From:	Anthony Kornarens <khlawfirm@aol.com>
Sent time:	10/05/2020 04:16:52 PM
To:	mindy.nguyen@lacity.org; cpc@lacity.org
Subject:	Re: Appeal of the Vesting Tentative Tract Map No. VTT-82152 for the Hollywood Center Project; Case Nos. ENV-2018-2116-EIR, CPC- 2018-2114-DB-MCUP-SPR, CPC-2018-2115-DA, and VTT-82152 ; SCH 2018051002
Attachments:	LA CEQA Thresholds Guide Excerpts 2006.pdf

Attached are portions of the City of Los Angeles CEQA Thresholds Guide (2006) referenced in the submission of the Vedanta Society of Southern California that I submitted a few minutes ago on behalf of the Vedanta Society of Southern California.

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-----Original Message-----
From: Anthony Kornarens <khlawfirm@aol.com>
To: mindy.nguyen@lacity.org <mindy.nguyen@lacity.org>; cpc@lacity.org <cpc@lacity.org>
Sent: Mon, Oct 5, 2020 3:49 pm
Subject: Appeal of the Vesting Tentative Tract Map No. VTT-82152 for the Hollywood Center Project; Case Nos. ENV-2018-2116-EIR, CPC- 2018-2114-DB-MCUP-SPR, CPC-2018-2115-DA, and VTT-82152 ; SCH 2018051002

See attached:

Submission Of Vedanta Society Of Southern California in support of Appeal of the Vesting Tentative Tract Map No. VTT-82152 for the Hollywood Center Project; Case Nos. ENV-2018-2116-EIR, CPC- 2018-2114-DB-MCUP-SPR, CPC-2018-2115-DA, and VTT-82152 ; SCH 2018051002

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L.A. CEQA THRESHOLDS GUIDE

Your Resource for Preparing
CEQA Analyses in Los Angeles

City of Los Angeles
2006

E.1. GEOLOGIC HAZARDS

1. INITIAL STUDY SCREENING PROCESS

A. Initial Study Checklist Questions

VI.a.i): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

VI.a.ii): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

VI.a.iii): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

VI.a.iv): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

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

VIII.j): Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

B. Introduction

Geologic processes that result in geologic hazards include: surface rupture, ground shaking, ground failure, tsunamis, seiches, landslides, mudflows, and subsidence of the land.[1] Because the region is generally considered to be geologically active, most projects will be exposed to some risk from geologic hazards, such as earthquakes. Thus, significant geologic impacts exceed the typical risk of hazard for the region.

[1] *Sediment and erosion are addressed in E.2. SEDIMENTATION AND EROSION.*

Surface ruptures are the displacement and cracking of the ground surface along a fault trace. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two, typically confined to a narrow zone along the fault. The effects of ground shaking, the actual trembling or jerking motion of the ground during an earthquake, can vary widely across an area and depend on such factors as earthquake intensity and fault mechanism, duration of shaking, soil conditions, type of building, and other factors. Ground failure results from the cyclical ground acceleration generated during an earthquake, producing landslides, ground cracking, subsidence and differential settlement. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils.

Tsunamis are large ocean waves generated by large-scale, short-duration submarine earthquakes. Tsunami waves are capable of traveling great distances (over 1,000 miles) and damaging low-lying coastal regions. Seiches are waves formed from oscillations in enclosed or restricted bodies of water (i.e., harbors, lakes). Seiches can cause water to overtop reservoirs and lakes.

Mudflows and landslides are the downslope movement of soil and/or rock under the influence of gravity. Mudflow and landslide processes are influenced by factors such as thickness of soil or fill over bedrock, steepness and height of slope, physical properties of the fill, soil or bedrock materials and moisture content. These factors may increase the effective force of gravity upon a slope, decrease the ability of a slope to resist gravitational influence or a combination of the two, which can lead to mudflows and landslides.

Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the Earth's surface, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. Settlement is the gradual downward movement of a structure due to compression of the soil below the foundation. The principal cause of subsidence is the extraction of subsurface liquids, whereas settlement results from the compression of soils due to the weight of the structure or by surcharging following the placement of fill.

Construction is regulated by the Los Angeles Building Code, Sections 91.000 through 91.7016 of the Los Angeles Municipal Code (LAMC). The Los Angeles Building Code provides requirements for construction, grading, excavations, use of fill, and foundation work including type of materials, design, procedures, etc., which are intended to limit the probability of occurrence and the severity of consequences from geological hazards. Necessary permits, plan checks, and inspections are also specified.

C. Screening Criteria

- Is the project located in an area susceptible to unusual geologic hazards considering the following:
  - Designation on official maps and databases;
  - Past episodes on-site or in the surrounding area; and
  - Physical properties of the site, including the topography, soil or underlying bedrock (including thickness of bedrock and soil compressibility, strength, moisture content, and distribution)?
- Would the project include any of the following:
  - Placement of structures designed for regular occupancy or infrastructure on fill; or
  - Active or planned extraction (removal) of mineral resources, groundwater, oil, or natural gas on-site or in the surrounding area?

A "yes" response to any of the preceding questions indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration, or EIR may be required. Refer to the Significance Threshold for Geologic Hazards, and review the associated Methodology to Determine Significance, as appropriate.

A "no" response to all of the preceding questions indicates that there would normally be no significant Geologic Hazard impact from the proposed project.

D. Evaluation of Screening Criteria

Review the description of the proposed project, project site, and surrounding area. To assist in determining whether the project is located in an area of known or suspected geologic hazard, consult the following maps and databases:

- Environmental and Public Facilities Maps, including:
  - Alquist-Priolo Special Study Zones and Fault Rupture Study Areas,
  - Inundation and Tsunami Hazard Areas,

- Areas Susceptible to Liquefaction,
- Landslide Inventory and Hillside Areas,
- Areas Containing Significant Mineral Deposits, and
- Oil Field and Oil Drilling Areas;

- ZIMAS (Zone Information & Map Access System): http://zimas.lacity.org

- Navigate LA: http://navigatela.lacity.org/

- Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) for tsunami hazards

Using the above information, field research, published reports, or other appropriate maps or studies, as available, assess whether the project is located in an area susceptible to geologic hazards. Consider past episodes on site or in the surrounding area; steepness/height of slopes; physical properties of the soil; the presence of fill; or extraction of resources below the surface. If necessary, consult with the Bureau of Engineering or Department of Building and Safety.

Compare this information to the Screening Criteria.

2. DETERMINATION OF SIGNIFICANCE

A. Significance Threshold

A project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

B. Methodology to Determine Significance

Environmental Setting

In a description of the environmental setting, include the following information:

- Description of the physical setting and geology, such as the topography, steepness and height of slopes or cliffs, physical properties of the soil and underlying bedrock, proximity to bodies of water, presence of fill, and extraction or mining activities;

- Identification of the geologic processes that may result in geologic hazards on the project site or in the surrounding area; and

- Summary of requirements and/or policies for geologic hazards that apply to the project site.

Project Impacts

Using the information from the Evaluation of Screening Criteria and the description of the proposed project, project site, and surrounding area, determine the geologic hazards that the project would cause or accelerate. Substantial damage to structures or infrastructure and exposure of people to substantial risk of injury is related to the probable frequency of potential geologic hazards (i.e., likely number of events per year or decade) and the probable severity of the consequences to people, property, or infrastructure that may result (i.e., injuries to people and the valuation of property damage). Consider that the geologically active nature of the region means that most projects will be exposed to geologic hazards, such as seismic activity. Significant impacts, as indicated by the significance threshold, exceed the typical risk of hazard for the region. Consider the type of uses that would be included in the project, the characteristics of the occupants of the project, and the change in risk of hazard or damage that would result from the project.

Cumulative Impacts

Review the description of the related projects. Identify those with elements, activities, or operations which would cause or accelerate geologic hazards that would extend off-site. Consider the impact from the combined effect of the related and proposed projects, in the same manner as described above for Project Impacts.

Sample Mitigation Measures

Potential mitigation measures include the following:

- Use interim precautionary steps during construction; and
- Use design and structural features that exceed the requirements of the Los Angeles Building Code and Planning and Zoning Code. (Chapter 1 of the Municipal Code).

3. DATA, RESOURCES, AND REFERENCES

Department of Building and Safety, 201 North Figueroa Street, 4th Floor, Construction Services Center, Los Angeles, California 90012; Telephone: (213) 833-8389.

Bureau of Engineering, Geotechnical Engineering Group, 650 S. Spring St., Suite 495, Los Angeles, CA 90014. (213) 847-4010.

Bureau of Engineering, Structural Engineering Group, 650 S. Spring St., Suite 400, Los Angeles, CA. 90014. (213) 847-8774.

City Planning Department, Environmental and Public Facilities Maps (1996):

- Alquist-Priolo Special Study Zones and Fault Rupture Areas illustrates the approximate locations of Alquist-Priolo Special Study Zones and fault rupture areas;
- Inundation and Tsunami Hazard Areas;
- Areas Susceptible to Liquefaction;
- Landslide Inventory and Hillside Areas illustrates the approximate locations of hillside areas, areas with known or probable bedrock landslides, and areas of surficial landslides larger than five acres;
- Areas Containing Significant Mineral Deposits identifies areas within a Mineral Resource Zone (MRZ) 2. Projects within this designation may experience subsidence/settlement where mineral extraction has occurred or is planned; and
- Oil Field and Oil Drilling Areas show areas known to have supported at least six months of oil production, indicating an increased risk for subsidence.
- ZIMAS (Zone Information & Map Access System) http://zimas.lacity.org
- Navigate LA http://navigatela.lacity.org/
- Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps.

Planning and Zoning code is available from the City Planning Department's Central Publications Unit at 200 N. Spring St., 5th Floor, Los Angeles, CA., 90012; Online at: http://amlegal.com/los_angeles_ca/.

Selected Legislation

Federal

Flood Insurance Rate Maps (FIRMs) (10 CFR Section 1022.11, 43 CFR Section 64.3)

FIRMs are prepared by the Federal Insurance Administration of the Department of Housing and Urban Development (HUD) after a risk study for a community has been completed and the risk premium rates have been established. The maps indicate the risk premium zones applicable in the community and when those rates are effective. They are used in making flood plain determinations and to determine if a proposed action is located in the base or critical action flood plain, as appropriate.

State

Alquist-Priolo Earthquake Fault Zoning Act (PRC Section 2621.5)

Provides policies and criteria to assist cities, counties, and state agencies in the development of structures for human occupancy across the trace of active faults. Intended to provide the citizens of the state with increased safety and to minimize the loss of life during and immediately following earthquakes by facilitating seismic retrofitting to strengthen buildings, including historical buildings, against ground shaking.