project's buildings serves to resemble several buildings with height stepped down toward Hope Street. The Project's architectural material selection and color palette would contribute to the aesthetic character of surrounding environment. The design alternates between different textures, colors, materials, and distinctive architectural treatments and avoids dull and repetitive facades. As a result of the proposed building's architectural style and contemporary design, the Project would be effectively integrated into the aesthetics of the urban viewshed. Thus, the proposed design would not detract from the visual character or quality of the Project Site and its surroundings nor substantially degrade the existing visual character or quality of the site and its surroundings. The Project would be consistent with the criteria established in

the Design Guide. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact.

Light

The Project is located in a well-lit urbanized area of the City where there are moderate to high levels of ambient nighttime lighting, including street lighting, vehicle headlights, architectural and security lighting, and indoor building illumination (light emanating from structures that passes through windows). The Project Site is located within an urban environment; thus, light emanating from any one source contributes to the overall lighting impacts rather than being solely responsible for lighting impacts on a particular use. As uses surrounding the Project Site are already impacted by lighting from existing development within the area, any additional amount of new light sources must be noticeably visible to light-sensitive uses to have any notable effect.

The Project would have the potential to alter lighting patterns in the area of the Project Site as compared with the existing structures and surface parking on site. Night lighting for the Project would be provided to illuminate building entrances, driveways, commercial use, and for security. Although the amount of light emanating from the Project would represent an increase over current light levels, the Project would be designed to comply with LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property)¹⁰, which prohibits outdoor lighting sources from causing the windows and outdoor recreation/habitable areas of residential units from being illuminated by more than two foot candles, or from receiving direct glare from the light source; and any proposed signage would be required to comply with LAMC Section 14.4.4 E (Sign Illumination Limitations), which prohibits sign lighting from producing a light intensity of greater than three foot candles above ambient lighting as measured from the nearest residentially zoned property.

Additionally, headlights from vehicles entering and exiting the Project's subterranean parking levels from Hope Street at night would be an increased source of light due to the greater intensity of use at the site. However, light from vehicle headlights would not directly shine upon any nearby light-sensitive land use for any substantial amount of time as commercial land uses are located to the west of the Project Site across Hope Street and east of the Project Site across the alley, and commercial uses are not considered light-sensitive land uses.

It is anticipated that the amount of light emanating from the Project would represent an increase over current light levels. Even so, the Project's compliance with the City's regulatory compliance measures, including LAMC Sections 12.21 A.5(k), 14.4.4 E, and 93.0117, would require outdoor lighting to be designed and installed with shielding so that the source of the light (e.g., the bulb) cannot be seen from adjacent residential properties, the public right-of-way, or from above so as to minimize light trespass. Therefore, the Project would not create a new source of substantial light that would adversely affect day or nighttime views in the area.

¹⁰ Direct glare, as used in LAMC Section 93.0117, is a glare resulting from high luminance or insufficiently shielded light sources that is in the field of view.

Glare

Potential reflective surfaces in the Project vicinity include vehicles traveling and parked on streets in the vicinity of the Project Site and exterior building windows. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area.

The Project would incorporate both solid and glass surfaces. Exterior building materials of the proposed building would use various non-reflective material designed to minimize the transmission of glare from the Project's buildings. All proposed vehicle parking spaces would be located within three subterranean levels, thereby minimizing potential glare from vehicles. Furthermore, the Project's compliance with the City's existing regulations, including LAMC Section 93.0117 (Outdoor Lighting Affecting Residential Property), which prohibits outdoor lighting sources from causing the windows and outdoor recreation/habitable areas of residential units from being illuminated by more than two foot candles, or from receiving direct glare from the light source, would ensure potential glare impacts are not significant. Moreover, the Project would not use polished metals in its design. Therefore, the Project would not create a new source of substantial glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project Site is fully developed with a hotel, commercial structures, and a surface parking lot, and is located in a highly developed area of the City. According to the State Farmland Mapping and Monitoring Program's most recent Farmland mapping data for Los Angeles County, neither the Project site nor the surrounding area are designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.¹¹ Thus, Project implementation would not result in the loss of State-designated Farmland. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

¹¹ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, published July 2017, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed: April 2019.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned [Q]R5-4D-O. Thus, the Project Site is not zoned for agricultural use, nor are there any agricultural uses currently occurring at the Project Site or within the surrounding area. Additionally, according to the State's most recent Williamson Act land data, neither the Project Site nor the surrounding area are under a Williamson Act contract.¹² Therefore, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act contract. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

No Impact. In the City of Los Angeles, forest land is a permitted use in areas zoned OS (Open Space); however, the City does not have specific zoning for timberland or timberland production. The Project Site is zoned [Q]R5-4D-O. Thus, the Project Site is not zoned for forest land, timberland, or timberland production land uses and the Project would not conflict with existing zoning for forest land or timberland. No impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site is entirely developed with a hotel, commercial buildings, and a surface parking lot, and is located in a heavily developed area of the City. No forest land exists on or in the vicinity of the Project Site, and Project implementation would not result in the loss or conversion of forest land. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

No Impact. The Project Site is entirely developed and located in a heavily developed area of the City. No agricultural uses, designated Farmland, or forest land uses occur at the Project Site or within the surrounding area. As such, implementation of the Project would not result in the conversion of existing Farmland, agricultural uses, or forest land on- or off-site. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

¹² State of California Department of Conservation, Division of Land Resource Protection, State of California Williamson Act Contract Land, Los Angeles County Williamson Act FY 2015/2016, published 2016, website: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf, accessed: May 2018.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The potential impacts of a project are compared with the applicable Air Quality Management Plan (AQMP) to determine consistency. The City, including the Project Site, is within the South Coast Air Basin (Basin), and the South Coast Air Quality Management District (SCAQMD) is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. SCAQMD has responded to this requirement by preparing a series of AQMPs. The Governing Board of SCAQMD adopted the most recent of these on March 3, 2017. This AQMP, referred to as the 2016 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2016 AQMP identifies the control measures that will be implemented over a 20-year horizon to reduce major sources of pollutants. However, as construction and operation of the Project could result in an increase in emissions that could affect implementation of the 2016 AQMP, impacts may be significant. Therefore, the Project's air quality impacts and consistency with the 2016 AQMP will be further evaluated in the EIR.

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

Potentially Significant Impact. The Basin, wherein the Project Site is located, is currently in nonattainment for ozone, lead, and particulate matter. The construction and operation of a new intensity of development from the Project could emit criteria air pollutants that could potentially contribute to a cumulatively considerable net increase of criteria air pollutants. Therefore, impacts

may be significant and the Project's potential net increase of any criteria pollutants will be further evaluated in the EIR.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. SCAQMD currently recommends that impacts to sensitive receptors be considered significant when emissions generated at a project site cause localized pollutant levels to exceed state ambient air quality standards at sensitive receptors, or where a project causes an increase in local contaminants during construction and operation of the project. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential land uses are considered to be sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods of time. Recreational areas are considered to be moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function. Sensitive receptors near the Project Site include, but are not limited to, the Onyx mixed-use residential development at 242 W. Pico Boulevard, currently under construction, and the E on Grand mixed-use residential development at 1249 S. Grand Avenue. Additional sensitive receptors may also be identified during the preparation of the subsequent CEQA document. The construction and operation of a new intensity of development from the Project could emit concentrations of air pollutants near these sensitive receptors. Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. Therefore, impacts may be significant and the Project's potential to emit concentrations of air pollutants during construction and/or operation will be further evaluated in the EIR.

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

Less Than Significant Impact. The Project involves the construction and operation of a mixed-use hotel, residential, and commercial development, which includes land uses that are not typically associated with odor complaints according to the SCAQMD. The Project does not include industrial, agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding and other land-uses that typically result in emissions associated with odor complaints, based on the SCAQMD *CEQA Air Quality Handbook*. Potential emissions that may lead to odors during construction activities include equipment exhaust. However, these emissions and any associated odors would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. During Project operation, the Project would introduce new retail, restaurant, and residential uses to the area and would not result in activities that emit odors. Trash receptacles would be contained, located, and maintained in a manner that promotes odor control, no substantially adverse odor impacts are anticipated. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

No Impact. The Project Site is currently developed with a hotel, commercial buildings, and a surface parking lot within a highly developed area of the City. According to Exhibit C-2 of the L.A. CEQA Thresholds Guide, the Project Site and surrounding area are not identified as a biological resource area.¹³ Moreover, the Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.¹⁴ The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additionally, there are no known locally designated natural communities on the Project Site or in the immediate vicinity, nor is the Project Site located immediately adjacent to undeveloped natural open space or a natural water source that may otherwise serve as habitat for State- or federally-listed species. Therefore, the Project would have no impact on candidate, sensitive, or special status species and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

No Impact. The Project Site is currently developed with a hotel, commercial buildings, and a surface parking lot within a highly developed area of the City. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.^{15,16} As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. As such, implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

No Impact. The Project Site is currently developed with a hotel, commercial buildings, and a surface parking lot within a highly developed area of the City. The National Wetlands Inventory does not identify any wetlands in the vicinity of the Project Site.¹⁷ The State of California Wetlands

¹³ City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit C-2, Biological Resource Areas (Metro Geographical Area), page C-11.

¹⁴ Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET3 online database, website: <http://planning.lacounty.gov/gisnet3>, accessed: May 2018.

¹⁵ City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit C-2, Biological Resource Areas (Metro Geographical Area), page C-11.

¹⁶ U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed: May 2018.

¹⁷ U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed: May 2018.

does not identify any wetlands in the vicinity of the Project Site.¹⁸ Furthermore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. As such, implementation of the Project would not have a substantial adverse effect on federally protected wetlands. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

Less Than Significant Impact. The Project Site is currently developed with a hotel, commercial buildings, and a surface parking lot within a highly developed area of the City. According to the City of Los Angeles Conservation Element, wildlife corridors are land segments that connect two or more large habitat areas and provide a habitat for movement of animals between those areas.¹⁹ Although the City of Los Angeles has not formally identified wildlife corridors, studies have identified several wildlife corridors, including corridors between the Santa Susana Mountains and the Simi Hills and between the Simi Hills and the Santa Monica Mountains and connections between the Santa Monica Mountains and the Verdugo and San Gabriel Mountains. There are no wildlife corridors or native wildlife nursery sites in the Project vicinity. However, the 10 existing Indian Laurel Fig trees located within the public right-of-way would be removed during construction of the Project. Indian Laurel Fig trees are not protected under the LAMC and the City's Native Tree Protection Ordinance. These trees may provide temporary suitable habitat for nesting migratory birds, which are protected under the federal Migratory Bird Treaty Act (MBTA). The MBTA, which is an international treaty ratified in 1918, protects migratory nongame native bird species (as listed in 50 C.F.R. Section 10.13) and their nests. Additionally, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit the take of any birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). Tree removals would be undertaken pursuant to applicable City permits and requirements. The Project would be required to comply with these existing federal and State laws (i.e., MBTA and California Fish and Game Code, respectively). Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. Based on the Protected Tree Report (see Appendix A to this Initial Study), there are no existing trees located on the Project Site, and 10 existing street trees within the right-of-way adjacent to the Project Site.²⁰ The City's Protected Tree Ordinance (Ordinance No. 177,404 identifies four protected tree species which include the Oak tree, the Southern California Black Walnut, the Western Sycamore, and the California Bay. The 10 street

¹⁸ California Wetlands Portal, available at: https://www.mywaterquality.ca.gov/eco_health/wetlands/, accessed January 14, 2019.

¹⁹ City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Adopted September 2001, page II-31.

²⁰ Protected Tree Report, 828 Fifth Street, Suite 3 Santa Monica, California 90403, Cy Carlberg, April 19, 2018. See Appendix A to this study.

trees identified in the Protected Tree Report are all Indian Laurel Fig trees and therefore not protected species.

Therefore, construction of the Project would not affect any protected trees. Moreover, the Project proposes to provide approximately 34 new trees as part of the Project's landscape plan, consistent with the LAMC requirement of one tree for every four dwelling units. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

No Impact. The Project Site is currently developed with a hotel, commercial buildings, and a surface parking lot in a developed area of the City. No sensitive habitat areas are located on or adjacent to the Project Site. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.²¹ Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?

Potentially Significant Impact. Section 15064.5 of the State CEQA Guidelines defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource

²¹ California Department of Fish and Wildlife, California Regional Conservation Plans, October 2017, website: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed: May 2018.

listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

The Project Site includes three existing commercial buildings and the existing Morrison Hotel, built in 1914. The Morrison Hotel, located on the Project site at 1246-48 South Hope Street, was identified by SurveyLA as eligible for listing in the California Register of Historical Resources and for designation as a Los Angeles Historic-Cultural Monument. The Project proposes to rehabilitate and adaptively reuse the Morrison Hotel as part of the Project, and therefore a historical resources report will be prepared to analyze the existing building, its history, and the proposed reuse of the building. The Project has been designed with the intent to rely on the Secretary of the Interior Standards so that integrity of the existing historic ho is not compromised through the adaptive reuse of the Morrison Hotel and new construction of the new Hotel and Residential Tower.

The existing commercial buildings on the Project Site would also be demolished as part of the Project. According to review of historical data, the on-site commercial buildings were built by 1918. As the Project proposes to rehabilitate the hotel building and demolish the commercial buildings over 50 years in age. Therefore, impacts may be significant and the Project's potential to cause a substantial adverse change in the significance of a historical resource will be further evaluated in the EIR.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Potentially Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources.

Based on a review of City of Los Angeles Prehistoric and Historic Archaeological Sites and Survey Areas Map, the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.²² In addition, the Project Site is located in a highly urbanized area of the City of Los Angeles and has been subject to past disturbance, including grading and construction of the existing buildings and paving of the surface parking lot. Any archaeological resources that may have existed near the surface of the Project Site are likely to have been disturbed or previously removed. However, the Project would likely result in deeper excavations than previously performed on the site. As such, previously unknown archaeological resources may exist beneath the Project Site that could be uncovered during excavation activities and impacts may be significant and the Project's potential to cause a substantial adverse change in the significance of an archaeological resource will be further evaluated in the EIR.

²² City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-1 – Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, page 2.15-3.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. Phase I and II Environmental Site Assessment (ESA) investigations of the Project Site determined that historic uses of the property include a portion of Fiesta Park with open bleachers as of 1906 and the existing commercial building with retail and commercial uses as of 1913.²³ The Phase I and II ESAs did not find any evidence of cemeteries or burials in the historic records for the site.²⁴ As such, there are no known human remains within the Project Site. However, previously unknown human remains may exist beneath the Project Site that could be encountered during Project excavation and grading activities. While no formal cemeteries, other places of human internment, or burial grounds sites are known to occur within the immediate Project Site area, there is always a possibility that human remains could be encountered during construction. If previously unknown human remains are found during excavation, the Project would follow procedures as detailed in the California Health and Safety Code Section 7050.5. If human remains of Native American origin are discovered during Project construction, the Project would comply with State laws, which fall within the jurisdiction of the Native American Heritage Commission (Public Resources Code Section 5097), relating to the disposition of Native American burials. Therefore, through compliance with existing State regulations related to human remains, impacts to unknown human remains that could be inadvertently discovered at the Project Site would be less than significant, no mitigation measures are required, and no further evaluation of this topic is required in the EIR.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

²³ Phase I Environmental Site Assessment of 1220, 1224, 1240, 1246 South Hope Street and 427 West Pico Boulevard Los Angeles, California, Alpha Environmental, September 23, 2015; and Phase II Environmental Site Assessment Report, 1220-1246 S. Hope St. and 427 W. Pico Blvd., Los Angeles, California 90015, Andersen Environmental, November 13, 2015, page 17.

²⁴ Phase I Environmental Site Assessment of 1220, 1224, 1240, 1246 South Hope Street and 427 West Pico Boulevard Los Angeles, California, Alpha Environmental, September 23, 2015; and Phase II Environmental Site Assessment Report, 1220-1246 S. Hope St. and 427 W. Pico Blvd., Los Angeles, California 90015, Andersen Environmental, November 13, 2015.

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

Potentially Significant Impact. The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. Should the consumption of energy during Project construction and operation exceed available local or regional supplies or infrastructure, a significant impact could occur. Therefore, the Project's consumption of energy may be significant and will be further calculated and evaluated in the EIR.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. As discussed above, the Project would consume energy during construction and operation in the form of electricity, natural gas, and transportation fuel. The Project could result in a significant impact to state or local plans for renewable energy or energy efficiency if it failed to meet energy efficiency standards for equipment or prevented energy suppliers from meeting renewable energy source targets. Therefore, the Project's consumption of energy and its effects on renewable energy plans and energy efficiency requirements may be significant and will be further calculated and evaluated in the EIR.

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VII. GEOLOGY AND SOILS

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

The following analysis incorporates the findings of the *Preliminary Geotechnical Engineering Investigation* prepared by GeoConcepts, Inc., dated March 31, 2017 (“Geotechnical Report”) (the report is available as Appendix B of this Initial Study).

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture to built structures. Surface rupture of a fault generally occurs within 50 feet of an active fault line. The Project Site is not located within a designated Alquist-Priolo Earthquake Fault Zone.²⁵ There are several active faults in the metropolitan region, including the Sierra Madre Fault Zone along the south edge of the Sierra Madre Mountains, the Raymond Fault in San Marino, and the Hollywood and Santa Monica faults along the Hollywood Hills and Santa Monica Mountains. The nearest active fault is the Puente Hills Blind Thrust, a subsurface, horizontal fault plane that runs about 25 miles from Brea, across the lower San Gabriel Valley, going northwest into downtown Los Angeles, and further northwest ending just before Griffith Park.²⁶ Because the Puente Hills Fault is a horizontal fault with no line (“trace”) at the ground surface, it is not possible to provide a map distance from the Project Site to the fault; however, according to the City, the Project Site is within the Puente Hills Fault Zone.²⁷ In addition, the Project Site is not located within a City-designated Fault Rupture Study Area.²⁸ Thus, the potential for fault rupture at the Project Site would be low. Further, the Project would be required to comply with applicable state and local building and seismic codes and implement all site- and Project-specific design recommendations contained in a Geotechnical Engineering Investigation/GeoHazards Evaluation that would be submitted to the Los Angeles Department of Building and Safety for review and approval prior to Project Approval. Conformance with current Building Code requirements and site-specific design recommendations in the Geotechnical Engineering Investigation/GeoHazards Evaluation would minimize the potential for people on the Project Site to sustain loss, injury, or death as a result of fault rupture. The Project would involve the partial demolition, adaptive reuse, and expansion of an existing structure to be utilized for commercial and hotel purposes in accordance with allowed uses under existing zoning and no proposed uses would have the potential to directly or indirectly exacerbate existing potential for fault rupture. Therefore, impacts

²⁵ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2018.

²⁶ John H. Shaw, Andreas Plesch, James F. Dolan, Thomas L. Pratt, and Patricia Fiore, Puente Hills Blind-Thrust System, Los Angeles, California, Bulletin of the Seismological Society of America, Vol. 92, No. 8, pp. 2946–2960, December 2002.

²⁷ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2018.

²⁸ Los Angeles General Plan Safety Element, Exhibit A, Alquist–Priolo Special Study Zones & Fault Rupture Study Areas, p. 47 (November 1996).

would be less than significant and no mitigation is required. No further evaluation of this topic is required in the EIR.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The California Supreme Court ruling in *California Building Industry Assn. v. Bay Area Air Quality Management District* (62 Cal.4th 369) (*CBIA v. BAAQMD*) held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project, such as the potential for substantial adverse effects on people or structures from strong seismic ground shaking from earthquakes. The type of development expected to occur under the Project is typical of urban environments and would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Furthermore, there are no active or potentially active faults that traverse the Project Site. Based on the above, development of the Project would not directly or indirectly exacerbate seismic conditions on the Project Site or in the area, therefore, impacts related to strong seismic ground shaking would be less than significant.

Furthermore, a review of the geologic conditions at the Project Site indicates that the Project Site is located in the seismically active region of Southern California and, therefore, is susceptible to ground shaking during a seismic event. The nearest active fault to the Project Site is the Puente Hills Blind Thrust. The Puente Hills Fault is a subsurface, horizontal fault plane that runs about 25 miles from Brea, across the lower San Gabriel Valley, going northwest into downtown Los Angeles, and further northwest ending just before Griffith Park.²⁹ Because the Puente Hills Fault is a horizontal fault with no line ("trace") at the ground surface, it is not possible to provide a map distance from the Project Site to the fault; however, according to the City, the Project Site is within the Puente Hills Fault zone.³⁰

In addition to the Puente Hills Fault, other known active faults that could produce significant ground shaking at the Project Site include the San Andreas, Whittier Elsinore, San Fernando, Santa Susana, Newport-Inglewood, Malibu Coast, Hollywood, Raymond, Sierra Madre, and San Gabriel Faults are considered active faults capable of producing strong seismic waves (ground shaking) on the Project Site.³¹ Therefore, the Project Site is susceptible to ground shaking during a seismic event. However, Project construction would be consistent with all applicable provisions of the Los Angeles Building Code, the recommendations of the Geotechnical Report (see Appendix B of this Initial Study), and conditions of approval from LADBS Grading Division. Conformance with current Los Angeles Building Code requirements would minimize the potential for structures on the Project Site to sustain substantial damage during an earthquake as modern buildings are designed to resist ground shaking through the use of shear panels, moment frames, and reinforcement. The potential seismic hazard to the Project Site would not be higher than in most areas of the City or elsewhere in the region. Therefore, impacts would be less than

²⁹ John H. Shaw, Andreas Plesch, James F. Dolan, Thomas L. Pratt, and Patricia Fiore, Puente Hills Blind-Thrust System, Los Angeles, California, Bulletin of the Seismological Society of America, Vol. 92, No. 8, pp. 2946–2960, December 2002.

³⁰ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2018.

³¹ GeoConcepts, Inc., Preliminary Geotechnical Engineering Investigation, 1246 S. Hope Street & 427 W. Pico Boulevard, Los Angeles California, March 31, 2017, pp. 4-7.

significant with respect to risk of loss, injury, or death involving strong seismic ground shaking. No further evaluation of this topic is required in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction describes a phenomenon where cyclic stresses, which are produced by earthquake-induced ground motions, create excess pore pressures in cohesionless soils. As a result, the soils may acquire a high degree of mobility, which can lead to lateral spreading, consolidation and settlement of loose sediments, ground oscillation, flow failure, loss of bearing strength, ground fissuring, and sand boils, and other damaging deformations. This phenomenon occurs only below the water table, but after liquefaction has developed, it can propagate upward into overlying, non-saturated soils as excess pore water escapes. The possibility of liquefaction occurring at a given site is dependent upon the occurrence of a significant earthquake in the vicinity, sufficient groundwater to cause high pore pressures, and on the grain size, relative density, and confining pressures of the soil at the site.

According to the Geotechnical Report, the State of California Geologic Survey Seismic Hazard Zone, Hollywood Quadrangle Map, Earthquake Fault Zones and Seismic Hazard Zones Hollywood 7.5 Minute Quadrangle, the City of Los Angeles Safety Element³² and City of Los Angeles Department of Planning Zoning Information and Map Access System (ZIMAS) Parcel Profile Report³³ the Project Site is not located within an area identified as having potential for liquefaction.

Groundwater seeps were encountered at depths of 157.5 and 187.5 feet during the geotechnical investigation on the Project Site. Seasonal fluctuations of groundwater levels may occur by varying amounts of rainfall, irrigation and recharge. Based on the depth to groundwater and the dense nature of the alluvium soil, the Geotechnical Report determined that lateral spreads and seismically induced settlement should not pose any significant hazard to the Project. Furthermore, the Project would not propose deep mining operations or boring into the earth's crust into a known fault that could otherwise cause in whole or in part seismic-related ground failure. Additionally, LADBS would review the plans for consistency with the findings and recommendations of *Geotechnical Engineering Investigation* and the Building Code. LADBS would require that a *Final Geotechnical Engineering Investigation*, incorporating all findings and recommendations, be prepared and approved prior to the issuance of any grading or building permits. Therefore, impacts related to seismic-related ground failure including liquefaction would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

iv. Landslides?

No Impact. The Project Site and surrounding area consist of relatively flat topography. The Project Site is not located within an area identified by the City as having a potential for landslides,

³² City of Los Angeles Safety Element, Exhibit B: Areas Susceptible to Liquefaction in the City of Los Angeles, October 1993, page 49.

³³ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: July 2018.

or of a known landslide.^{34,35} Furthermore, the Project Site is not in the path of any known or potential landslides. Thus, the Project does not propose substantial alteration to the existing topography and would not directly or indirectly exacerbate existing environmental conditions related to landslides. Therefore, no impacts would occur, and no further evaluation of this topic is required in the EIR.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The Project Site is currently improved with a hotel, commercial buildings, and a surface parking lot. Nearly the entire approximately 1.29-acre Project Site is paved with impervious surfaces except for street tree planters. The area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. During construction, Project grading and excavation would expose relatively low amounts of soil for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, substantial erosion is unlikely to occur. Furthermore, during this period, the Project would be required to prevent the transport of sediments from the Project Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs would be detailed in the required Stormwater Pollution Prevention Program (SWPPP), which must be acceptable to the City and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) permit requirements. As part of the SWPPP, BMPs would be implemented during construction to reduce sedimentation and erosion levels to the extent possible. In addition, Project construction contractors would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. Therefore, any potential impacts related to soil erosion would be reduced to a less-than-significant level with compliance with regulatory requirements that include implementation of BMPs, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

Less Than Significant Impact. Potential impacts with respect to liquefaction and landslide potential are evaluated in Questions 6(a)(iii) and (iv) above.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Site is underlain by artificial fill and Quaternary earth materials. The Project Site is not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Site or in the general Project Site vicinity. The Project Site is not located over an old mine or a cave and will not induce an earthquake as explained above. Therefore, the Project will not result in subsidence. In addition, groundwater and petroleum are not currently

³⁴ State of California, California Geological Survey, Landslide Inventory Map of the Hollywood Quadrangle, April 2013.

³⁵ City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit C, Landslide Inventory & Hillside Areas, Adopted November 1996, page 51.

being extracted from the Project Site and would not be extracted as part of the Project. Thus, subsidence as a result of such activities would not occur. Furthermore, safe construction practices would be exercised through required compliance with the Building Code and conditions of approval provided by LADBS, which includes building foundation requirements appropriate to Project Site conditions.

Subsurface explorations, or borings, were performed by a hollow stem drill rig excavating into the underlying earth materials. Explorations were excavated to a maximum depth of 201 feet. The location of the borings are shown on the plot map in the Geotechnical Report and detailed descriptions of the earth materials encountered during the field exploration are provided in Appendix I to the Geotechnical Report (Appendix B of this Initial Study). Artificial fill was encountered during the geotechnical investigation on the Project Site in all four borings. Fill generally consists of sand to clayey silt with sand. The fill is likely the result of past grading or construction activities at the Project Site. Native soil was encountered beneath the fill. The Geotechnical Report recommends that the proposed building be supported on foundations that are embedded into alluvium. The Project would be required to incorporate this and all other recommendations of the Geotechnical Report as part of the Project approval and building permit process.

The Project in and of itself does not propose injection of water into the soils nor would it trigger an earthquake. The Project would not be located on a geologic unit or on soil that is unstable, or that would become unstable as a result of the Project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts related to soil stability would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

d. Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansion and contraction of volume can occur when expansive soils undergo alternating cycles of wetting (swelling) and drying (shrinking). During these cycles, the volume of the soil changes markedly, and can cause structural damage to buildings and infrastructure. Expansive soil was not encountered during the geotechnical site investigation. Nonetheless, construction of the Project would comply with the California Building Code and Los Angeles Building Code, which include building foundation requirements appropriate to site-specific conditions, the recommendations enumerated in the Geotechnical Report, and the conditions of approval from LADBS Grading Division. As such, the Project is not located on expansive soil conditions and consequently would not create direct or indirect risks to life or property would be created. Therefore, impacts would be less than significant with respect to expansive soils, and no mitigation measures are necessary. No further evaluation of this topic is required in the EIR.

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

No Impact. The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance, and treatment system operated by the City. The Project would connect to the existing wastewater system. No septic tanks or alternative disposal systems are

necessary, nor are they proposed. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. The Project Site is relatively flat, completely paved, and does not contain any unique geological features. There are no known paleontological resources within the Project Site.³⁶ Although the Project Site has been previously disturbed and developed since the 1890s, and no paleontological resources have been identified on site or in the vicinity, the Project Site and surroundings are within an area identified as having surface sediments with unknown fossils potential.³⁷ In addition, the Project would require additional ground disturbance that would likely involve deeper excavation than previously performed at the site into native soils that may contain paleontological resources and impacts may be significant and the Project's potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature will be further evaluated in the EIR.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on the earth that can be measured by wind patterns, storms, precipitation, and temperature. The construction and operation of the Project would have the potential to generate GHG emissions, either directly or indirectly. Therefore,

³⁶ City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-2 – Vertebrate Paleontological Resources in the City of Los Angeles, page 2.15-4.

³⁷ City of Los Angeles, Citywide General Plan Framework Final Environmental Impact Report, certified August 2001, Figure CR-3 – Invertebrate Paleontological Resource Sensitivity Areas in the City of Los Angeles, page 2.15-5.

impacts may be significant and the Project's generation of GHG emissions will be further evaluated in the EIR.

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

Potentially Significant Impact. The construction and operation of the Project would have the potential to generate GHG emissions, which may be inconsistent or in some way represent a substantial hindrance to employing the policies or obtaining the goals of GHG-reduction plans. Therefore, impacts may be significant and the Project's consistency with applicable plans, policies, and regulations adopted for the purpose of reducing the emission of greenhouse gases will be further evaluated in the EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in other hotel, residential, and commercial developments (e.g., cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Thus, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

Less Than Significant Impact. Due to the age of the existing hotel and commercial structures and potentially hazardous past industrial and auto-related uses that may have been associated with the Project Site, hazardous materials could be present on-site. Due to the age of the on-site buildings, asbestos-contained materials (ACMs) and lead-based paints (LBPs) may also be present in the existing buildings. Moreover, the Project Site is located within a designated Methane Zone, which indicates a potential for methane intrusions emanating from geologic formations.³⁸

During construction, any ACMs would be removed by a licensed abatement contractor in accordance with all federal, State and local regulations prior to demolition. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated ACMs to acceptable levels.

³⁸ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2018.

With respect to LBP, the contractor will comply with the OSHA Lead In Construction Standard and Cal/OSHA Construction Safety Orders, Lead Section 1532.1, Title 8, California Code of Regulations. Mandatory compliance with applicable federal and State standards and procedures would reduce risks associated with LBP to acceptable levels.

With respect to methane, the City adopted Ordinance No. 175,790 in March 2004. The Ordinance includes information describing the test protocols, design parameters, and installation procedures for the methane gas mitigation systems; and requires mitigation for methane gas intrusion into buildings located within a Methane Zone or Methane Buffer Zone as established under Sections 91.7101 et seq. of the Los Angeles Municipal Code. The Methane Investigation (Appendix C of this Initial Study) prepared for the Project Site in accordance with the City's regulations found no detectible reading of methane during the testing conducted at the Project Site as part of the investigation. With less than two inches of water-column gas pressure, the Project falls under Design Level III (see Table 1A in Appendix C), requiring compliance with the appropriate regulatory measures pursuant to the LAMC.³⁹ Therefore, compliance with the regulations governing methane gas and methane zones in the City (Section 91.7103 of the LAMC) would ensure that potential impacts would be less than significant.

The Phase I Environmental Site Assessment (Phase I) conducted by Alpha Environmental on September 23, 2015 determined that the Site was historically utilized for industrial/commercial purposes including auto repair, gasoline station, car wash, and wholesale distribution. Based on this historic data, and because the former gasoline station was considered a recognized environmental condition (REC), a Phase II Environmental Site Assessment (Phase II) was conducted by Andersen Environmental on November 13, 2015 (see Appendix D of this Initial Study for both the Phase I and Phase II). The Phase II included a geophysical survey in select areas of the Project Site and four borings in an attempt to evaluate if historical operations have significantly impacted the subsurface.

The likely former locations of underground storage tanks (USTs) and dispenser islands associated with the previous gasoline station were identified by the geophysical survey. Four soil borings were advanced in the area to a maximum depth of 10 feet below ground surface (bgs), and one soil sample from each boring was collected and analyzed for total petroleum hydrocarbons with carbon chain characterization (TPHcc). A soil vapor probe was installed in each boring, and soil vapor samples were collected from all probes for volatile organic compounds (VOCs) analysis.

As discussed in additional detail in the Phase II (see Appendix D of this Initial Study), the assessment did not detect any petroleum hydrocarbons in soil. Two VOCs (methylene chloride and styrene) were detected at low concentrations. California Human Health Screening Levels (CHHSLs) have not been established for these VOCs, which are low-priority pollutants and not typically drivers in vapor intrusion investigations. Furthermore, since the detected concentrations are almost an order of magnitude below the Regional Screening Levels (RSLs) that have been

³⁹ It should be noted that while the methane investigation (Appendix C) refers to the Project requiring a "passive methane mitigation system," a project's design pursuant to the appropriate methane mitigation system based on the LAMC's methane testing requirements is a regulatory compliance measure, and does not constitute an actual measure to mitigate a potentially significant project-specific impact under CEQA. Therefore, the requirement for a passive methane mitigation system does not constitute a mitigation measure.

established by the US Environmental Protection Agency (USEPA) for Industrial Air, their presence is not considered to represent a risk to human health.

Based on the investigative results of the Phase II indicating the absence of USTs, the presence of only low concentrations of VOCs that do not pose an unacceptable risk to human health, or evidence that an on-Site release has significantly impacted the subsurface, the Phase II did not recommend any further action or mitigation.

Compliance with the regulations governing ACMs, LBPs, methane gas and methane zones in the City (Section 91.7103 of the LAMC) would ensure that potential impacts would be less than significant; no mitigation measures are required. No further evaluation of this topic is required in the EIR.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. There are no existing or planned school sites within a quarter-mile of the Project Site. The nearest school to the Project Site is Alliance Dr. Olga Mohan High School at 644 West 17th Street, approximately 0.37 miles to the southwest. Construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids, and project operation would involve the limited use of hazardous materials typically used in the maintenance of mixed-use projects incorporating hotel, residential, and commercial uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies and petroleum products). However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, State, and local regulations. As such, the use of such materials would not create a significant hazard to any nearby schools, albeit none are within a quarter-mile. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.

As identified by the Phase I conducted for the Project Site, the Project Site is listed on multiple databases researched by Environmental Data Resources, Inc., including Environmental Data Resources' proprietary database of historic gas stations (EDRUS Hist Auto Stat) and Resource and Recovery Conservation Act's Database of Small Quantity Generators (RCRA-SQG).⁴⁰ Based on this historic data, and because the former gasoline station was considered a recognized environmental condition (REC), a Phase II Environmental Site Assessment (Phase II) was

⁴⁰ Phase I Environmental Site Assessment of 1220, 1224, 1240, 1246 South Hope Street and 427 West Pico Boulevard Los Angeles, California, Alpha Environmental, September 23, 2015, page 44.

conducted by Andersen Environmental on November 13, 2015 (see Appendix D of this Initial Study for both the Phase I and Phase II). The Phase II included a geophysical survey in select areas of the Project Site and four borings in an attempt to evaluate if historical operations have significantly impacted the subsurface.

As discussed above under question (d), the likely former locations of underground storage tanks (USTs) and dispenser islands associated with the previous gasoline station were identified by the geophysical survey. Four soil borings were advanced in the area to a maximum depth of 10 feet below ground surface (bgs), and one soil sample from each boring was collected and analyzed for total petroleum hydrocarbons with carbon chain characterization (TPHcc). A soil vapor probe was installed in each boring, and soil vapor samples were collected from all probes for volatile organic compounds (VOCs) analysis.

As discussed in additional detail in the Phase II (see Appendix D of this Initial Study), the assessment did not detect any petroleum hydrocarbons in soil. Two VOCs (methylene chloride and styrene) were detected at low concentrations. California Human Health Screening Levels (CHHSLs) have not been established for these VOCs, which are low-priority pollutants and not typically drivers in vapor intrusion investigations. Furthermore, since the detected concentrations are almost an order of magnitude below the Regional Screening Levels (RSLs) that have been established by the US Environmental Protection Agency (USEPA) for Industrial Air, their presence is not considered to represent a risk to human health.

Based on the investigative results of the Phase II indicating the absence of USTs, the presence of only low concentrations of VOCs that do not pose an unacceptable risk to human health, or evidence that an on-Site release has significantly impacted the subsurface, the Phase II did not recommend any further action or mitigation. Therefore, the Project would not create a significant hazard to the public or the environment; no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

No Impact. The Project Site is not located within any airport's influence area nor within two miles of an existing airport.⁴¹ The nearest airports are Santa Monica Airport, approximately 10 miles to the west of the Project Site, and Los Angeles International Airport, approximately 10 miles southwest of the Project Site. Therefore, no safety hazards or excessive noise from airports would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan, the Project Site is located approximately 800 feet to the west of Figueroa Street, a

⁴¹ Los Angeles County Airport Land Use Commission, Airports and Airport Influence Areas, June 2012, website:http://planning.lacounty.gov/assets/upl/project/ALUC_Airports_June2012_rev2d.pdf, accessed: May 2018.

designated disaster route, which may be utilized for an evacuation route during an emergency.⁴² Project construction activities would not require temporary street and/or lane closure(s) on Figueroa Street as far as 800 feet from the Project Site. If lane closures are necessary to local streets adjacent to the Project Site, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. With regards to operation, the Project would comply with access requirements from the Los Angeles Fire Department (LAFD) and would not impede emergency access within the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures would be required. No further analysis of this topic is required in the EIR.

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

Less Than Significant Impact. The Project Site is located within Fire District No. 1, which is an area of the City wherein additional developmental regulations are required to be implemented to address fire hazards.⁴³ Additional developmental regulations include adding a roof covering; building with walls, floors, roofs, and supporting structural members that have a minimum of one-hour fire-resistance-rated constructions; and other provisions detailed in Volume 2, Chapter 72, Section 7204 of the Los Angeles Building Code. However, the Project Site is located within a highly developed area of the City and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not within a Very High Fire Hazard Severity Zone,⁴⁴ nor is the Project Site or surrounding area within a wildland fire hazard area.⁴⁵ Therefore, the Project would not directly or indirectly expose people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. Impacts related to wildland fires would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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⁴² Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, website: <http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>, accessed: May 2018.

⁴³ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2018.

⁴⁴ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2018.

⁴⁵ City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildlife Hazard Areas in the City of Los Angeles, Adopted November 1996, page 53.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The Los Angeles Regional Water Quality Control Board (LARWQCB) issued a Municipal Storm Water NPDES Permit (No. CAS004001) in December 2001 that requires new development and redevelopment projects to incorporate storm water

mitigation measures. Under the Municipal Storm Water NPDES Permit, redevelopment is defined as any land-disturbing activity that “results in the creation, addition, or replacement of 5,000 sf or more of impervious surface area on an already developed site.”⁴⁶ Depending on the type of project, either a Standard Urban Stormwater Mitigation Plan (SUSMP) or a Site Specific Mitigation Plan is required to reduce the quantity and improve the quality of rainfall runoff that leaves the project site. SUSMPs are required for the following uses:

- Single-Family Hillside Residences over one acre
- Housing developments (including single-family homes, multi-family homes, condominiums, and apartments) of ten or more units
- Industrial/Commercial developments of one acre or more of impervious surface area
- Automotive service facilities (SIC 5013, 5014, 5541, 7532-7534, and 7536-7539)
- Retail gasoline outlets
- Restaurants (SIC 5812)
- Parking lots with 5,000 square feet or more of surface area, including accessory driveways, or with 25 or more parking spaces
- Projects located in, adjacent to, or discharging directly to a designated Environmentally Sensitive Area (ESA)

The Project would be required to implement a SUSMP. The Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe). Additionally, for construction activities, the Applicant would be required to prepare and implement a SUSMP, in accordance with Chapter IX, Division 70 of the LAMC and the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SUSMP would detail the treatment measures and Best Management Practices (BMPs) to control pollutants and an erosion control plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of Project development. As Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the NPDES Construction General Permit (Order No. 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with NPDES requirements, a Storm Water Pollution Prevention (SWPP) Plan would be developed and implemented during Project construction. Construction-phase housekeeping measures for control of contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides would be contained within the project SWPP Plan. The SWPP Plan would contain BMPs to minimize primarily construction-related water quality impacts, but also contains some permanent BMPs. The SUSMP consists of structural BMPs built into the project for ongoing water quality purposes over the life of the Project. The Project would also be required to comply with the City’s Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. Therefore, impacts

⁴⁶ County of Los Angeles LID Ordinance, Title 12, Section 12.84.

would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

Potentially Significant Impact. Operation of the Project would use a municipal water supply and does not propose the use of any wells or other means of extracting groundwater. The City also imports the majority of its potable water supply from sources outside the Los Angeles Basin. Though the Project would not extract groundwater or use wells, potential impacts to groundwater resources and supply may result due to the development of the Project. A water resources report for the Project Site would assess and account for potential impacts to groundwater supplies and the local groundwater table. Therefore, impacts may be significant and the Project's potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that sustainable groundwater management may be impeded will be further evaluated in the EIR.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. There are no streams or rivers that traverse the Project Site. The entire Project Site and the majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. The Project Site is relatively flat and grading on the site would not alter existing landforms and drainage patterns. As the Project Site is entirely developed, stormwater is conveyed via the existing drainage network on site to curb drains to the west along South Hope Street and to the south along Pico Boulevard. During construction, grading and excavation would expose limited amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading and excavation processes, no substantial erosion would occur. Furthermore, during this period, the Project would be required to prevent the transport of sediments from the project site by stormwater runoff and winds through the use of appropriate BMPs. These BMPs would be detailed in a SWPPP, which must be acceptable to the City and in compliance with the NPDES Stormwater Regulations.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the structure and paving, while the remaining portions of the Project Site would be covered with irrigated landscaping. The Project's proposed landscaped areas would reduce stormwater runoff and reduce peak flows. No exposed areas subject to erosion would be created or affected by the Project. During operation, the Project would implement BMPs to ensure compliance with SUSMP and LID requirements. Thus, the Project would not alter the existing drainage pattern of the site or surrounding area such that substantial erosion, siltation, or on- or off-site flooding would occur. Therefore, impacts would be less than significant, and no mitigation measures are required. No further analysis of this issue is not required in the EIR.

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

Less Than Significant Impact. There are no streams or rivers that traverse the Project Site. The Project Site is relatively flat and grading on the site would not alter existing landforms and drainage patterns. The Project Site is currently developed with commercial buildings, a hotel, and surface parking areas. The Project Site is not located adjacent to a stream or river. The majority of the area surrounding the Project Site is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by the Project. The Project Site and vicinity are served by existing storm drains along Hope Street that empty into 18-inch drainage pipes along Pico Boulevard.⁴⁷

During construction, a SUSMP implemented in accordance with Chapter IX, Division 70 of the LAMC and the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity would control the rate and amount of surface runoff from the site. The SUSMP would detail the treatment measures and BMPs to control pollutants and an erosion control plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of Project development. Construction-phase housekeeping measures for control of contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides would be contained within the Project SWPP Plan. The SWPP Plan would contain BMPs to minimize primarily construction-related water quality impacts, but also contains some permanent BMPs.

The Project would be required to comply with the City's LID Ordinance and the Project SUSMP. The SUSMP consists of structural BMPs built into the Project for ongoing water quality purposes over the life of the Project. During operation, the Project would be required to control stormwater runoff using best management practices, including site specific measures incorporated into the final Project plans, which would be reviewed by the Bureau of Engineering (BOE) prior to issuance of grading and building permits. Thus, the Project would not substantially increase the rate or amount of surface runoff on the Project site in a manner which would result in flooding on- or off-site. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. As discussed in 10(a) and 10(c(ii)) above, the Project would be required to control stormwater runoff using best management practices, including site specific measures incorporated into the final Project plans, which would be reviewed by BOE prior to issuance of grading and building permits. Final plan check by BOE would ensure that adequate capacity is available in the storm drain system prior to Project approval. Stormwater runoff would continue to drain into the existing City storm drain system. The Project Site and vicinity are served by existing storm drains that empty into 18-inch pipes along Pico Boulevard. The Applicant would be responsible for providing the necessary storm drain infrastructure improvements to connect

⁴⁷ Navigate LA. Website <http://navigatela.lacity.org/navigatela/>. Accessed August 2018.

with the existing drainage system. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

iv. Impede or redirect flood flows?

No Impact. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map, the Project Site is within Zone X – Other Areas, which is a designation for areas determined to be outside the 100-year flood hazard area.⁴⁸ Thus, the Project Site is not located within a designated 100-year flood plain area, and the Project would not place structures that would impede or redirect flood flows within a 100-year flood plain. Therefore, no impacts related to flooding would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

No Impact. Inundation of water, including through 100-year storm flooding, tsunami, seiche, can result in the release of pollutants as floodwaters that have encountered such pollutants (such as oil and grease deposits on driving surfaces, trash, and stored chemicals required for cleaning and maintenance) recede. However, according to FEMA Flood Insurance Rate Map, the Project Site is within Zone X – Other Areas, which is a designation for areas determined to be outside the 100-year flood hazard area.⁴⁹ In addition, according to the Safety Element of the City General Plan, the Project Site is not located within a flood control basin or within a potential inundation area.⁵⁰ The Project Site is also not within an area potentially impacted by a tsunami as the Project Site is approximately 14 miles from the Pacific Ocean.⁵¹ There are also no major water bodies in the vicinity of the Project Site that would put the site at risk of inundation by seiche. As such, no flooding, tsunami, or seiche events which would result in the release of pollutants due to inundation are expected to impact the Project Site. Therefore, no impacts would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

Potentially Significant Impact. As detailed in 10.(a) above, the Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe) and would be required to prepare and implement a SUSMP, in accordance with Chapter IX, Division 70 of the LAMC and the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SUSMP consists of structural BMPs built into the project for ongoing water quality purposes over the life of the Project. Additionally, in accordance with NPDES requirements, a Storm Water Pollution Prevention (SWPP) Plan would be developed and implemented during Project construction. Therefore, the Project would not conflict with or

⁴⁸ Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1620F, effective September 26, 2008, website: <http://msc.fema.gov/portal>, accessed: May 2018.

⁴⁹ Federal Emergency Management Agency, Flood Insurance Rate Map, Los Angeles County, California, FEMA Map Number 06037C1620F, effective September 26, 2008, website: <http://msc.fema.gov/portal>, accessed: May 2018.

⁵⁰ City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, Adopted November 1996, page 59.

⁵¹ City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, Adopted November 1996, page 59.

obstruct implementation of a water quality control plan. Impacts would be less than significant, and no mitigation measures are required.

However, as discussed in 10.(b) above, though the Project would not extract groundwater or use wells, potential impacts to groundwater resources and supply may result due to the development of the Project, particularly during subterranean excavation if groundwater is encountered. Therefore, impacts may be significant and the Project's potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that sustainable groundwater management may be impeded in conflict with sustainable groundwater management plans will be further evaluated in the EIR.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located within the boundaries of the Central City Community Plan, in the highly urbanized South Park district of downtown Los Angeles, and is currently improved with a hotel, three commercial buildings, and a surface parking lot. The Project would renovate and expand the existing hotel, demolish the three existing commercial buildings, and construct a new mixed-use tower containing hotel uses, residential units, and commercial space. The Project would provide a mix of hotel, residential, and commercial retail/restaurant uses. As such, the Project would be an infill Project providing uses in keeping with the mixed-use character of the surrounding area. The Project Site is bound by a commercial industrial building to the north, an alleyway, mixed-use residential, commercial, and surface parking to the east, Pico Boulevard and mixed-use residential to the south, and Hope Street, commercial industrial uses, and a surface parking to the west. All proposed development would occur within the boundaries of the Project Site as it currently exists. The majority of the Central City Community Plan area consists of a mix of commercial and industrial uses, with multi-family residential, public facilities, and open space located in smaller pockets in the area. Given its infill character, the Project would not introduce land uses that are inconsistent with development in the local area or affect existing land use relationships. Therefore, the Project would not physically divide an established neighborhood or community and related impacts would be less than significant, and no mitigation measures would be required. No further evaluation of this topic is required in the EIR.

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

Potentially Significant Impact. The Project Site is located in the Central City Community Plan Area, the Los Angeles State Enterprise Zone, the Greater Downtown Housing Incentive Area, the Adaptive Reuse Incentive Area, and the City Center Redevelopment Project Area. The Project requires several discretionary approvals including a Vesting Tentative Tract, Site Plan Review, Conditional Use Permits, and a parking reduction. Therefore, impacts may be significant and a consistency analysis of the Project's entitlements and approvals with applicable land use plans, policies, and regulations will be further evaluated in the EIR.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. The Project Site is located within the boundaries of the State-designated LA Downtown Oil Field; ⁵² however, the Project Site is fully developed and no oil wells are present. ^{53, 54}

The Project Site is also located within an MRZ-2 Zone. ⁵⁵ MRZ-2 sites contain potentially significant sand and gravel deposits which are to be conserved; however, much of the area within the MRZ-2 sites in the City was developed with structures prior to the MRZ-2 classification and, therefore, is unavailable for extraction (e.g., the Project Site). ⁵⁶ The Project Site has been

⁵² City of Los Angeles Department of City Planning, Los Angeles City General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, Adopted November 1996, page 55.

⁵³ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2018.

⁵⁴ California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Well Finder, website: <https://maps.conservation.ca.gov/doggr/wellfinder/#close>, accessed May 2018.

⁵⁵ City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, Adopted September 2001.

⁵⁶ City of Los Angeles Department of City Planning, Los Angeles City General Plan Conservation Element, Exhibit A, Mineral Resources, Adopted September 2001.

developed with a hotel and three commercial buildings as early as 1914 and is not used for oil or mineral extraction. The Project would not affect any extraction activities associated with the LA Downtown Oil Field as the Project would not involve, directly or indirectly, the extraction of oil or the removal of existing oil wells. Existing wells within the LA Downtown Oil Field would continue extraction activities unaffected by the construction and operation of the Project, and there would be no impact on existing or future regionally important mineral extraction sites. Furthermore, the Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. Therefore, impacts related to mineral resources would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

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

Less Than Significant Impact. The Project Site is within the State-designated boundaries of the LA Downtown Oil Field and an MRZ-2 Zone. However, there are no oil extraction operations, drilling, or mining of mineral resources at the Project Site. Moreover, existing wells associated with the LA Downtown Oil Field would continue extraction activities unaffected by the construction and operation of the Project. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the State or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, impacts related to availability of a locally-important mineral resource recovery site would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Potentially Significant Impact. The Project Site is improved with a hotel, three commercial buildings, and a surface parking lot. Existing sources of noise at the Project Site generally consist of noise from commercial and hotel activity, traffic along area roadways, and vehicles using the parking lot. Construction of the Project would require the use of heavy equipment for demolition, grading, excavation and foundation preparation, the installation of utilities, paving, and building construction. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. During operation of the Project, on-site operational noise would be generated by heating, ventilation, air conditioning (HVAC) equipment installed for the new structures, and by use of outdoor amenity areas. Therefore, implementation of the Project has the potential to result in an increase in ambient noise levels during both construction and operation. The EIR will describe the existing noise environment, and the potential increases in noise in the project area from construction equipment including peak estimated construction noise levels that could occur at the nearest sensitive uses during construction of the Project, and from operation of the Project including noise generated by on-site equipment or increase in traffic.

Construction and operation of the Project would increase both temporary and long-term noise, which could exceed City noise standards. Therefore, impacts may be significant and the Project's potential to generate temporary or permanent increase in ambient noise will be further evaluated in the EIR.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of surfaces is called groundborne noise. The construction of the Project, including excavation and grading activities, may generate groundborne vibration and groundborne noise and could therefore result in adverse impacts related to building damage or human annoyance. Therefore, impacts may be significant and the Project's potential to generate excessive groundborne vibration or noise levels will be further evaluated in the EIR.

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

No Impact. As discussed in response to Checklist Question VIII(e) above, the Project Site is not located within the vicinity of a private airstrip, an airport's influence area, or within two miles of a public or public use airport. The nearest public airports are Santa Monica Airport, approximately 10 miles to the west of the Project Site, and Los Angeles International Airport, approximately 10 miles southwest of the Project Site. Moreover, the Project Site is not located within an existing or

projected noise contour associated with an airport.⁵⁷ The nearest private airstrip is located at the Goodyear Blimp Base Airport in the City of Carson, approximately 13 miles south from the Project Site. Therefore, no impacts related to airport noise would occur, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project would include approximately 135 residential units, 450 hotel guest rooms, a basement bar and lounge, a ground floor restaurant and bar, additional restaurant and retail space, meeting room space, and pools and amenities. The Project would generate new residents on-site as well as employees at the hotel and within the commercial spaces. Therefore, impacts may be significant and the Project's potential to induce substantial unplanned population growth in an area will be further evaluated in the EIR.

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

Potentially Significant Impact. A significant impact may occur if a project would result in displacement of existing housing units, including people within occupied housing units, necessitating construction of replacement housing elsewhere. The existing hotel on the Project Site has 111 Single Room Occupancy (SRO) units and has been unoccupied since 2008. Consistent with the settlement agreement in *Wiggins v. Board of Directors of the Community Redevelopment Agency of the City of Los Angeles* (Case No. BC 276472 r/t BC 277539) (the "Wiggins Settlement Agreement") and Development Guidelines and Controls for Residential Hotels in the City Center and Central Industrial Redevelopment Project Areas, replacement units

⁵⁷ Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, Airport Influence Area figures, adopted December 19, 1991, revised December 4, 2004; website: <http://planning.lacounty.gov/view/alup/>; accessed: May 2018.

will be provided for under a Replacement Housing Plan (RHP). The RHP will be submitted to the Community Redevelopment Agency of the City of Los Angeles (CRA/LA) Board of Commissioners for approval prior to issuance of building permits for the Project. The location, design, and construction and/or rehabilitation of the replacement units will occur following and separate from the City's approval of the Project. Therefore, impacts may be significant and the Project's potential to displace substantial numbers of people and housing will be further evaluated in the EIR.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Fire protection?

Potentially Significant Impact. The nearest fire station to the Project Site is Fire Station 10, located at 1335 South Olive Street, approximately 0.4 miles to the southeast of the Project Site. Fire Station 9 is located at 430 East 7th Street, approximately 1.3 miles northeast of the Project Site. The Project would include approximately 135 residential units, 450 hotel guest rooms, a basement bar and lounge, a ground floor restaurant and bar, additional restaurant and retail space, meeting room space, and pools and amenities, which would generate new residents, employees, and visitors on the Project Site. The redevelopment of the Project Site and subsequent increase in on-site population could increase the number of emergency calls to LAFD. Therefore, impacts may be significant and the Project's potential to result in a substantial adverse physical impact related to Fire Protection Services will be further evaluated in the EIR.

b. Police protection?

Potentially Significant Impact. The Project Site is serviced by the Central Community Police Station, located at 251 East 6th Street, Los Angeles, CA 90014, approximately one-mile northeast

of the Project Site. The Project Site is located in Reporting District 182 (Central Area). The Project would include approximately 135 residential units, 450 hotel guest rooms, a basement bar and lounge, a ground floor restaurant and bar, additional restaurant and retail space, meeting room space, and pools and amenities on the Project Site, which would generate new residents, employees, and visitors on the Project Site. The redevelopment of the Project Site and subsequent increase in on-site population could increase the number of service calls to LAPD from the Project Site, as well as responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons could potentially increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. Therefore, impacts may be significant and the Project's potential to result in a substantial adverse physical impact related to Police Protection Services will be further evaluated in the EIR.

c. Schools?

Less Than Significant Impact. As shown in Table 3-1 below, the Los Angeles Unified School District (LAUSD) schools that serve the Project Site include 9th Street Elementary School, John H. Liechty Middle School, and, as the Project Site is within the Belmont Zone of Choice, students in this zone have the choice of attending Miguel Contreras Learning Complex, Ramon C. Cortines School of Visual & Performing Arts, Belmont Senior High, and Edward R. Roybal Learning Center.

Table 3-1
LAUSD Schools Serving the Project Site

School Type (Grade)	School Name	Location	Distance from the Project Site
Elementary School (Grades K-6)	9 th Street	835 Stanford Avenue	1.5 miles
Middle School (Grades 7-8)	John H. Liechty	650 S. Union Avenue	1.6 miles
Senior High School (Grades 9-12)	Miguel Contreras Learning Complex	322 Lucas Avenue	1.7 miles
Senior High School (Grades 9-12)	Ramon C. Cortines School of Visual & Performing Arts	450 N. Grand Avenue	2.3 miles
Senior High School (Grades 9-12)	Belmont Senior High	1575 W. 2nd Street	2.1 miles
Senior High School (Grades 9-12)	Edward R. Roybal Learning Center	1200 Colton Street	2.9 miles
<i>Source: LAUSD Resident School Finder, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, Accessed: November 2018.</i>			

The Project would include approximately 135 residential units, 450 hotel guest rooms, a basement bar and lounge, a ground floor restaurant and bar, additional restaurant and retail space, meeting room space, and pools and amenities on the Project Site, which would generate new residents, employees, and visitors on the Project Site. During construction, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project because construction workers move from construction site to construction site throughout the region. However, with the construction of 135 residential units, future Project residents may have school-aged children that could generate increased demand on LAUSD schools currently serving the Project Site. As shown in Table 3-2, below, using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate

approximately 56 new students consisting of 31 elementary school students, 8 middle school students, and 17 high school students.

Table 3-2
Estimated Project Student Generation

Land Use	Size	Students Generated ^{a, b}		
		Elementary (K-6)	Middle School (7-8)	High School (9-12)
Residential Units	135 units	31	8	17
^a Based on Student Generation factors provided in the Los Angeles Unified School District, Level 1 Developer Fee Study, March 2017 ^b Rounded to the nearest whole number. Source (table): EcoTierra Consulting, 2018.				

Although it is likely that some of the students generated by the Project would already be enrolled in LAUSD schools, charter, or private schools, for a conservative analysis, it is assumed that all students generated by the Project would be new to the school district.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. Development fees are required to be paid pursuant to development conditions of approval. Pursuant to SB 50, the payment of these school fee amounts provided for in Government Code Sections 65995, 65995.5, and 65995.7 would constitute full and complete mitigation for school facilities. That is to say, SB 50 states that the exclusive method of mitigating the impact of school facilities according to CEQA is to pay the maximum school fees and that such fees are "deemed to provide full and complete school facilities mitigation" related to the adequacy of school facilities when considering approval or the establishment of conditions for the approval of a development project (Government Code 65996[a] and [b]).

Pursuant to California Government Code Section 65995.5-7, the LAUSD has Level 1 Fees on for new residential and commercial construction, based on square footage, within the boundaries of the LAUSD. Accordingly, project applicant(s) are required to pay school fees to LAUSD to offset the impact of additional student enrollment at schools serving the project area.

Pursuant to State law, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the Project's impacts on any schools. Thus, impacts on school facilities during Project construction would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

d. Parks?

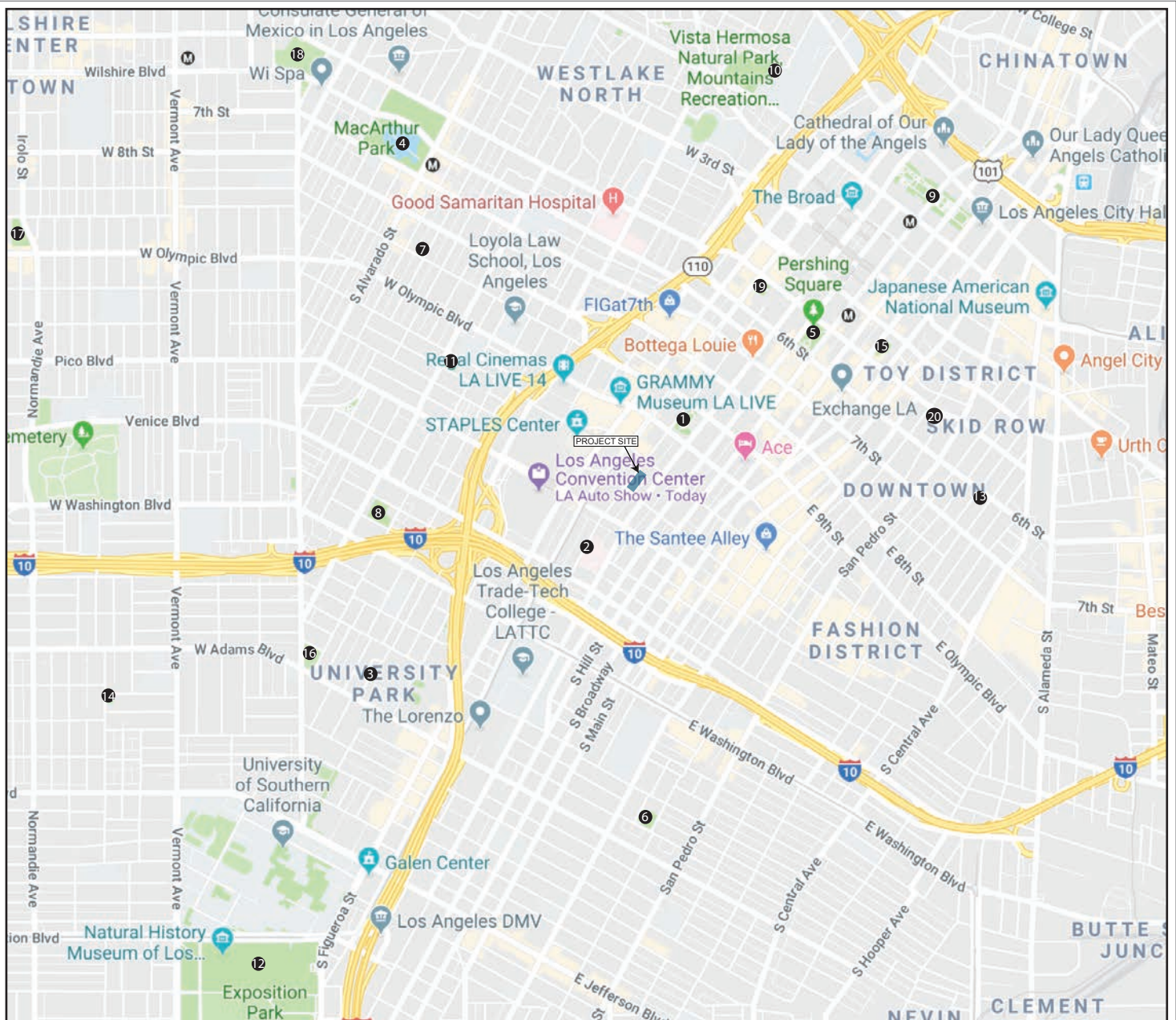
Less Than Significant Impact. As shown on Figure 3-1, Parks and Recreational Facilities within Two-Mile Radius, there are no existing parks or recreational facilities currently located on the Project site or within the immediate surrounding area. The Project would generate new residents, employees, and visitors on the Project Site. Based on the total number of residential units proposed, the Project is required to provide 15,525 square feet of open space pursuant to LAMC Section 12.21 G.2. The Project would meet this requirement by providing 11,450 square feet of outdoor common open space, 2,167 square feet of indoor common open space via a recreation

room, and 3,750 square feet of private residential balconies, for a total of 16,278 square feet of usable open space. The Project would provide up to approximately 25,202 square feet of amenity space (covered and uncovered) throughout levels 2, 3, 13, 14, and 27, thus offsetting the need for additional park or recreational facilities in the area. Also refer to Figures 2-28 through 2-35 in Project Description, for open space illustrations.

In addition, the City's new Park Fee Ordinance became effective on January 11, 2017. The Ordinance amends Sections 12.21, 12.33, 17.03, 17.12 and 17.58 of the LAMC, deletes Sections 17.07 and 19.01 of the LAMC, and adds Section 19.17 of the LAMC. The Ordinance increases Quimby fees, provides a new impact fee for non-subdivision projects, eliminates the deferral of park fees for market rate projects that include residential units, increases the fee spending radii from the site from which the fee is collected, provides for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updates the provisions for credits against park fees. In addition, pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of \$200 per dwelling unit on the construction of all new dwelling units and modification of existing dwelling units to be paid to the Department of Building and Safety. These taxes are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites.

Furthermore, LAMC Section 17.12, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses for residential subdivisions through parkland dedication, payment of in-lieu fees, and/or provision of on-site open space, subject to determination by the Advisory Agency. Implementation of regulatory requirements would ensure that impacts to parks would be less than significant through compliance with applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Therefore, impacts would be less than significant no mitigation measures are required and no further evaluation of this topic is required in the EIR.

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- | | |
|---|--|
| 1: Grand Hope Park: 919 S. Grand Avenue | 11: Plunge City Park: 1300 W. Olympic Boulevard |
| 2: Work Park: 1338 S. Hope Street | 12: Exposition Park: 700 Exposition Park Drive |
| 3: St. James Park: Adams Boulevard and Severance Street | 13: Gladys Park: 808 E. 6th Street |
| 4: MacArthur Park: 2230 6th Street | 14: Richardson Family Park: 2700 S. Budlong Avenue |
| 5: Pershing Square: 532 S. Olive Street | 15: Spring Street Park: 428 S. Spring Street |
| 6: Trinity Park: 2415 Trinity Street | 16: Hoover Recreation Center: 101 W. 25th Street |
| 7: Hope and Peace Park: 843 S. Bonnie Brae Street | 17: Seoul International Park: 3250 San Marino Street |
| 8: Toberman Park: 1725 Toberman Street | 18: Lafayette Recreation Center: 625 S. Lafayette Park Place |
| 9: Grand Park: 200 N. Grand Avenue | 19: Maguire Gardens: S. Flower Street |
| 10: Vista Hermosa Natural Park: 100 N. Toluca Street | 20: San Julian Park: 312 E. 5th Street |

■ Project Site

Source: Google Maps, December 2018.



Figure 3-1
Parks and Recreational Facilities within Two-Mile Radius

e. Other public facilities?

Potentially Significant Impact. The Project would generate new residents, employees, and visitors on the Project Site, which could result in an increased demand for library materials and expanded library facilities. In addition to libraries, roadway improvements and/or dedications may be required by the Bureau of Engineering, the construction of which could have an adverse significant impact. Therefore, the Project's potential to increase demand on public facilities will be further evaluated in the EIR.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Less Than Significant Impact. As discussed in Checklist Question 13.(a)(iv) and shown on Figure 3-1, Parks and Recreational Facilities within Two-Mile Radius, there are no existing parks or recreational facilities currently located on the Project site or within the surrounding area. Based on the total number of residential units proposed, the Project is required to provide 15,525 square feet of open space pursuant to LAMC Section 12.21G.2. The Project would meet this requirement by providing 11,450 square feet of outdoor common open space, 2,167 square feet of indoor common open space via a recreation room, and 3,750 square feet of private residential balconies, for a total of 17,367 square feet of usable open space. The Project would also provide up to approximately 25,202 square feet of amenity space (covered and uncovered) throughout levels 2, 3, 1-3, 14, and 27, thus offsetting the need for additional park or recreational facilities in the area. Also refer to Figures 2-28 through 2-35 in Project Description, for open space illustrations. In addition, the City's new Park Fee Ordinance became effective on January 11, 2017. The Ordinance amends Sections 12.21, 12.33, 17.03, 17.12 and 17.58 of the LAMC, deletes Sections 17.07 and 19.01 of the LAMC, and adds Section 19.17 of the LAMC. The Ordinance increases Quimby fees, provides a new impact fee for non-subdivision projects, eliminates the deferral of park fees for market rate projects that include residential units, increases the fee spending radii from the site from which the fee is collected, provides for early City consultation for subdivision

projects or projects with over 50 units in order to identify means to dedicate land for park space, and updates the provisions for credits against park fees. In addition, pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of \$200 per dwelling unit on the construction of all new dwelling units and modification of existing dwelling units to be paid to the Department of Building and Safety. These taxes are placed into a “Park and Recreational Sites and Facilities Fund” to be used exclusively for the acquisition and development of park and recreational sites.

Furthermore, LAMC Section 17.12, the City’s parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses for residential subdivisions through parkland dedication, payment of in-lieu fees, and/or provision of on-site open space, subject to determination by the Advisory Agency. Implementation of regulatory requirements would ensure that impacts to parks would be less than significant through compliance with applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Therefore, impacts related to substantial physical deterioration of parks or other recreational facilities would be less than significant. Therefore, no mitigation measures are required and no further evaluation of this topic is required in the EIR.

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

Less Than Significant Impact. As discussed in Checklist Question 13(a)(iv) and shown on Figure 3-1, Parks and Recreational Facilities within Two-Mile Radius, there are no existing parks or recreational facilities currently located on the Project site or within the surrounding area. Based on the total number of residential units proposed, the Project is required to provide 15,525 square feet of open space pursuant to LAMC Section 12.21G.2. The Project would meet this requirement by providing 11,450 square feet of outdoor common open space, 2,167 square feet of indoor open space via a recreation room, and 3,750 square feet of private residential balconies, for a total of 17,367 square feet of usable open space. The Project would also provide up to approximately 25,202 square feet of amenity space (covered and uncovered) throughout levels 2, 3, 13, 14, and 27, thus offsetting the need for additional park or recreational facilities in the area. Also refer to Figures 2-28 through 2-35 in Project Description, for open space illustrations.

As discussed above, implementation of regulatory requirements would ensure that impacts to parks would be less than significant through compliance with applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Therefore, construction or expansion of recreational facilities would not be necessary and impacts would be less than significant.

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XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project would require the use of a variety of construction vehicles throughout the Project's construction. Typical construction schedules create trips outside of the traffic peak hours. It is anticipated that there would be no hauling during the PM peak hour and that construction workers would arrive at the Project Site prior to the AM peak hour. During Project operation, the Project would generate new residents on the Project Site in addition to on-site employees and visitors of the hotel and commercial spaces, which would result in increased vehicle trips on area roadways that could degrade the existing performance levels of roadway facilities. To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, the Congestion Management Program (CMP) was enacted by Proposition 111. The CMP designated a transportation network including all State highways and some arterials within the County to be monitored by local jurisdictions. If a standard of measure deteriorates on the CMP network, then local jurisdictions must prepare a deficiency plan to be in conformance with the CMP program. The CMP requires that new development projects analyze potential project impacts on CMP monitoring locations if an EIR is prepared for the project. When a CMP analysis is required, the CMP methodology requires the analysis of traffic conditions at all CMP arterial monitoring intersections where a project would add 50 or more trips during either the AM or PM weekday peak hours. The CMP also requires that traffic studies analyze mainline freeway monitoring locations where a project would add 150

or more trips in either direction during either AM or PM weekday peak hours. The Project would cause traffic and vehicular trips to be directed to the roadway segments and intersections adjacent to and in the vicinity of the Project Site. Therefore, the impact of the Project's additional traffic on CMP intersections and freeway segments may be significant and will further be evaluated in the EIR.

To encourage and facilitate the use of public transportation and bicycle use, the proposed Project would provide approximately 76 short-term bicycle parking spaces and 149 long-term bicycle parking spaces, for a Project total of 225 bicycle parking spaces. This proposed quantity of bicycle parking spaces would comply with LAMC requirements. Nonetheless, operation of the Project would generate new residents, employees, and visitors on the Project Site which may increase the demand for public transit and affect the performance of existing transit conditions in the area. Therefore, the Project's potential impacts may be significant. The Project's consistency with applicable programs, plans, ordinances, and policies related to traffic and circulation, pedestrian flows, mass transit utilization, and bicycle routes will be further evaluated in the EIR.

b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? ⁵⁸

Potentially Significant Impact. To address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California, the Congestion Management Program (CMP) was enacted by Proposition 111. The CMP designated a transportation network including all State highways and some arterials within the County to be monitored by local jurisdictions. If a standard of measure deteriorates on the CMP network, then local jurisdictions must prepare a deficiency plan to be in conformance with the CMP program. The CMP requires that new development projects analyze potential project impacts on CMP monitoring locations if an EIR is prepared for the project. When a CMP analysis is required, the CMP methodology requires the analysis of traffic conditions at all CMP arterial monitoring intersections where a project would add 50 or more trips during either the AM or PM weekday peak hours. The CMP also requires that traffic studies analyze mainline freeway monitoring locations where a project would add 150 or more trips in either direction during either AM or PM weekday peak hours. The Project would cause traffic and vehicular trips to be directed to the roadway segments and intersections adjacent to and in the vicinity of the Project Site. Therefore, the impact of the Project's additional traffic on CMP intersections and freeway segments may be significant and will be evaluated further in the EIR.

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

Less Than Significant Impact. The Project proposes a land use that would complement the surrounding urban development and utilizes the existing roadway network. The Project would have two vehicular access points: one from Hope Street and one from the alleyway. This vehicle

⁵⁸ While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles travelled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on LADOT's adopted methodology under its Transportation Impact Study Guidelines, which requires use of LOS to evaluate traffic impacts of a Project.

access would provide access into the shared parking garage for the Project within the three subterranean parking levels. The Project's driveways would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. The Project's driveways would also conform to the City's applicable emergency access requirements as set forth by the Department of Transportation (LADOT) and the LAFD. Furthermore, the Project design would be reviewed by the Department of City Planning, LADBS, and the LAFD during the City's plan review process to ensure all applicable requirements are met. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

d. Result in inadequate emergency access?

Potentially Significant Impact. Construction of the Project could result in temporary blockage of adjacent street lanes. While it is expected that the majority of construction activities for the Project would be confined on-site, short-term construction activities may temporarily affect emergency access on segments of adjacent streets during certain periods of the day. Therefore, impacts may be significant and the Project's potential to result in inadequate emergency access will be further evaluated in the EIR.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

Potentially Significant Impact. Assembly Bill 52 (AB 52), signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact Tribal Cultural Resources (TCRs) and establishes a formal notification and, if requested, consultation process for California Native American Tribes as part of CEQA. TCRs include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. Consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a project.

The Project Site is located in a highly urbanized area of the Central City Community Plan Area of the City of Los Angeles, and has been partially disturbed by past development activities. However, the Project would involve the excavation and export of approximately 45,900 cubic yards of on-site soils for the development of three levels of subterranean parking. Thus, the potential exists for the discovery of tribal cultural resources and impacts may be significant. The Project's potential to cause a substantial adverse change in the significance of tribal cultural resources will therefore be further analyzed in the EIR.

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. Pursuant to AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. As mentioned above, a TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included

in a local register of historical resources. A substantial adverse change to a TCR is a significant effect on the environment under CEQA. Because the Project would include excavation to depths of approximately 31 feet below grade, and thus, not previously disturbed in order to construct three levels of subterranean parking, and given that the AB 52 Tribal notification/consultation process has not been completed to date, this potential impact will be further evaluated in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project would increase the demand for water and the generation of wastewater, consequently increasing the demand of treatment facilities compared

to existing conditions such that physical expansion of the treatment facilities or construction of a new treatment facility may be required. In addition, the amount and direction of stormwater flow could be altered by the development of the Project as demolition, rehabilitation and adaptive reuse, and construction of the Project would alter the Project Site. The Project would result in an increase in consumption of electrical power and natural gas during both construction and operation such that existing supply facilities may need to be expanded or relocated. The Project would also require the construction of new on-site telecommunication lines and connection to existing off-site lines. Therefore, impacts may be significant and the Project's potential to increase the demand of treatment facilities, require or result in new facilities, and to result in significant environmental effects resulting from expansion or relocation of electrical and natural gas supply facilities will be further evaluated in the EIR.

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

Potentially Significant Impact. The demand for water on the Project Site would increase with the development of approximately 135 residential units, 450 hotel guest rooms, a basement bar and lounge, a ground floor restaurant and bar, additional restaurant and retail space, meeting room space, and pools and amenities. Therefore, impacts may be significant and the Project's ability to serve the project given available water supplies during normal, dry, and multiple-dry years will be further evaluated in the EIR.

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

Potentially Significant Impact. The Project would increase the generation of wastewater conveyed to the wastewater treatment system. Further analysis is required to determine whether the Project's added wastewater could result in a significant impact on the City's wastewater treatment capacity. Therefore, the Project's potential to increase wastewater will be further evaluated in the EIR.

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

Potentially Significant Impact. The Project would generate construction and demolition solid waste as well as daily solid waste during the operation of the Project, which would be recycled or landfilled. Therefore, impacts may be significant and the Project's potential to exceed state or local standards or capacity infrastructure or to impair the attainment of solid waste reduction goals will be further evaluated in the EIR.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The Project would generate solid waste that is typical of a residential and neighborhood commercial mixed-use project, and would be consistent with all federal, State, and local statutes and regulations regarding proper disposal. Additionally, the amount of solid waste that would be generated by the Project would be further reduced through source reduction and recycling programs.

LABS's Solid Resources Citywide Recycling Division develops and implements source reduction, recycling, and reuse programs in the City. The Solid Resources Citywide Recycling Division provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste (HHW), and helps create markets for recycled materials. In order to help meet the diversion goals of California Integrated Waste Management Act of 1989 (AB 939) and the City, the City adopted the Citywide Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January 1, 2011, requires that all haulers and contractors responsible for handling construction and demolition waste obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation prior to collecting, hauling and transporting construction and demolition waste. It requires that all construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors, where the waste would be recycled to the extent feasible.

AB 939 was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible. Specifically, AB 939 required cities and counties to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by 2000. AB 939 also required each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties were required to maintain 50 percent diversion past the year 2000. The City surpassed the state-mandated 50 percent diversion rate for 2000 and achieved a 58.8 percent diversion rate. In 2001, the City adopted a 70 percent diversion rate goal by the year 2020. During his term of office, Mayor Antonio Villaraigosa revised the diversion rate goal to 75 percent by 2013, and the City adopted a new goal of "Zero Waste" by the year 2025. The City had a diversion rate of 20.6 percent in 1990, 46.0 percent by 1995, and 65.2 percent by 2000. By the end of 2011, the City achieved a diversion rate of 76.4 percent.

This landfill diversion rate exceeds the 75 percent diversion mandate by 2020 set forth in AB 374.⁵⁹ The Bureau of Sanitation's Solid Resources Citywide Recycling Division (SRCRD) develops and implements source reduction, recycling, and re-use programs in the City.⁶⁰ The SRCRD provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste, and helps create markets for recycled materials.⁶¹ Furthermore, AB 341 requires multi-family residential developments with five units or more to provide for recycling services on site.

In March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) requires that development projects include a recycling area or room of specified size on the Project Site.

The Project includes a trash and recycling room on level B1, and trash and recycling rooms on each floor; the Project would comply with these and all regulations related to construction and

⁵⁹ California Department of Resources and Recycling, California's 75 Percent Initiative, website: <http://www.calrecycle.ca.gov/75percent/>, accessed: April 2016.

⁶⁰ Los Angeles Bureau of Sanitation, Solid Resources, Construction and Demolition Recycling Guide, website: http://www.lacitysan.org/solid_resources/recycling/c&d.htm, accessed: April 2016.

⁶¹ Los Angeles Bureau of Sanitation, Solid Resources, Construction and Demolition Recycling Guide, website: http://www.lacitysan.org/solid_resources/recycling/c&d.htm, accessed: April 2016.

operational solid waste. Therefore, solid waste impacts from operation of the Project would be less than significant and no mitigation measures are required. No further evaluation of this topic is required in the EIR.

XX. WILDFIRE

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. As detailed in 9.(f) above, the Project Site is located approximately 800 feet to the west of Figueroa Street, a designated disaster route, which may be utilized for an evacuation route during an emergency.⁶² Project construction activities would not require temporary street and/or lane closure(s) on Figueroa Street as far as 800 feet from the Project Site. If lane closures are necessary to local streets adjacent to the Project Site, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate emergency access and circulation. With regards to operation, the Project would comply with access requirements from the Los Angeles Fire Department (LAFD) and would not impede emergency access within the

⁶² Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, website: <http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>, accessed: May 2018.

Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures would be required. No further analysis of this topic is required in the EIR.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. As detailed in 9.(g) above, the Project Site is located within a highly developed area of the City and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not within a Very High Fire Hazard Severity Zone,⁶³ nor is the Project Site or surrounding area within a wildland fire hazard area.⁶⁴ Therefore, the Project would not exacerbate wildfire risks and no exposure of Project occupants to pollutant concentrations from a wildfire would occur. Accordingly, no impact would occur and no mitigation is required. No further evaluation of this topic is required in the EIR.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. The Project would involve the partial demolition, adaptive reuse, and expansion of an existing structure in the highly urbanized South Park neighborhood of downtown Los Angeles. No roads, fuel breaks, or emergency water sources would be installed or maintained. Installation of any required power lines or other utilities would be done in accordance with applicable City building codes and utility provider policies. However, as detailed in 9.(g) above, the Project Site is located within Fire District No. 1, which is an area of the City wherein additional developmental regulations are required to be implemented to address fire hazards.⁶⁵ Additional developmental regulations include adding a roof covering; building with walls, floors, roofs, and supporting structural members that have a minimum of one-hour fire-resistance-rated constructions; and other provisions detailed in Volume 2, Chapter 72, Section 7204 of the Los Angeles Building Code. The Project would be required to comply with all developmental regulations. Compliance with all building code, developmental regulations, and utility providers requirements and policies would ensure that the Project would not exacerbate fire risks and impacts would be less than significant. No further evaluation of this topic is required in the EIR.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. The Project would be required to comply with all development regulations and City building codes with regard to fire safety and would not exacerbate the

⁶³ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2018.

⁶⁴ City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D, Selected Wildlife Hazard Areas in the City of Los Angeles, Adopted November 1996, page 53.

⁶⁵ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: May 2018.

potential for fire at the Site. Any installation of on-site power lines required to provide the Project with electricity and connections to existing power lines would be conducted in coordination and under the supervision of the utility provider. Further, the Project Site and the surrounding vicinity are flat and no major slopes that would be susceptible to flooding or landslide are located nearby. Accordingly, the Project would not expose people or structures to such hazards and impacts would be less than significant. No further evaluation of this topic is required in the EIR.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The Project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. As noted in the foregoing analysis, significant impacts may result to

Cultural Resources. Therefore, the Project's potential to eliminate important examples of the major periods of California history or prehistory will be further evaluated in the EIR.

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

Potentially Significant Impact. For the purpose of this Initial Study, a significant cumulative impact may occur if a project, in combination with the related projects, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. The impacts of the Project could potentially combine with the impacts of related projects. For those environmental issues discussed above that are to be analyzed in the EIR, the EIR will include an analysis of the cumulative impacts associated with those environmental issues. The following is a list of the cumulative impacts analyses to be included in the EIR:

- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems

As the following analysis provides, due to the distance of most of the related projects from the Project Site and specific on-site and surrounding conditions, the Project would not result in significant cumulative impacts for any of the following environmental issues:

Aesthetics

Development of the Project in conjunction with other development projects would likely result in an intensification of existing prevailing land uses in an already heavily urbanized area of the City. Development of any additional projects is expected to generally occur in accordance with adopted plans and regulations, including LAMC requirements regarding building heights, setbacks, massing and lighting. With respect to the overall visual quality of the surrounding neighborhood, similar to the Project, any additional projects would be required to submit a landscape plan and signage plan (if proposed) to the Department of City Planning for review and approval prior to the issuance of grading permits. Any approvals granted to related projects are expected to allow landscape and signage that would be aesthetically compatible with the surrounding neighborhood. Additionally, as a qualifying infill project within a TPA in accordance with State

CEQA Statute Section 21099(d), and pursuant to SB 743 and ZI No. 2452, the Project would not have a significant impact with regard to visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impacts as a matter of law. Therefore, the Project would not have cumulatively considerable aesthetic impacts. Other qualifying infill projects within a TPA would similarly not result in significant impacts. Cumulative impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required.

Agriculture and Forestry Resources

Development of the Project in combination with other development projects would not result in the conversion of State-designated Farmland or existing agricultural activities or zoning to non-agricultural uses. The Project Site and surrounding area are also not under a Williamson Act contract. Moreover, the Project Site is not zoned for forest land, timberland, or Timberland Production, nor would the Project result in the loss of forest land. Thus, the Project would not contribute to a cumulative loss of forest land or conversion to non-forest land uses. Therefore, no cumulative impacts would occur and no mitigation measures are required, nor would the Project result in a cumulatively considerable impact. No further evaluation of this topic is required.

Biological Resources

As discussed above, the Project would not result in a potentially significant impact to biological resources. The Project Site is currently developed with a hotel, commercial buildings, and a surface parking lot in a highly developed area of the City. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. As discussed above, neither the Project Site nor adjacent areas are within a biological resource area or Significant Ecological Area. The Project Site does not contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Furthermore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. Tree removals would be undertaken pursuant to applicable City permits and requirements. The Project would be required to comply with these existing federal and State laws (i.e., MBTA and California Fish and Game Code, respectively). Thus, the Project would not have a considerable contribution to any significant cumulative biological resource impact. Therefore, impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic is required.

Mineral Resources

As discussed above, the Project would result in a less than significant impact on mineral resources. The Project would not involve mineral extraction activities, nor are any such activities presently occurring on the Project Site. The Project Site is within the State-designated boundaries of the LA Downtown Oil Field and an MRZ-2 Zone. However, there are no oil extraction operations, drilling, or mining of mineral resources at the Project Site. Moreover, existing wells associated with the LA Downtown Oil Field would continue extraction activities unaffected by the construction and operation of the Project. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the State or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local

general plan, specific plan, or land use plan. Thus, the Project would not have a considerable contribution to a potential cumulative impact on mineral resources, and cumulative impacts would be less than significant. No mitigation measures are required, and no further evaluation of this topic is required.

Wildfire

As discussed above, the Project would result in a less than significant impact on wildfire. The Project would result in a temporary, insignificant impact on Figueroa Street, which is a designated disaster route, during construction. Moreover, the Project is located within a highly developed area of the City that does not include wildlands or high fire hazard terrain or vegetation. The Project would comply with all development regulations, and compliance with all building code, development regulations, and utility providers' requirements and policies would ensure that the Project would not exacerbate fire risks and impacts would be less than significant. Likewise, other development projects in the Project vicinity would also be located in a highly developed area in the City and subject to similar development regulations. The Project would not have a considerable contribution to a potential cumulative impact on wildfire, and cumulative impacts would be less than significant. No mitigation measures are required, and no further evaluation of this topic is required.

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

Potentially Significant Impact. The analysis contained in this Initial Study concludes that the Project may result in potentially significant impacts. Therefore, potentially significant impacts may result which will be further evaluated in the EIR.