



CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

MITIGATED NEGATIVE DECLARATION

Rendon Hotel Project

Case Number: ENV-2017-4735-MND
CPC-2017-4734-GPA-ZC-HD-CUB-CUX-ZV-ZAA-SPR

Project Location: 2053 - 2059 East 7th Street, Los Angeles, CA 90021

Community Plan Area: Central City North

Council District: 14

Project Description: The Rendon, LLC (the “Applicant”) proposes a one-story addition to an existing three-story hotel and the construction, use, and maintenance of an attached 15-story hotel building with 103 guest rooms and approximately 15,907 square feet of commercial space comprised of art gallery, café, restaurant, and bar uses. (“Proposed Project”). The project site is comprised of two contiguous parcels in the City of Los Angeles, on the northwest corner of East 7th Street and Santa Fe Avenue. The existing three-story, 14,910 square-foot hotel building on the Project Site would remain and would undergo structural alterations, tenant improvements, and a one-story addition, resulting in a four-story building. In total, the Proposed Project would include 67,615 square feet of floor area, resulting in a floor area ratio of 6:1. The 15-story hotel addition would reach a maximum height of 172'-5" above grade. One subterranean level would be provided to include mechanical equipment, storage, bicycle parking, and service areas. Parking would be provided off-site through a private agreement. A valet drop-off area would be located along Santa Fe Avenue, adjacent to the Project Site. Additionally, the Proposed Project would be consistent with the applicable requirements of the LAMC for bicycle parking spaces.

The Applicant is requesting the following discretionary approvals: (1) Pursuant to LAMC Section 11.5.6, a General Plan Amendment to the Central City North Community Plan to change the Community Plan land use designation from Heavy Industrial to Regional Center Commercial; (2) Pursuant to LAMC Section 12.32.F and 12.32.Q, a Zone Change and Height District change from M3-1-RIO to C2-2-RIO, which would allow the proposed FAR of up to 6:1; (3) Pursuant to LAMC Section 12.24.W.1, a Conditional Use Permit to allow the sale of a full-line of alcoholic beverages for consumption on the premises; (4) Pursuant to LAMC Section 12.24.W.18, a Conditional Use Permit to permit public dancing and live entertainment in conjunction with the operation of restaurants and/or bar uses in the C2 zone; (5) Pursuant to LAMC Section 12.28.A, a Zoning Administrator’s Adjustment to maintain an existing non-conforming 4-foot western side yard setback for the 2nd and 3rd floors of the existing building; to allow a 3-foot rear yard setback, in lieu of a 20-foot rear yard setback, for the hotel addition; and allow an 11-foot western side yard setback, in lieu of a 16-foot side yard setback for the hotel addition on the 5th through 15th floors; (6) Pursuant to LAMC Section 12.27, a Variance from LAMC Section 12.21.A.4 to for zero on-site parking spaces; and (7) Pursuant to LAMC Section 16.50, Site Plan Review for a proposed hotel containing more than 50 guest rooms. In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: demolition, grading, foundation, building and tenant improvements.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Parker Environmental
Consultants, LLC

APPLICANT:
The Rendon, LLC

February 2021

INITIAL STUDY CHECKLIST MITIGATED NEGATIVE DECLARATION

Table of Contents

| | <u>Page</u> |
|---|-------------|
| 1. Introduction | 5 |
| 2. Executive Summary | 8 |
| 3. Project Description | 12 |
| A. Project Summary | 12 |
| B. Environmental Setting | 13 |
| C. Description of Project | 22 |
| D. Requested Permits and Approvals | 50 |
| 4. Environmental Checklist | 51 |
| I. Aesthetics | 51 |
| II. Agriculture and Forestry Resources | 57 |
| III. Air Quality | 60 |
| IV. Biological Resources | 71 |
| V. Cultural Resources | 74 |
| VI. Energy | 81 |
| VII. Geology and Soils | 90 |
| VIII. Greenhouse Gas Emissions | 97 |
| IX. Hazards and Hazardous Materials | 110 |
| X. Hydrology and Water Quality | 115 |
| XI. Land Use and Planning | 125 |
| XII. Mineral Resources | 134 |
| XIII. Noise | 136 |
| XIV. Population and Housing | 152 |
| XV. Public Services | 156 |
| XVI. Recreation | 166 |
| XVII. Transportation | 168 |
| XVIII. Tribal Cultural Resources | 179 |
| XIX. Utilities and Service Systems | 182 |
| XX. Wildfire | 196 |
| XXI. Mandatory Findings of Significance | 197 |
| 5. Preparers and Persons Consulted | 199 |
| 6. References, Acronyms, and Abbreviations | 201 |

List of Figures

| | |
|--|----|
| Figure 3.1: Project Location Map | 14 |
| Figure 3.2: Zoning and General Plan Land Use Designation Map | 16 |
| Figure 3.3: Aerial Photograph of the Project Site | 19 |

| | |
|---|-----|
| Figure 3.4: Photographs of the Project Site, Views 1-6..... | 20 |
| Figure 3.5: Photographs of Surrounding Land Uses, Views 7-12 | 21 |
| Figure 3.6: Plot Plan | 23 |
| Figure 3.7: Basement Floor Plan..... | 24 |
| Figure 3.8: First Floor Plan | 25 |
| Figure 3.9: Second Floor Plan..... | 26 |
| Figure 3.10: Third Floor Plan..... | 27 |
| Figure 3.11: Fourth Floor Plan..... | 28 |
| Figure 3.12: Typical Guest Room Floor Plan | 29 |
| Figure 3.13: Thirteenth Floor Plan..... | 30 |
| Figure 3.14: Fifteenth Floor Plan | 31 |
| Figure 3.15: North and South Elevations..... | 33 |
| Figure 3.16: West Elevations..... | 34 |
| Figure 3.17: East Elevations..... | 35 |
| Figure 3.18: Building Sections..... | 36 |
| Figure 3.19: Architectural Renderings | 37 |
| Figure 3.20: Level 1 and 2 Landscape Plans | 39 |
| Figure 3.21: Level 4, 13, and 15 Landscape Plans | 40 |
| Figure 3.22: Valet Drop-Off Options | 41 |
| Figure 3.23: Location of Related Projects | 49 |
| Figure 4.1: Air Quality Sensitive Receptors..... | 67 |
| Figure 4.2: Noise Monitoring and Sensitive Receptor Location Map..... | 140 |

List of Tables

| | |
|--|-----|
| Table 3.1: Summary of the Project Site..... | 13 |
| Table 3.2: Proposed Development Program | 22 |
| Table 3.3: Summary of Required and Proposed Vehicle Parking Spaces | 42 |
| Table 3.4: Summary of Required and Proposed Bicycle Parking Spaces..... | 42 |
| Table 3.5: Related Projects List..... | 47 |
| Table 4.1: Estimated Peak Daily Construction Emissions..... | 64 |
| Table 4.2: Proposed Project Estimated Daily Operational Emissions | 65 |
| Table 4.3: Localized On-Site Peak Daily Construction Emissions | 68 |
| Table 4.4: Construction Energy Use..... | 82 |
| Table 4.5: Estimated Electricity Consumption by the Proposed Project..... | 83 |
| Table 4.6: Estimated Natural Gas Consumption by the Proposed Project..... | 84 |
| Table 4.7: Estimated Transportation Energy Consumption by the Proposed Project | 86 |
| Table 4.8: Proposed Project Construction-Related Greenhouse Gas Emissions | 104 |
| Table 4.9: Proposed Project Operational Greenhouse Gas Emissions..... | 105 |
| Table 4.10: Existing Ambient Daytime Noise Levels | 141 |
| Table 4.11: Community Noise Exposure Levels (CNEL)..... | 142 |
| Table 4.12: Typical Outdoor Construction Noise Levels | 143 |
| Table 4.13: Estimated Exterior Construction Noise at Nearest Sensitive Receptors Without Mitigation | 145 |
| Table 4.14: Estimated Exterior Construction Noise at Nearest Sensitive Receptors | |

| | |
|---|-----|
| With Mitigation | 146 |
| Table 4.15: Vibration Source Levels for Construction Equipment | 149 |
| Table 4.16: Vibration Damage Potential Threshold Criteria | 150 |
| Table 4.17: SCAG Population and Housing Projections for the City of Los Angeles, Los Angeles County, and the SCAG Region | 154 |
| Table 4.18: Projected Employment Growth | 155 |
| Table 4.19: Central Area Crime Statistics | 160 |
| Table 4.20: Resident Schools Serving the Project Site | 162 |
| Table 4.21: Proposed Project Estimated Student Generation | 162 |
| Table 4.22: Questions to Determine Project Applicability to Plans, Policies, and Programs | 169 |
| Table 4.23: LADOT Thresholds for Significant VMT Impacts | 175 |
| Table 4.24: VMT Analysis of Proposed Project With and Without Mitigation | 177 |
| Table 4.25: Proposed Project Estimated Water Demand | 184 |
| Table 4.26: Proposed Project Estimated Wastewater Generation | 186 |
| Table 4.27: Estimated Construction and Demolition Debris | 193 |
| Table 4.28: Expected Operational Solid Waste Generation | 193 |

APPENDICES

APPENDIX A: AIR QUALITY MODELING WORKSHEETS

APPENDIX B: HISTORIC RESOURCES REPORT

GPA Consulting, Historical Resource Technical Report, Rendon Hotel, Los Angeles, California, dated March 2019.

APPENDIX C: ENERGY CONSUMPTION WORKSHEETS

APPENDIX D: GEOTECHNICAL INVESTIGATION

D.1: Geocon West, Inc., Geotechnical Investigation, Proposed Hotel Development, 2053 East 7th Street, Los Angeles, California, August 1, 2018.

D.2: Department of Building and Safety, Soils Report Approval Letter, 2053 E. 7th Street, August 16, 2018.

APPENDIX E: GREENHOUSE GAS EMISSIONS CALCULATIONS WORKSHEETS

APPENDIX F: NOISE MONITORING DATA AND CALCULATIONS WORKSHEETS

APPENDIX G: TRANSPORTATION ASSESSMENT

G.1: Crain & Associates, Transportation Assessment for the Proposed Rendon Hotel Project, City of Los Angeles, April 7, 2020.

G.2: City of Los Angeles Department of Transportation, Transportation Assessment for the Proposed Hotel Development Project Located at 2053-2059 East 7th Street (DOT Case No. CEN19-48908), July 9, 2020.

APPENDIX H: UTILITIES AND SERVICE PROVIDER RESPONSE LETTERS

H.1: Bureau of Sanitation, Sewer Capacity Availability Request (SCAR), 2053 E. 7th Street, April 2, 2019.

H.2: Los Angeles Department of Water and Power, Water and Electricity Connection Services Request, Rendon Hotel Project, May 21, 2019.

H.3: Los Angeles Police Department, Correspondence Letter, Rendon Hotel Project, June 11, 2019.

APPENDIX I: CULTURAL RECORDS SEARCH

Natural History Museum of Los Angeles County, Paleontological Resources for the Proposed Rendon Hotel Project #ENV-2017-4735-EAF, in the City of Los Angeles, Los Angeles County, Project Area, May 8, 2019.

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION (IS/MND)

Section 1. Introduction

Project Information

Project Title: Rendon Hotel Project
Project Location: 2053 – 2059 East 7th Street
Los Angeles, CA 90021

Project Applicant: The Rendon, LLC
1880 Century Park East #200
Los Angeles, CA 90067

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

An application for the proposed Rendon Hotel Project (“Proposed 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 Proposed Project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study/Mitigated Negative Declaration (IS/MND) 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 IS/MND, the City has concluded that the Project will not result in significant impacts on the environment with the incorporation of mitigation measures identified herein. This Initial Study and Mitigated Negative Declaration are intended as informational documents, and are ultimately required to be adopted by the decision maker 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 concludes that the Proposed Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

1.2 Organization of the Initial Study

This Initial Study (IS) is organized into six sections as follows:

Section 1. Introduction: This Section provides introductory information such as the Proposed Project title, the Project Applicant, and the lead agency for the Proposed Project.

Section 2. Executive Summary: This Section provides Project information, identifies key areas of environmental concern, and includes a determination whether the Proposed Project may have a significant effect on the environment.

Section 3. Project Description: This Section provides a description of the environmental setting and the Proposed Project, including project characteristics, related project information and a list of requested discretionary actions.

Section 4. Evaluation of Environmental Impacts: This Section contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Proposed Project.

Section 5. Preparers and Persons Consulted: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

Section 6. References, Acronyms and Abbreviations: This Section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

1.3 CEQA Process

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Proposed 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 Proposed 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 an Initial Study to identify the preliminary environmental impacts of the project. The Initial Study for the Project determined that the proposed Project would not have significant environmental impacts with the incorporation of mitigation measures identified herein.

If this IS/MND and the Proposed Project are approved by the City, then within five days of the action, the City will file 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

Section 2. Executive Summary

Project Title: Rendon Hotel Project

Environmental Case Number: ENV-2017-4735-MND

Related Cases: CPC-2017-4734-GPA-ZC-HD-CUB-CUX-ZV-ZAA-SPR

Project Location: 2053 – 2059 East 7th Street
Los Angeles, CA 90021

Community Plan Area: Central City North

Council District: 14

Lead City Agency: City of Los Angeles
Department of City Planning

Staff Contact Name and Address: Oliver Netburn
200 North Main Street, Room 763
Los Angeles CA 90012

Phone Number: (213) 978-1382

Applicant Name and Address: The Rendon, LLC
1880 Century Park East #200
Los Angeles, CA 90067

Phone Number: (213) 620-1904

General Plan Designation: Heavy Industrial

Zoning: M3-1-RIO

PROJECT DESCRIPTION:

The Rendon, LLC (the “Applicant”) proposes a one-story addition to an existing three-story hotel building and the new construction, use, and maintenance of an attached 15-story hotel building with 103 guest rooms with approximately 15,907 square feet of commercial space comprised of art gallery, café, restaurant and bar uses (“Proposed Project”). The project site is comprised of two contiguous parcels in the City of Los Angeles, on the northwest corner of East 7th Street and Santa Fe Avenue, as further described in Section 3, Project Description, below. The existing three-story, 14,910 square-foot hotel building on the Project Site would remain and would undergo structural alterations, tenant improvements, and a one-story addition, resulting in a four-story building. With completion of the Proposed Project, the total floor area on the Project Site equates to 67,615 square feet, resulting in a floor area ratio of 6:1. The 15-story hotel addition would reach a maximum height of 172’-5” above grade. One subterranean level would be provided to include mechanical equipment, storage, bicycle parking, and service areas. Parking would be provided off-site through a private agreement. A valet drop-off area would be located along Santa Fe Avenue, adjacent to the Project Site. Additionally, the Proposed Project would be consistent with the applicable requirements of the LAMC for bicycle parking spaces.

The Applicant is requesting the following discretionary approvals: (1) Pursuant to LAMC Section 11.5.6, a General Plan Amendment to the Central City North Community Plan to change the Community Plan land use designation from Heavy Industrial to Regional Center Commercial; (2) Pursuant to LAMC Section 12.32.F and 12.32.Q, a Zone Change and Height District change from M3-1-RIO to C2-2-RIO, which would allow the proposed FAR of up to 6:1; (3) Pursuant to LAMC Section 12.24.W.1, a Conditional Use Permit to allow the sale of a full-line of alcoholic beverages for consumption on the premises; (4) Pursuant to LAMC Section 12.24.W.18, a Conditional Use Permit to permit public dancing and live entertainment in conjunction with the operation of restaurants and/or bar uses in the C2 zone; (5) Pursuant to LAMC Section 12.28.A, a Zoning Administrator's Adjustment to maintain an existing non-conforming 4'0" western side yard setback for the 2nd and 3rd floors of the existing building; to allow a 3'0" rear yard setback, in lieu of a 20'0" rear yard setback, for the hotel addition; and allow a 11'0" western side yard setback, in lieu of a 16'0" side yard setback for the hotel addition on the 5th through 15th floors; (6) Pursuant to LAMC Section 12.27, a Variance from LAMC Section 12.21.A.4 to for zero on-site parking spaces; and (7) Pursuant to LAMC Section 16.50, Site Plan Review for a proposed hotel containing more than 50 guest rooms. In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: demolition, grading, foundation, building and tenant improvements. (For additional detail, see "Section 3. Project Description").

ENVIRONMENTAL SETTING:

The project site includes two parcels with the following Assessor Parcel Number (APN No. 5164-019-018) that encompasses 11,287 square feet (0.26 acres) of lot area ("Project Site"). The Project Site is currently occupied by a vacant three-story hotel building and surface parking lot. The surrounding properties are developed with offices, commercial, industrial, warehousing, multi-family residential buildings, and proposed mixed-use residential developments (under construction).

(For additional detail, see "Section 3. Project Description").

Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.): N/A

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.?

Yes, see Initial Study Checklist Question XVIII, Tribal Cultural Resources in Section 4 of this IS/MND.

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 “Less Than Significant Impact With Mitigation” as indicated by the checklist on the following pages.

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

DETERMINATION (to be completed by 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.

Oliver Netburn
PRINTED NAME



SIGNATURE

City Planner
TITLE

February 11, 2021
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/ MITIGATED NEGATIVE DECLARATION

Section 3. Project Description

A. Project Summary

The Rendon, LLC (the “Applicant”) proposes a one-story addition to an existing three-story 14,910 square foot hotel and the construction, use, and maintenance of an attached 15-story hotel building with 103 guest rooms and approximately 15,907 square feet of commercial space comprised of art gallery, café, restaurant, and bar uses (“Proposed Project”). The project site is comprised of two contiguous parcels in the City of Los Angeles, on the northwest corner of East 7th Street and Santa Fe Avenue, as further described in Section 3, Project Description, below. The existing three-story, 14,910 square-foot hotel building on the Project Site would remain and would undergo structural alterations, tenant improvements, and a one-story addition, resulting in a four-story building. With completion of the Proposed Project, the total floor area on the Project Site equates to 67,615 square feet, resulting in a floor area ratio of 6:1. The 15-story hotel addition would reach a maximum height of 172’-5” above grade. One subterranean level would be provided to include mechanical equipment, storage, bicycle parking, and service areas. Parking would be provided off-site through a private agreement. A valet drop-off area would be located along Santa Fe Avenue, adjacent to the Project Site. Additionally, the Proposed Project would be consistent with the applicable requirements of the LAMC for bicycle parking spaces.

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In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: demolition, grading, foundation, building, and tenant improvements.

B. Environmental Setting

1. Project Location

The Project Site is located in the Central City North Community Plan area within the City of Los Angeles. The Project Site's location within the City of Los Angeles and the greater Los Angeles region is depicted in Figure 3.1, Project Location Map. The Project Site encompasses two parcels and includes approximately 11,287 square feet of gross lot area (0.26 acres) and approximately 8,614 square feet of lot area after dedications. The Project Site's property addresses, Assessor's Parcel Numbers (APN), land use, and lot area are summarized in Table 3.1, Summary of the Project Site, below.

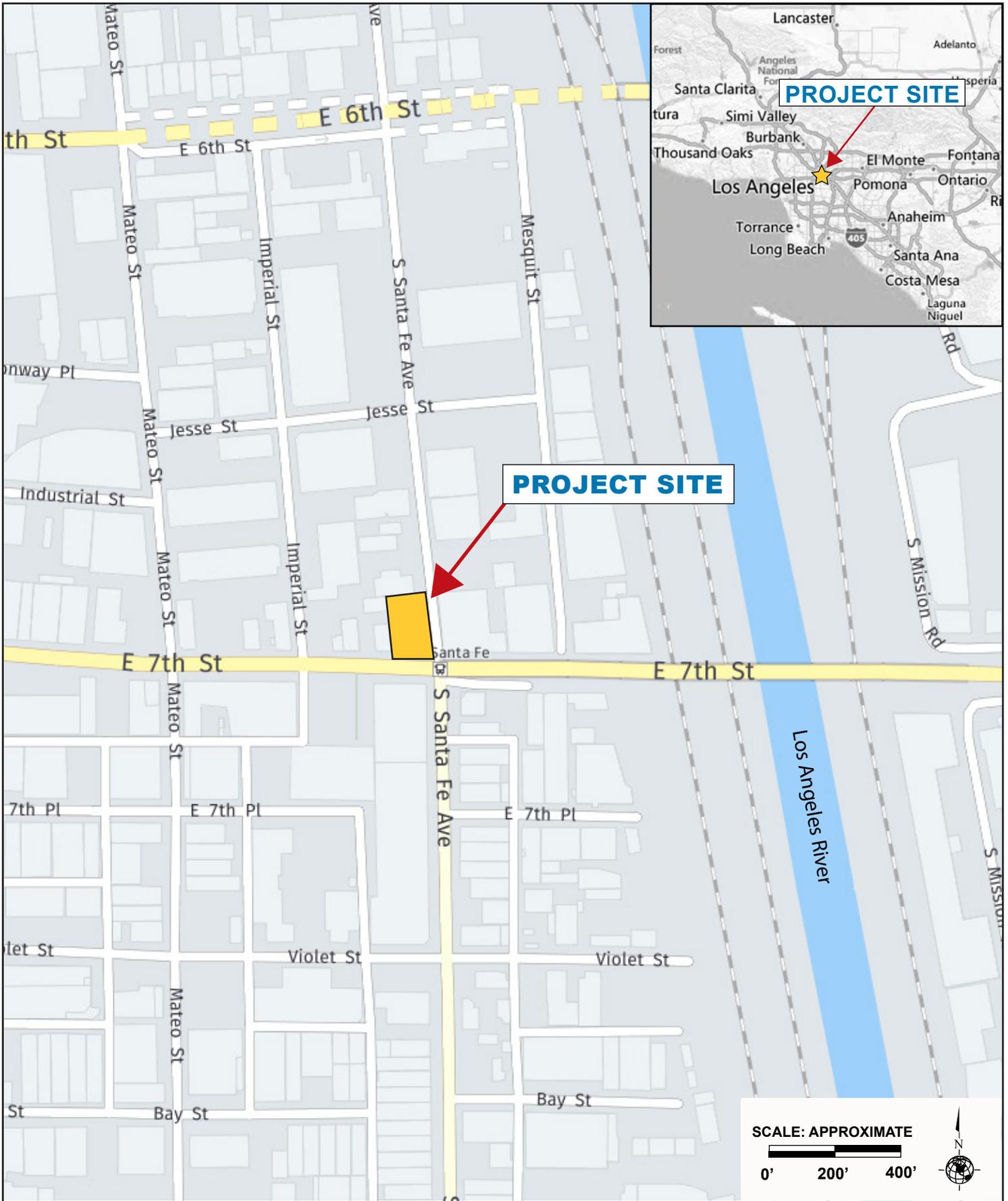
**Table 3.1
Summary of the Project Site**

| Address | APN | Existing Land Use | Lot Area (square feet) |
|---|--------------|-------------------|------------------------|
| 2053, 2055, and 2055 ½ East 7 th Street | 5164-019-018 | Hotel | 11,287 sf |
| 2057, 2059 East 7 th Street | | | |
| Sources: City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: http://zimas.lacity.org/ , accessed March 2019. | | | |

The Project Site is generally bound by East 7th Street to the south; Santa Fe Avenue to the east; and a mixed-use residential and commercial development to the west and north of the Project Site.

Primary vehicular access to the Project Site is provided by the Hollywood Freeway (US-101) approximately 0.5 mile to the east, the Santa Monica (I-10) Freeway approximately 0.5 mile to the south, and the Harbor/Pasadena Freeway (I-110/SR-110) approximately two miles to the west.

Local street access is provided by the grid roadway system surrounding the Project Site. East 7th Street, which borders the Project Site to the south, is a two-way street providing two travel lanes in each direction. East 7th Street is classified as an Avenue II roadway in the City's Mobility Plan. Santa Fe Avenue, which borders the Project Site to the east, is a two-way street providing one travel lane in each direction. Santa Fe Avenue is designated as an Avenue II roadway in the City's Mobility Plan. Street parking is provided along East 7th Street and Santa Fe Avenue with restrictions. Other major arterial roadways providing access to the Project Site is East 6th Street, which is located approximately ¼-mile north of the Project Site, and Alameda Street, located approximately ½-mile west of the Project Site. East 6th Street is classified as an Avenue II roadway, and Alameda Street is classified as an Avenue I roadway in the City's Mobility Plan.



Source: Yahoo Maps, 2019.

The bus service in the Project vicinity is operated primarily by the Los Angeles County Metropolitan Transportation Authority (“Metro”). Specifically, a total of four bus lines serve the nearby Project Site area, including Metro Local lines 18, 60, 62; and Metro Rapid Line 720. These bus lines have stops located within 0.3 mile walking distance of the Project Site along 6th Street, 7th Street, Santa Fe Avenue, and other nearby streets with some lines (Metro Local lines 18, 60, and 62) with headways of 15 minutes or less during peak hour. The Project Site is located east of Downtown Los Angeles. Therefore, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

2. Existing Conditions

2.1 Zoning and Land Use Designations

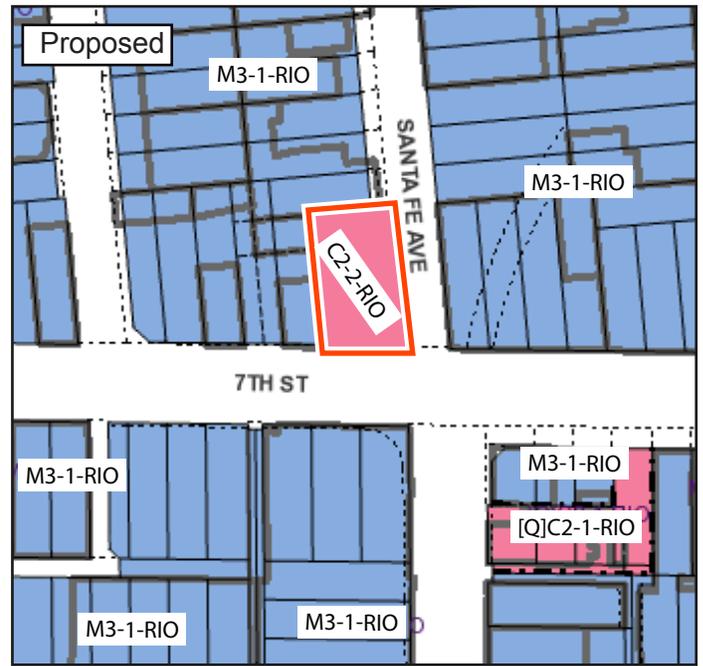
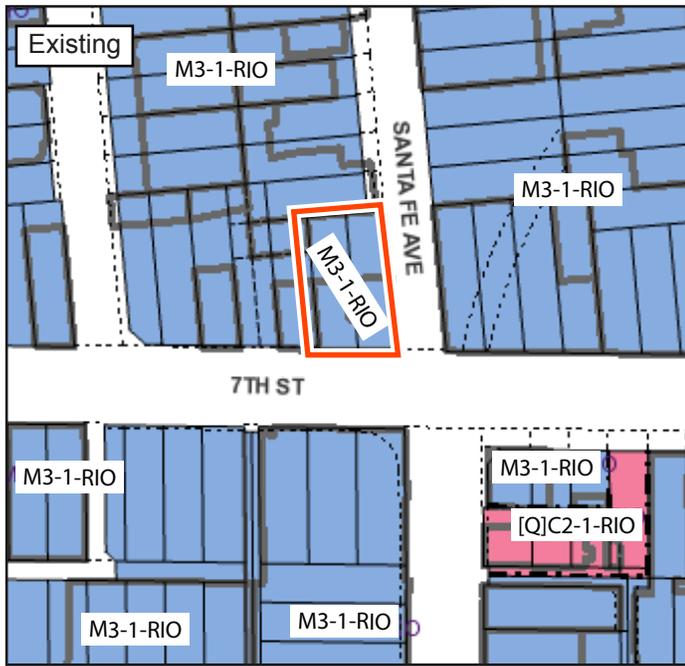
Figure 3.2, Zoning and General Plan Designations Figure 3.2, Zoning and General Plan Designations, shows the existing and proposed zonings and land use designations on the Project Site and in the surrounding area. The zoning for the Project Site is M3-1-RIO (Heavy Industrial Zone) with a General Plan land use designation of Heavy Industrial. The zone corresponding to the Heavy Industrial designation is the M3 zone. The Project Site is located in Height District No. 1, which does not specify a height restriction for a M3 Zone, but limits development to a FAR of 1.5:1. The “RIO” designation identifies the Project Site in a River Improvement Overlay District (ZI-2358). The Project Site is also located within the Central Industrial Redevelopment Project area (ZI-2488), East Los Angeles State Enterprise Zone (ZI-2129) and under the Residential Hotel Unit Conversion Demolition Ordinance (ZI-2353).

2.1.1 Central City North Community Plan

The Project Site is located within the Central City North Community Plan area (Central City North CPA). The Community Plan area contains 2005 acres, which is less than one percent of the land within the City of Los Angeles. The plan area is adjacent to downtown Los Angeles and bound by the Los Angeles River to the east, the City of Vernon to the south, Alameda Street, Cesar Chavez Avenue, Sunset Boulevard, and Marview Avenue to the west, and Stadium Way, Lilac Terrace, and North Broadway to the north. The Central City North CPA is largely characterized by industrial uses. Commercial and residential uses comprise the northern portion of the CPA. Seven neighborhoods comprise the Central City North CPA, which include Figueroa Terrace, Alpine Hill, Chinatown, North Industrial, Government Support, Artists-in-Residence District, and the South Industrial.

Within the Central City North CPA, the Project Site is located within the South Industrial neighborhood. Industrial uses, largely characterized by large warehouses and truck and railroad yards, dominate the South Industrial area. Additionally, the northern end of the Alameda Corridor terminates in this neighborhood. The Alameda Corridor is an extensive 20-mile freight rail corridor that separates freight trains from street traffic and passenger trains, and runs along Alameda Street and the Southern Pacific right-of-way extending from the ports of Long Beach and Los Angeles to Downtown and East Los Angeles.

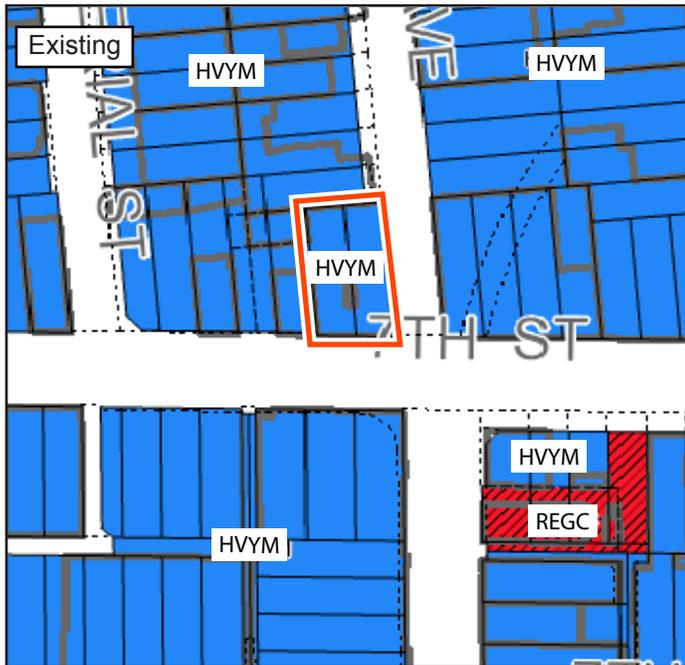
Zoning Designations



LEGEND Project Site

M3 C2

General Plan Land Use Designations



LEGEND Project Site

Heavy Manufacturing Regional Center Commercial

source: ZIMAS, City of Los Angeles, Department of City Planning, 2019.

The last update of the Central City North Community Plan was the AB283 Plan Consistency program completed in 1988.

The Community Plan was developed in the context of promoting a vision of the Central City North area as a community that:

- Preserves and enhances the positive characteristics of existing residential neighborhoods while providing a variety of housing opportunities with compatible new housing.
- Improves the function, design, and economic vitality of the commercial corridors.
- Preserves and enhances the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance.
- Maximizes the development opportunities of future transit systems while minimizing any adverse impacts.
- Plans the remaining commercial and industrial development opportunity sites for needed job producing uses that will improve the economic and physical condition of the Central City North area.

2.1.2 Central Industrial Redevelopment Project Plan

Development on the Project Site is further defined by the Redevelopment Plan for the Central Industrial Redevelopment Project (“Redevelopment Plan”). Development in the Redevelopment Project Area is governed by the Redevelopment Plan that was adopted on November 15, 2002 by the CRA/LA and remains effective until November 15, 2032. Pursuant to Ordinance 183,325 (effective 11/11/19), the authority or responsibility to perform actions and related land use functions regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section 11.5.14 and applicable provisions of the Code was transferred to the Department of City Planning. The Redevelopment Plan identifies overall objectives and development standards to guide the development, redevelopment, and rehabilitation of properties within the Central Industrial area. Goals within the Redevelopment Plan that are applicable to the Proposed Project include providing: a high quality of life for those who live and work in the area; elimination of conditions of blight and deterioration within the Redevelopment Plan area, rehabilitation of deteriorated structures, redevelopment of underutilized and vacant parcels; maintenance of a thriving commercial environment to serve businesses, employees, residents, and visitors; adequate, convenient and safe parking facilities, in on- or off-street locations; accessible businesses,, residences, and other land uses via public and semi-public transportation that is affordable to employees, residents, and visitors to promote jobs, businesses, and housing opportunities; structures that meet all code requirements of the City of Los Angeles, guided by urban design, land use and development standards; and sustainable development that utilizes precepts of energy efficiency, renewable energy, water resource conservation and reuse, and waste/urban runoff management, among other techniques of sustainability.

2.2 Existing Site Conditions

Figure 3.3, Aerial Photograph of the Project Site and Surrounding Land Uses, shows an aerial view of the Project Site and identifies the photograph locations for the Project Site and surrounding land use photographs shown in Figure 3.4, Photographs of the Project Site.

The Project Site is currently occupied by a vacant 14,910 square-foot three-story hotel building. There is one vehicle driveway located along the west side of Santa Fe Avenue that provides access to the Project Site. The Project Site does not contain any native vegetation or locally protected tree species. There are no street trees on the public right-of-way adjacent to the Project Site.

3. Surrounding Land Uses

As shown in Figure 3.2, the Project Site is in an industrially zoned “M3” area, and properties immediately bordering the Project Site are zoned M3-1-RIO with a Heavy Industrial land use designation. However, the properties surrounding the Project Site include a mix of commercial uses (including restaurants, retail, and cafes), mixed-use residential, multi-family residential, office, manufacturing, and industrial uses. These land uses range in height from one- to five-stories above grade. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 3.5. Figure 3.3 shows an aerial photograph and list of the uses surrounding the Project Site. Below is description of the existing conditions in the surrounding area.

North: The Project Site is immediately bordered by a mixed-use residential and commercial development to the north. This property is zoned M3-1-RIO with a Heavy Industrial General Plan land use designation. Refer to Figure 3.5, View 7.

West: The Project Site is immediately bordered by a mixed-use residential and commercial development to the west. This property is zoned M3-1-RIO with a Heavy Industrial land use designation. Refer to Figure 3.5, View 8.

East: Santa Fe Avenue immediately borders the Project Site to the east. A three-story residential building with live-work units and associated surface parking lot is located east of the Project Site, across Santa Fe Avenue. This property is zoned M3-1-RIO with a Heavy Industrial land use designation. Refer to Figure 3.5, Views 9 and 10. The Union Pacific Railroad tracks are located approximately 0.14 mile east of the Project Site. Adjacent to the Union Pacific Railroad tracks is the Los Angeles River, which is located approximately 0.15 mile east of the Project Site.

South: East 7th Street immediately borders the Project Site to the south. Directly south of the Project Site, across East 7th Street, is the five-story warehouse building which has been converted to office space located at 777 South Santa Fe Avenue. This property is zoned M3-1-RIO with a Heavy Industrial land use designation. Refer to Figure 3.5, Views 11 and 12.





View 1: On the south side of E. 7th Street looking north at the Project Site.



View 2: On the south side of E. 7th Street looking north at the Project Site.



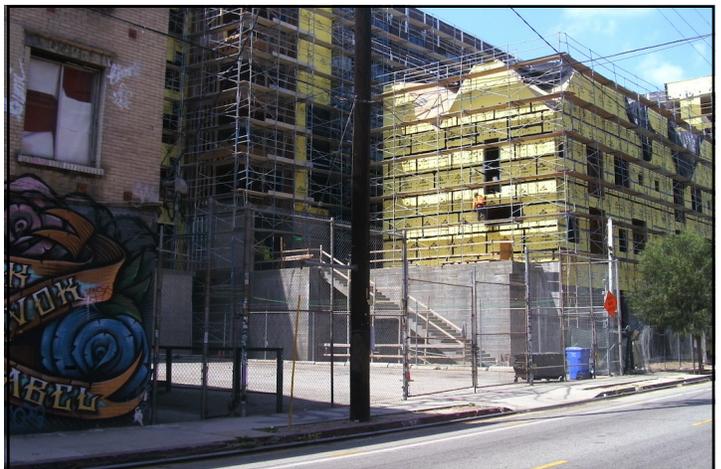
View 3: On the northeast corner of E. 7th Street and S. Santa Fe Avenue looking west at the Project Site.



View 4: On the east side of S. Santa Fe Avenue looking northwest at the Project Site.



View 5: On the east side of S. Santa Fe Avenue looking west at the Project Site.



View 6: On the east side of S. Santa Fe Avenue looking northwest at the Project Site.

Source: Parker Environmental Consultants, April 2, 2019.



View 7: On the east side of S. Santa Fe Avenue looking northwest at the property north of the Project Site.



View 8: On the south side of E. 7th Street looking northeast at the property west of the Project Site.



View 9: On the southwest corner of E. 7th Street and S. Santa Fe Avenue looking north at the properties east of the Project Site.



View 10: On the west side of S. Santa Fe Avenue looking northeast at the properties southeast of the Project Site.



View 11: On the east side of S. Santa Fe Avenue looking northeast at the property south of the Project Site.



View 12: On the north side of E. 7th Street looking southwest at the property southwest of the Project Site.

Source: Parker Environmental Consultants, April 2, 2019.



Figure 3.5
Photographs of Surrounding Uses
Views 7-12

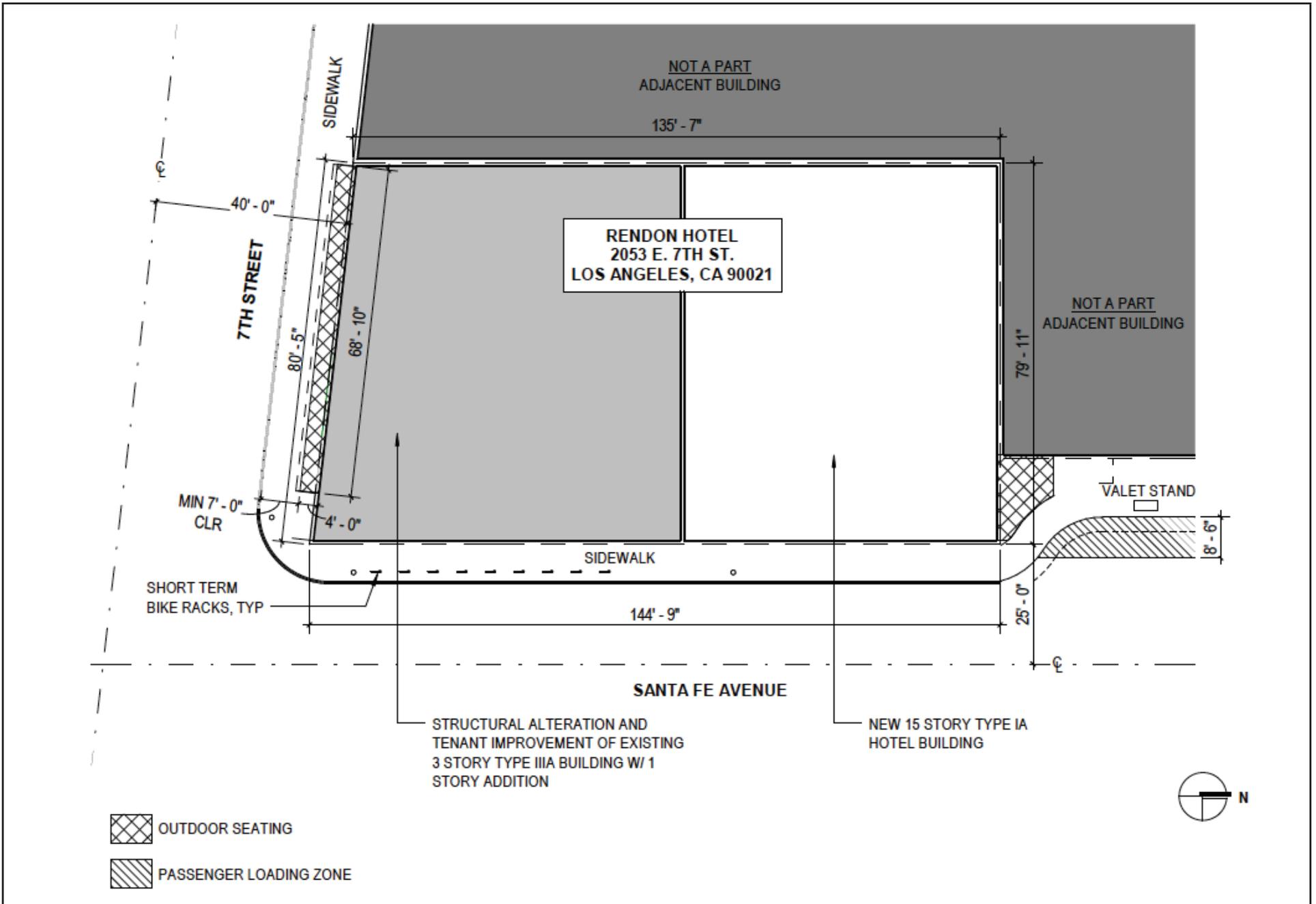
C. Description of Project

1. Project Overview

The Proposed Project includes the one-story addition to an existing vacant three-story 14,910 square-foot building and the construction, use, and maintenance of an attached 15-story hotel building with 103 guest rooms and approximately 15,907 square feet of commercial space comprised of art gallery, café, restaurant, and bar uses. The Proposed Project would result in a total of approximately 67,615 square feet of developed floor area. The existing three-story building would remain and be renovated with a one-story addition, resulting in a four-story building. The ground floor of the existing building would be reconfigured into a hotel café and art gallery. The existing ground floor bar would remain as well as the existing circulation stair. The second and third floors of the existing building would be reconfigured into hotel guest rooms, and the 4th floor roof would be converted into occupiable space for an enclosed hotel bar and a landscaped roof terrace with uncovered seating. The ground floor of the new 15-story addition would be used as a hotel lobby and check-in with a covered gallery entrance. Hotel rooms would be located on the 2nd through 12th floors, and a restaurant would be located on the 13th and 14th floors. The 15th level rooftop would include a bar, lounge, roof garden, and spa deck. The subterranean floor would be used for back of house and mechanical space. No parking would be provided on-site. The Proposed Project includes a total floor area of 67,615 square feet and a floor area ratio (FAR) of 6:1, which consists of the existing 14,910 square-foot building and an additional 52,705 square feet of new floor area. The Proposed Project would reach a maximum height of 172 feet and five inches above grade. A summary of the Proposed Project is provided in Table 3.2, Proposed Development Program, below. The plan layout of the Proposed Project is depicted in Figure 3.6, Plot Plan. The floor plans are illustrated in Figures 3.7 through 3.14.

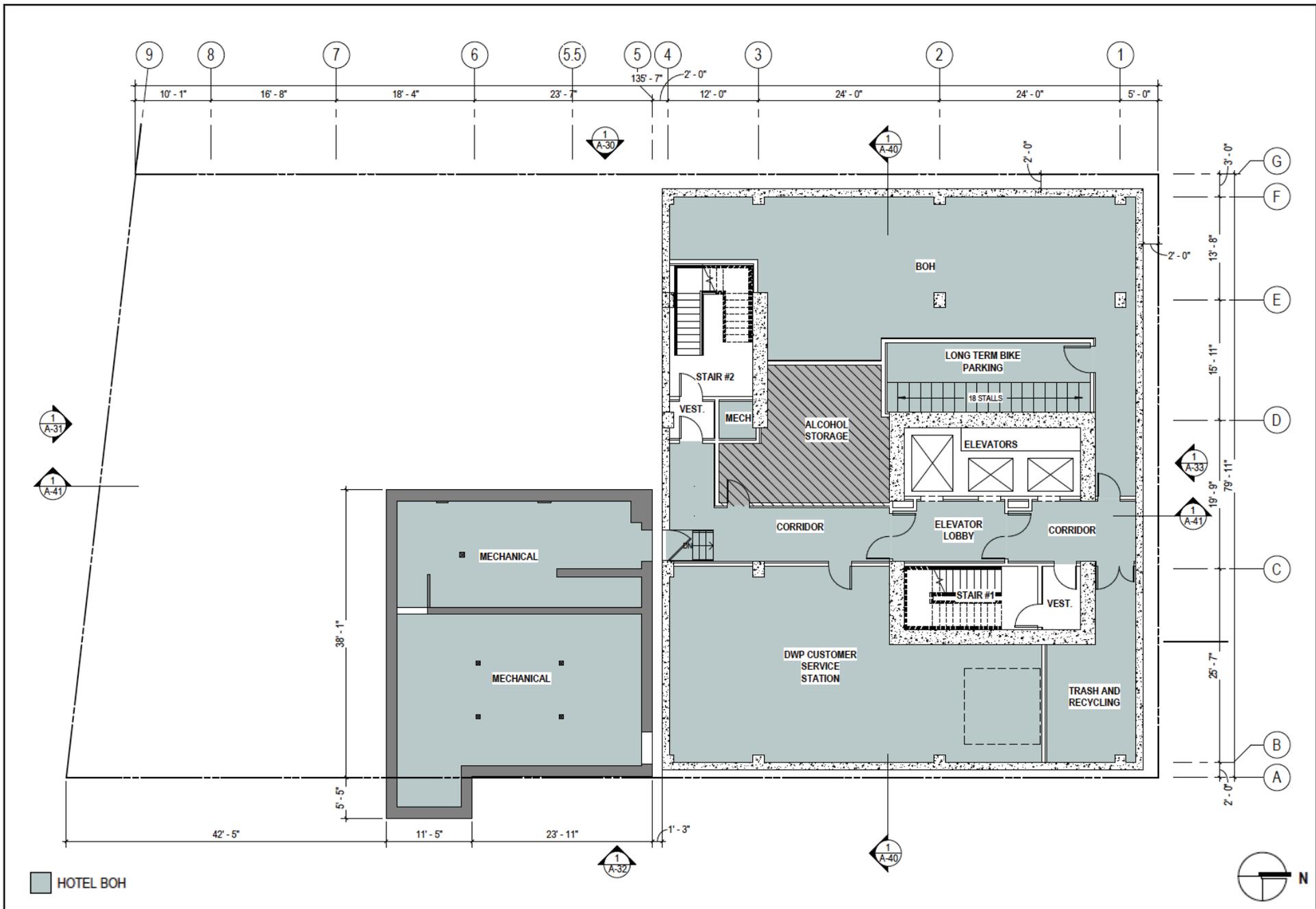
**Table 3.2
Proposed Development Program**

| Land Uses | Quantity | Proposed Floor Area (square feet) |
|---|------------|---|
| Proposed Project | | |
| Hotel (103 guest rooms) | | |
| Double Queen | 19 | 51,708 sf |
| Double Queen ADA | 1 | |
| Junior Suite | 5 | |
| King | 62 | |
| King ADA | 5 | |
| Queen | 2 | |
| Suite | 8 | |
| Suite ADA | 1 | |
| Commercial | | |
| Restaurant, Cafe, Bar | -- | 15,907 sf |
| TOTAL: | 103 | 67,615 sf ^a (6:1 FAR) |
| <i>Notes:</i> | | |
| <i>^a Includes lobby space, galleries, lounge, garden seating, and outdoor patio seating.</i> | | |
| <i>Source: Omgivning, April 2, 2020.</i> | | |



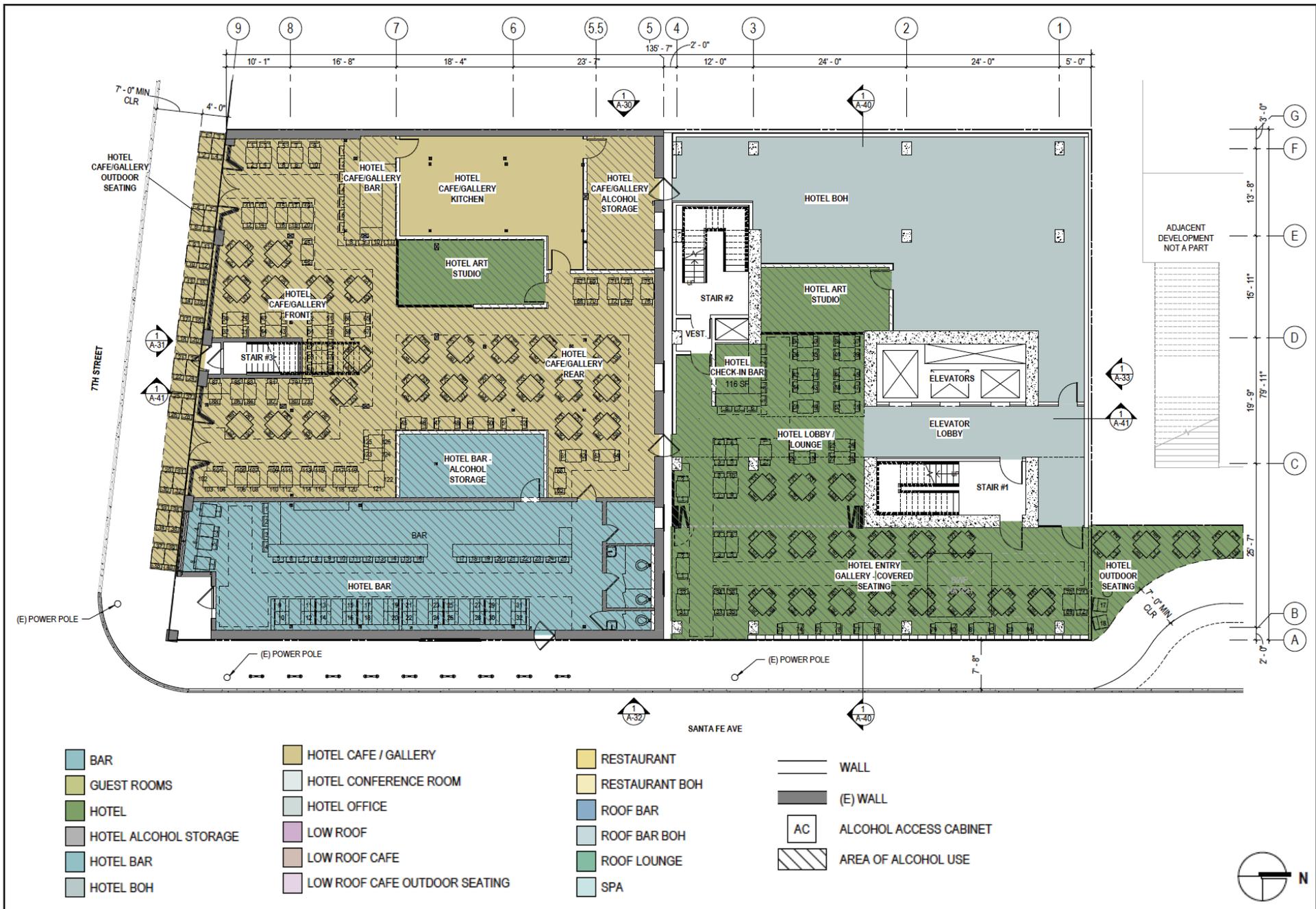
Source: Omgivning, April 2, 2020.

Figure 3.6
Plot Plan



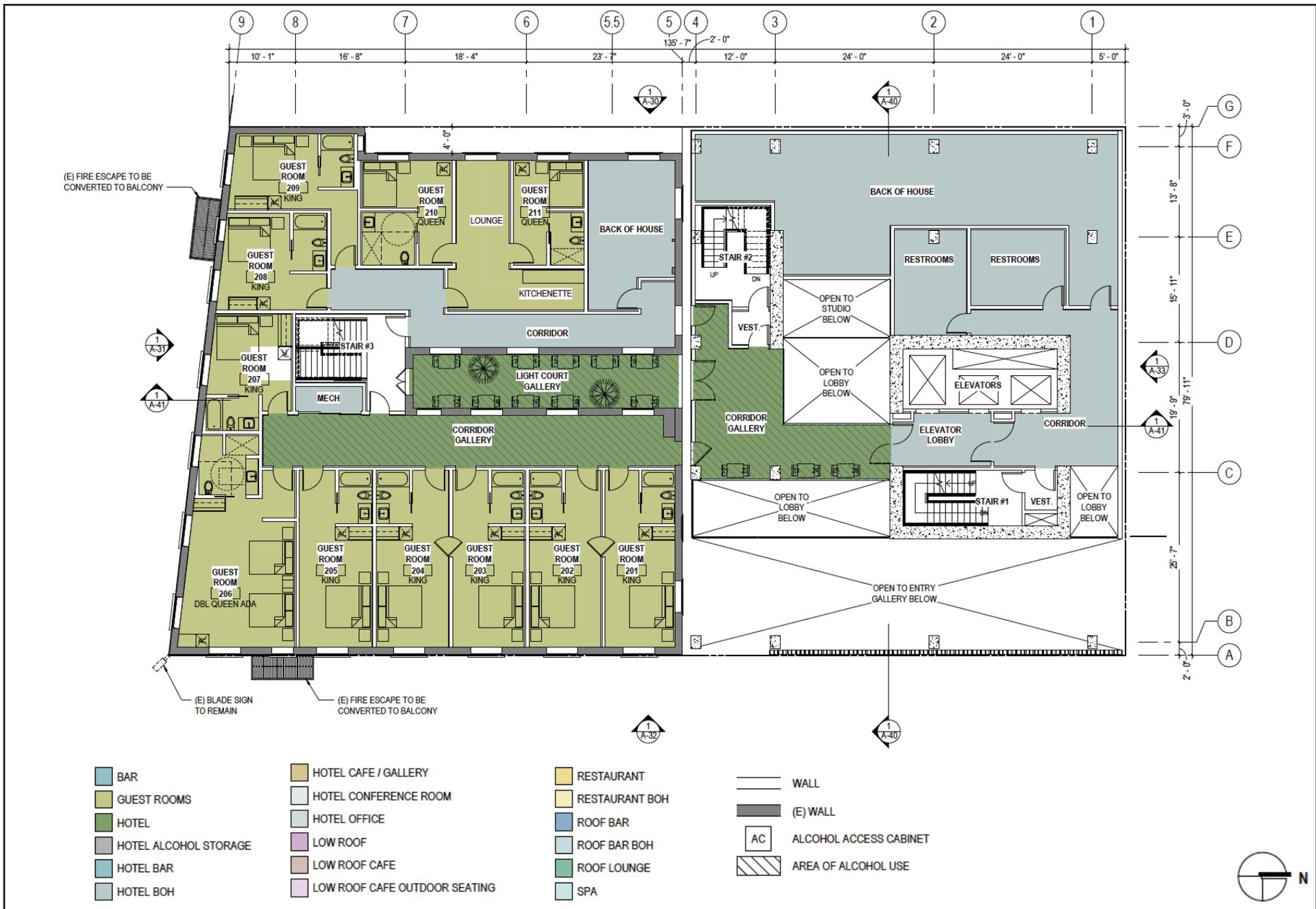
Source: Omgivning, April 2, 2020.

Figure 3.7
Basement Floor Plan



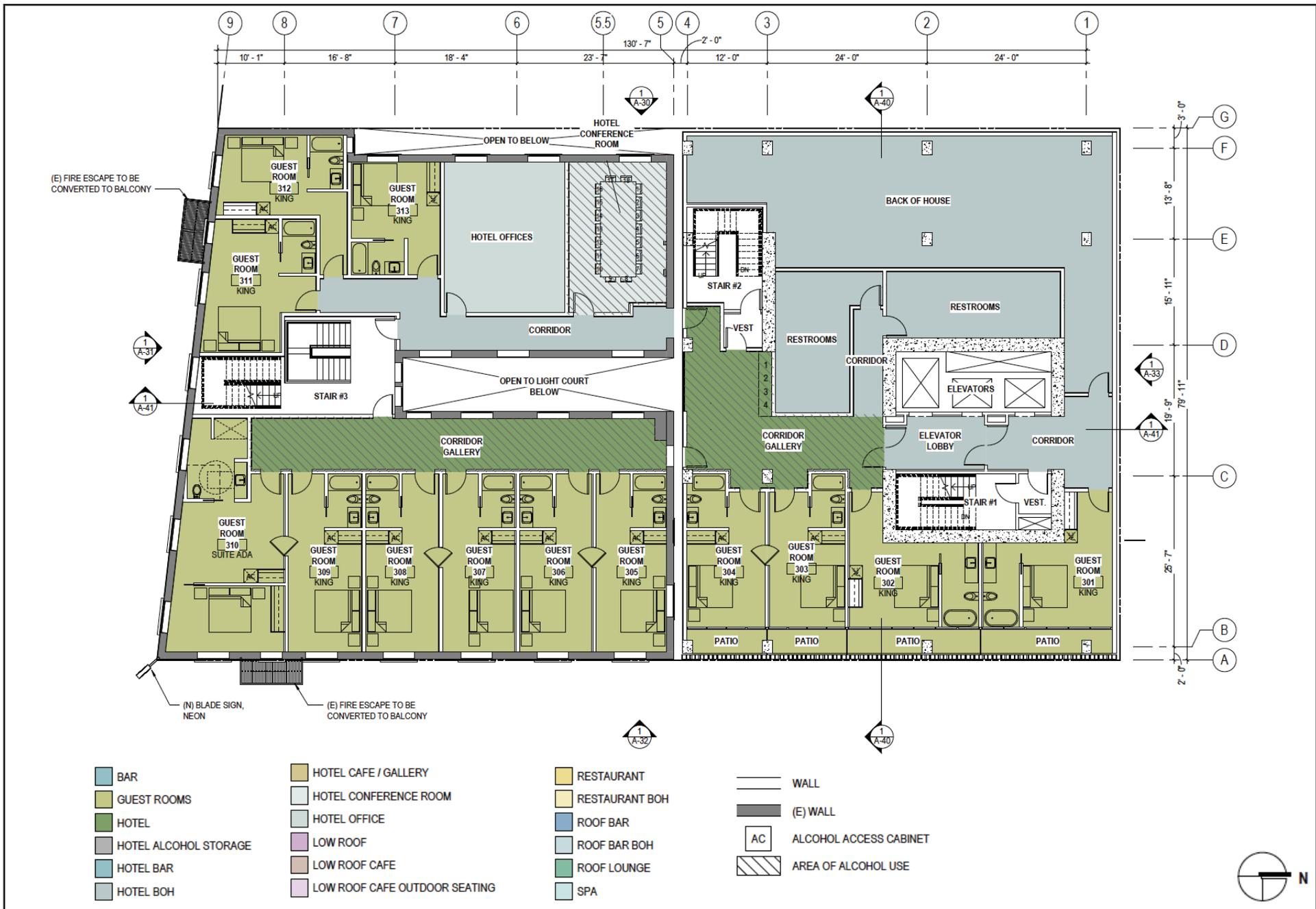
Source: Omgivning, April 2, 2020.

Figure 3.8
First Floor Plan



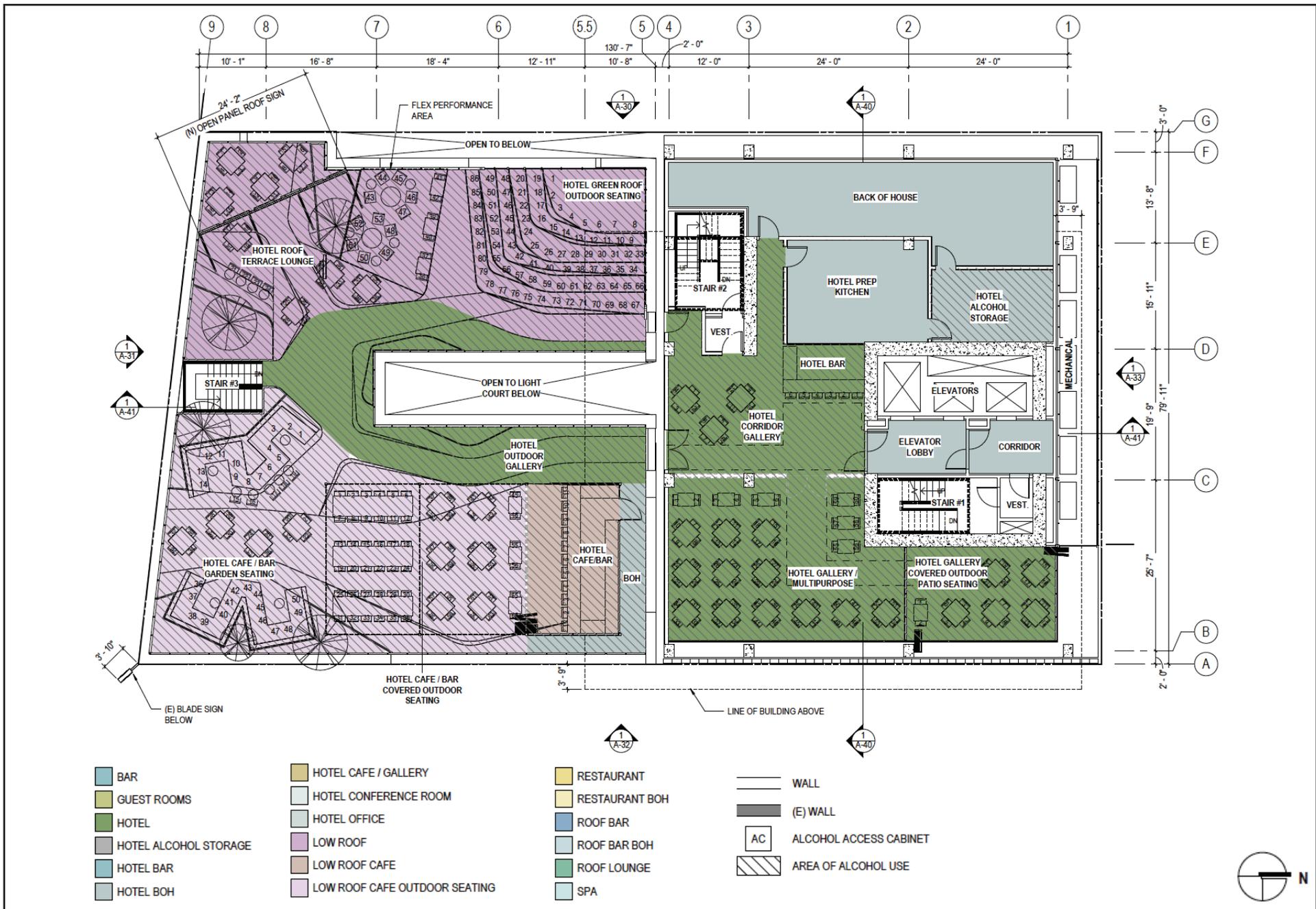
Source: Omgivning, April 2, 2020.

Figure 3.9
Second Floor Plan



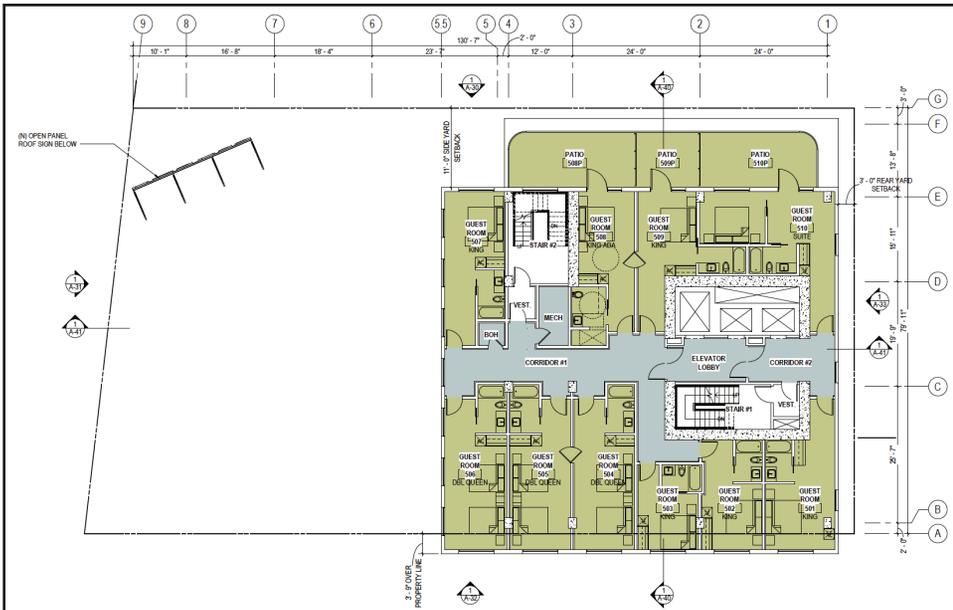
Source: Omgivning, April 2, 2020.

Figure 3.10
Third Floor Plan

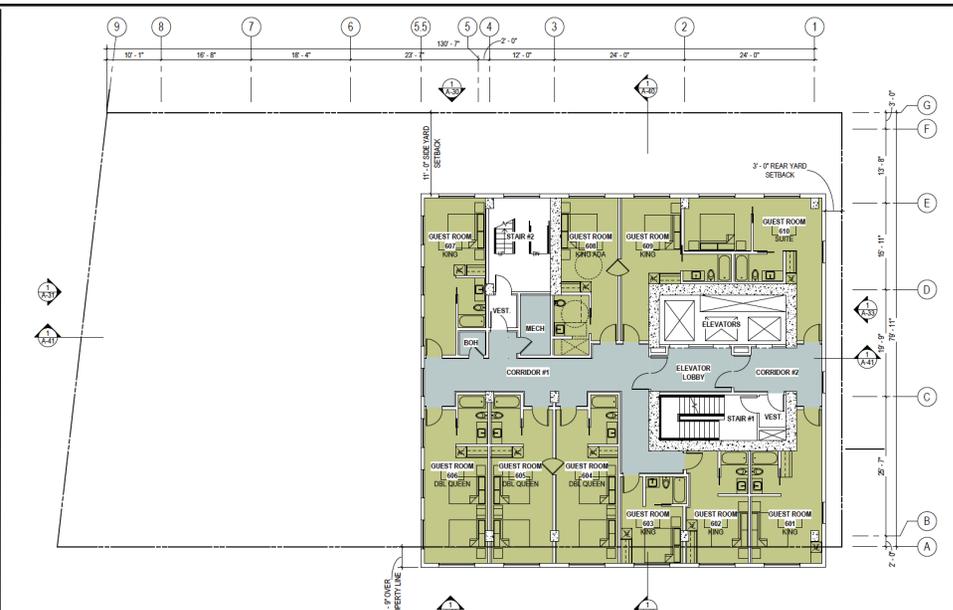


Source: Omgivning, April 2, 2020.

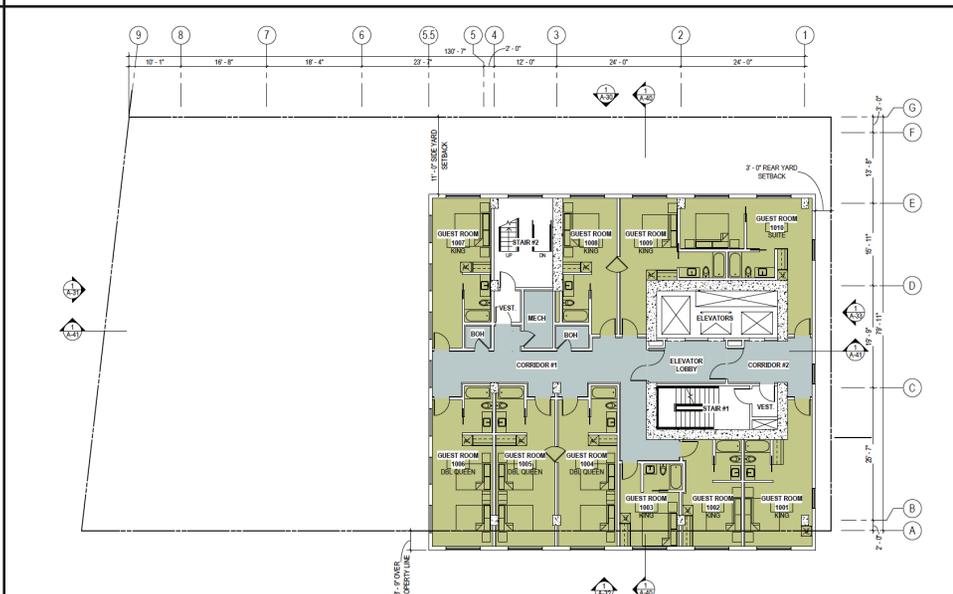
Figure 3.11
Fourth Floor Plan



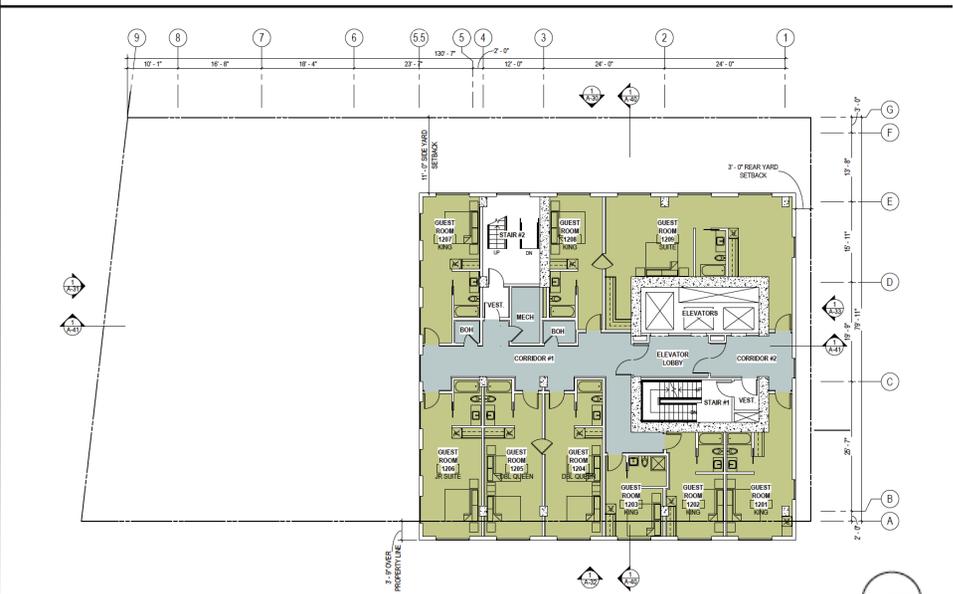
5th Floor Plan



6th to 9th Floor Plan



10th to 11th Floor Plan

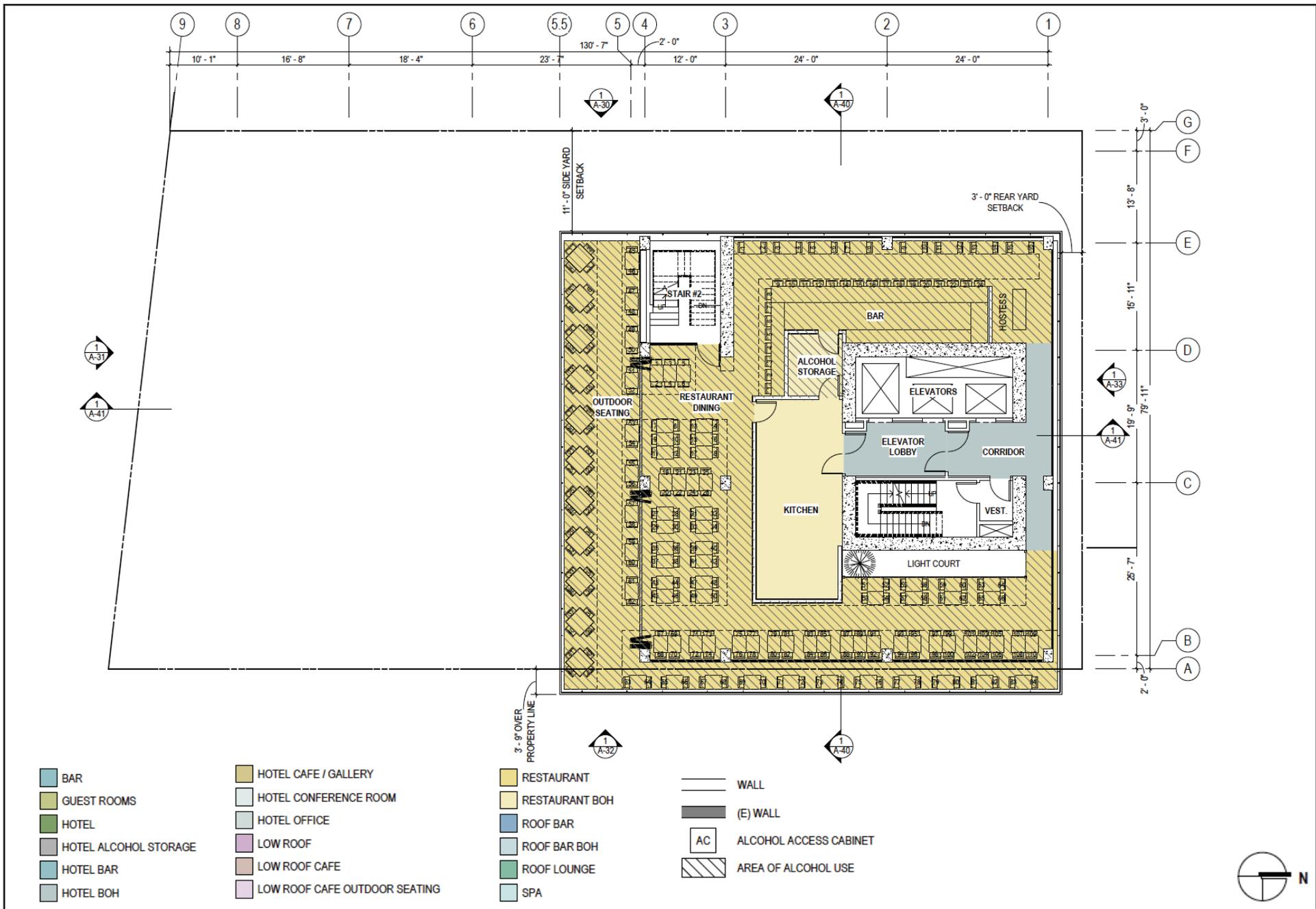


12th Floor Plan

Source: Omgiving, April 2, 2020.

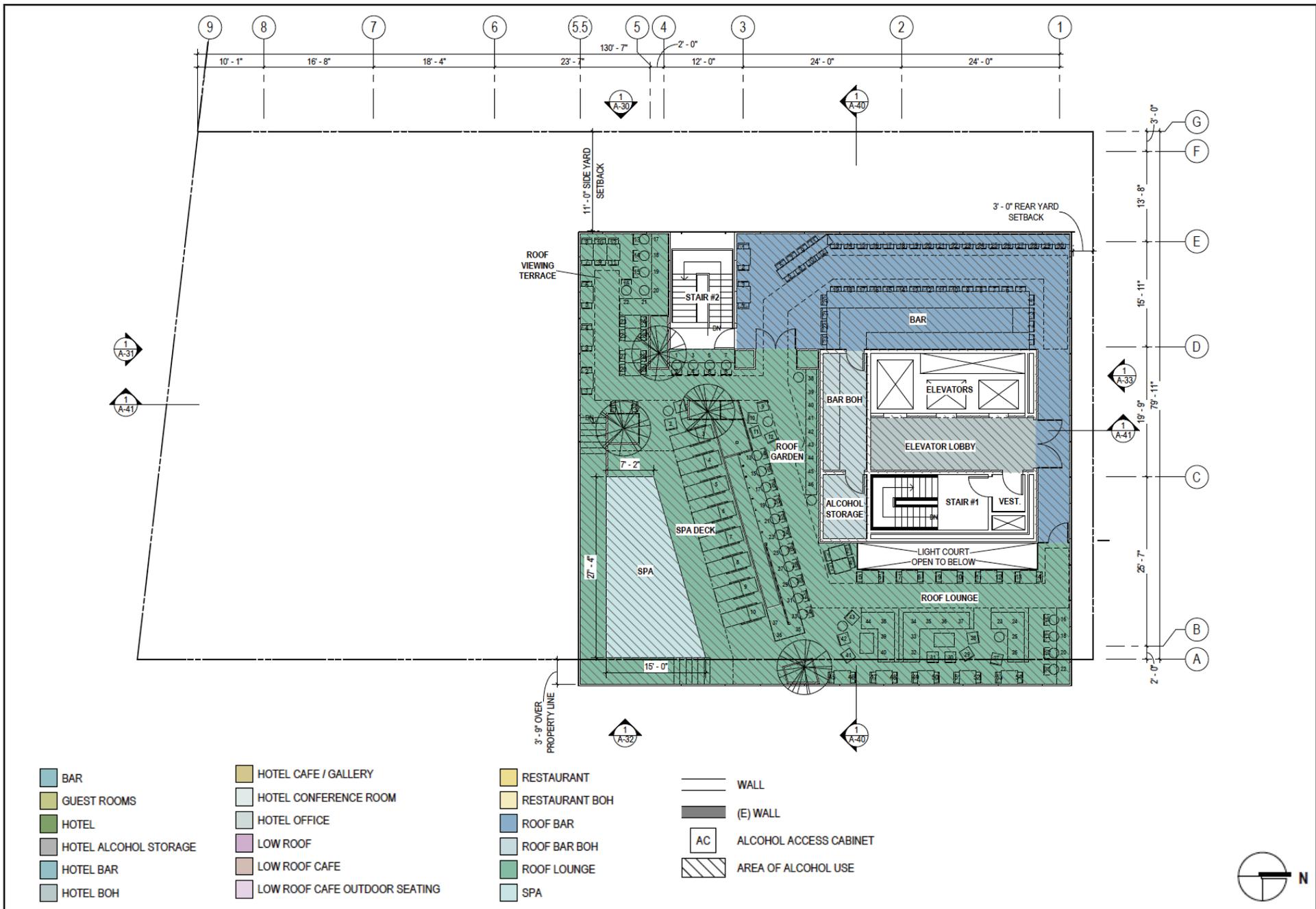


Figure 3.12
Typical Guest Room Floor Plans



Source: Omgivning, April 2, 2020.

Figure 3.13
Thirteenth Floor Plan



Source: Omgivning, April 2, 2020.

Figure 3.14
Fifteenth Floor Plan

2. Floor Area

The Project Site includes a gross lot area of 11,287 square feet and 8,614 square feet of lot area after dedications. The Project Site is currently zoned M3-1-RIO, which has an FAR limit of 1.5:1. The Applicant is seeking a zone and height district change from the M3-1-RIO zone to the C2-2-RIO zone. With approval of this zone change, development on the Project Site would be limited to an FAR of 6:1, resulting in an allowable floor area of 67,721 square feet. The Proposed Project would provide 52,705 square feet of new construction floor area in addition to the existing 14,910 square-foot building that would remain on-site. Therefore, the Project Site would include a total of 67,615 square feet of total floor area, which results in a FAR of 6:1.

3. Building Height

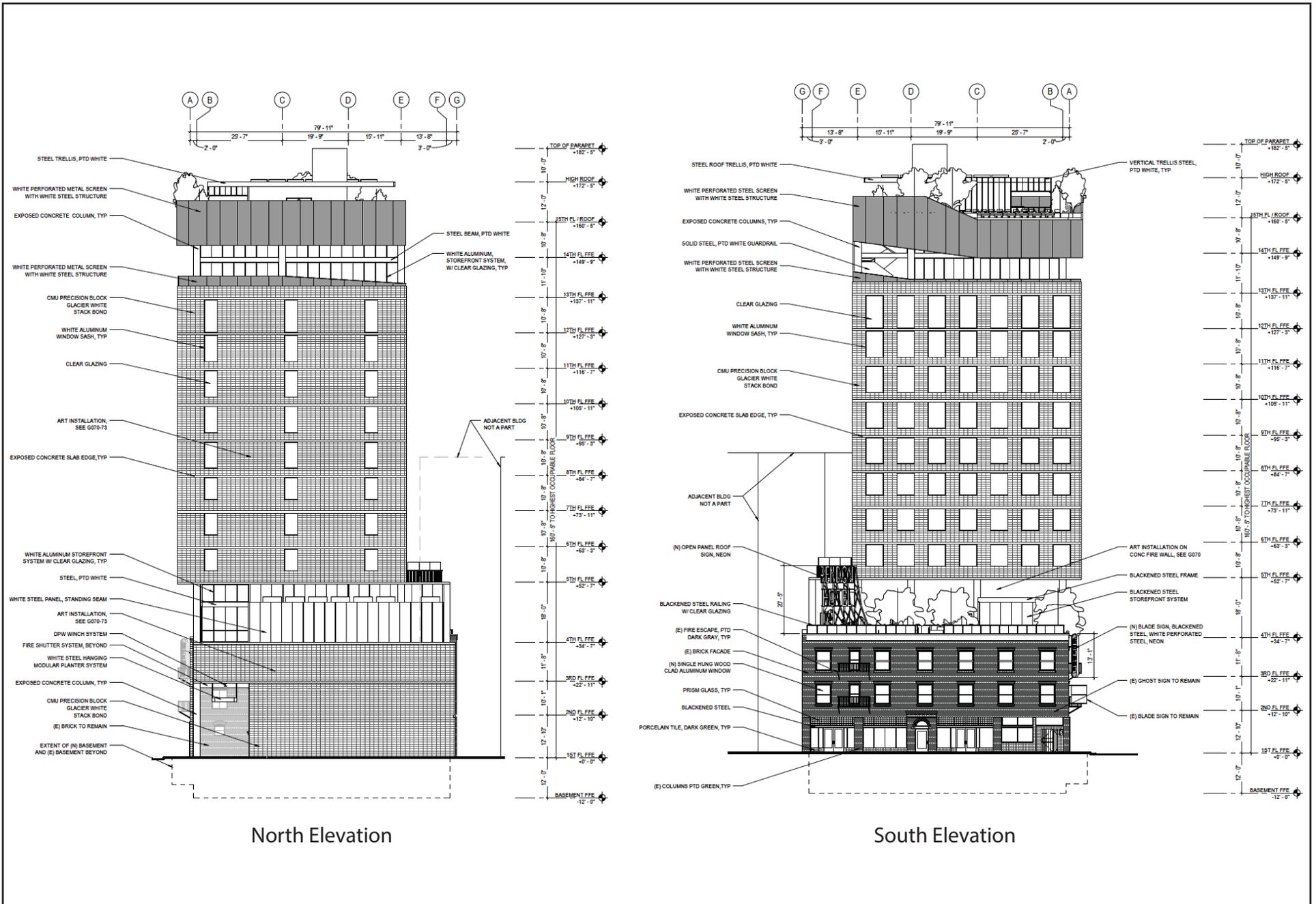
As stated previously, the Project Site is located in Height District No. 1, which does not set a specific height limit for development for the existing M3 zone. As noted above, the Applicant is seeking a zone and height district change from the M3-1-RIO zone (i.e., Height District 1) to the C2-2-RIO zone (i.e., Height District 2). Height District 2 does not specify a height limit, but limits development to 6:1 FAR. The proposed 15-story hotel building is planned for a height of 172 feet and five inches above grade at the top of the roof. Refer to Figures 3.15 through Figure 3.17 for the elevations of the proposed building. Illustrations depicting the building sections of the Proposed Project are provided in Figure 3.18.

4. Setbacks

Pursuant to LAMC Section 12.14(C), no front, side, or rear yard setbacks are required in the C2 Zone for commercial developments. For all residential portions of the building, including hotel uses, the R4 Zone side and rear yard requirements apply. As such, the Proposed Project would be required to provide 16-foot side yard setbacks and a 20-foot rear yard setback. The Proposed Project is requesting a Zoning Administrator's Adjustment to maintain an existing non-conforming 4-foot western side yard setback for the 2nd and 3rd floors of the existing building; to allow a 3-foot rear yard setback, in lieu of a 20-foot rear yard setback, for the hotel addition; and allow an 11-foot western side yard setback, in lieu of a 16-foot side yard setback for the hotel addition on the 5th through 15th floors. As such, the Proposed Project would provide a 15-foot side yard setback along the western property line and a three-foot rear yard setback along the northern property line.

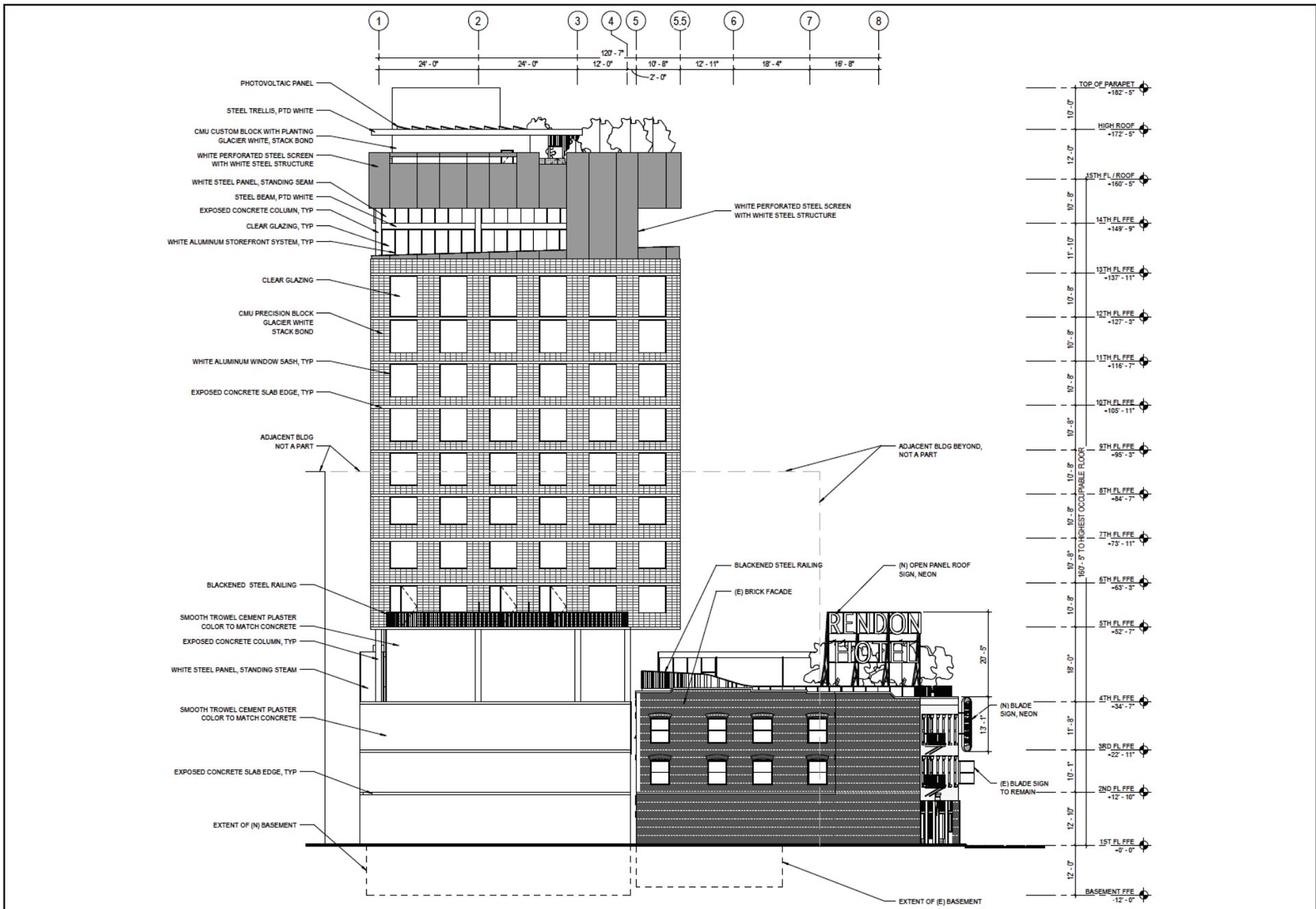
5. Design and Architecture

The Proposed Project's 15-story hotel building addition would be designed with modern architectural materials including photovoltaic panels, steel trellis, perforated steel screen, clear glazing, aluminum storefront systems, brick facades, aluminum window sashes, concrete, steel railings, and cement plasters. The existing building's brick façade would remain. The façade of the 13-story hotel addition would be clad in exposed white CMU blocks with clear glazed windows. The existing building's additional roof appurtenances would include white perforated steel screen structures and railings with clear glazing. Architectural renderings of the Proposed Project are provided in Figure 3.19.



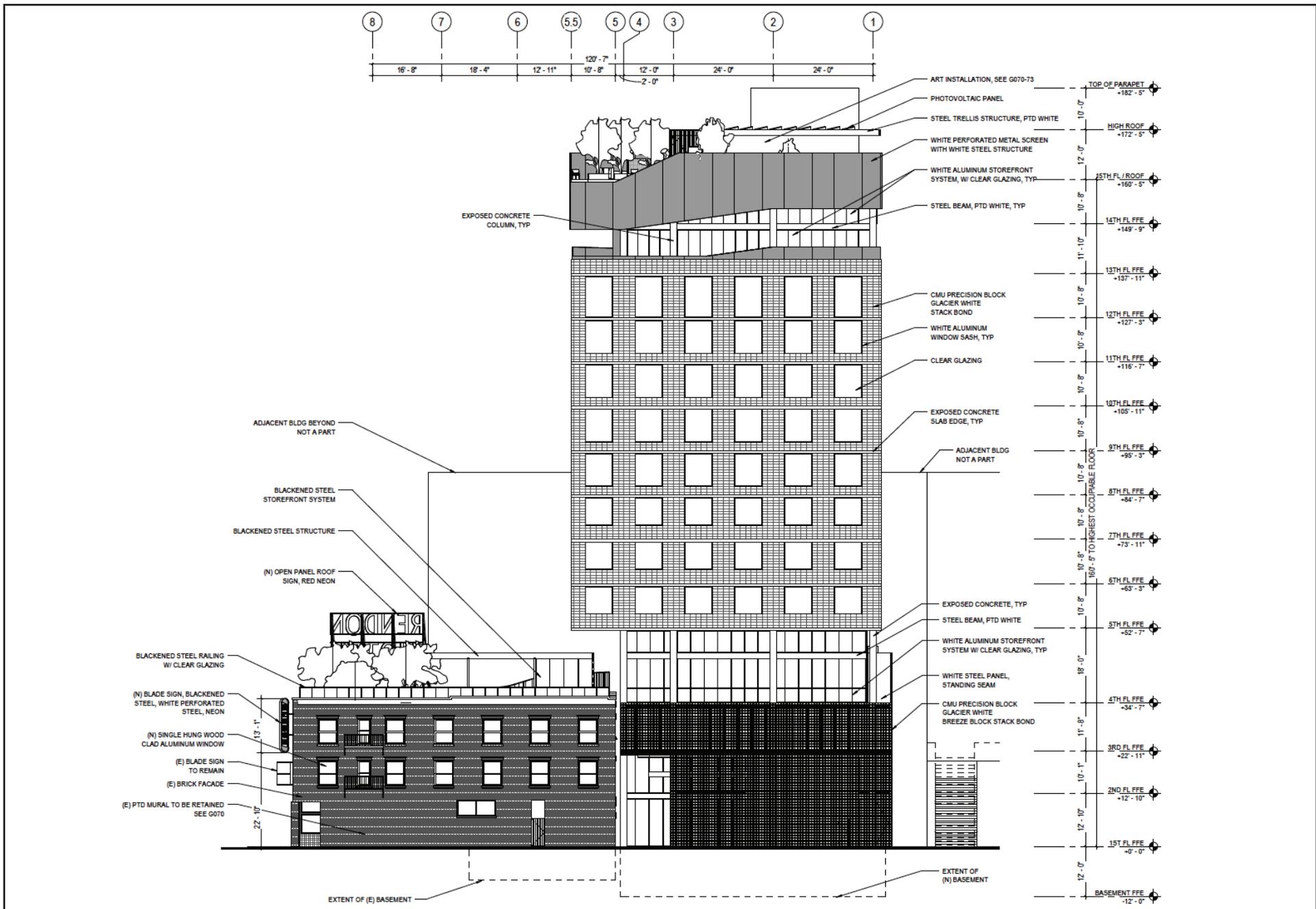
Source: Omgivning, April 2, 2020.

Figure 3.15
North and South Elevations



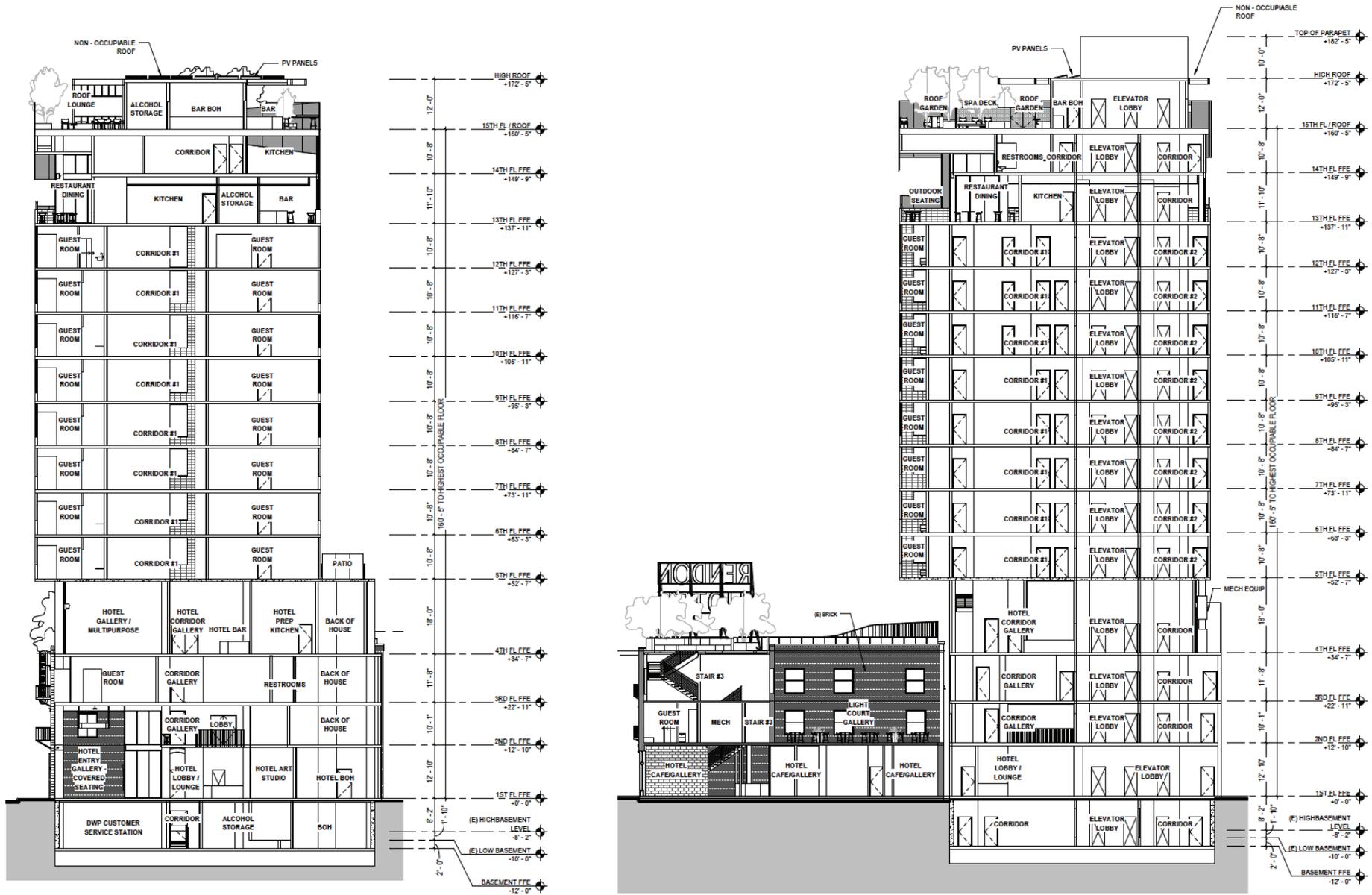
Source: Omgivning, April 2, 2020.

Figure 3.16
West Elevation



Source: Omgivning, April 2, 2020.

Figure 3.17
East Elevation



Cross Section

Longitudinal Section

Source: Omgivning, April 2, 2020.



Aerial View - Facing Northwest



East Elevation at Dusk



South Elevation - Looking Northwest



North Elevation - Looking South

Source: Omgivning, April 2, 2020.

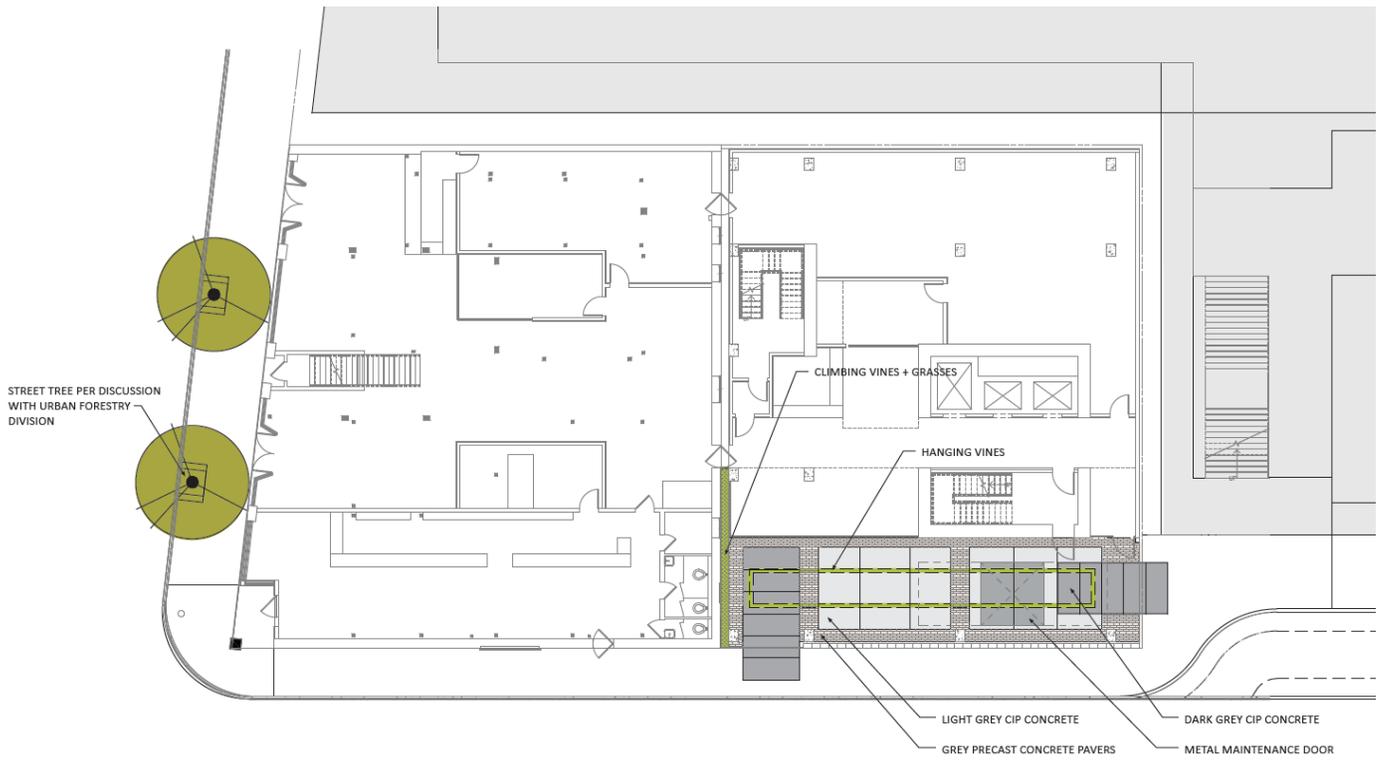
6. Open Space and Landscaping

The Proposed Project would include the construction of a 15-story hotel building. Thus, as a hotel project, the Proposed Project is not required to provide open space. Nevertheless, the Proposed Project would include several outdoor lounges and terrace areas. Figure 3.20 and Figure 3.21 include the landscape plans for the Proposed Project.

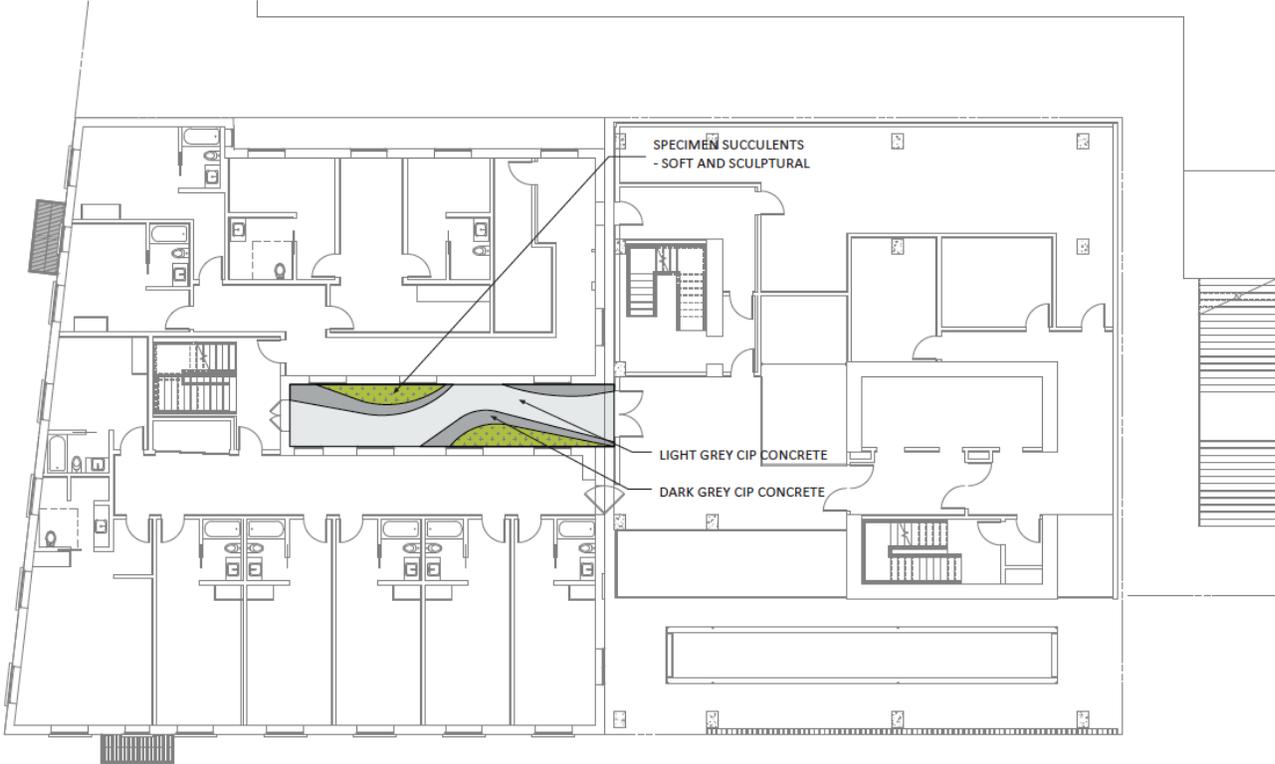
7. Access, Circulation, and Parking

Parking for the Proposed Project would be provided off-site through a private agreement. A valet-option would be provided along Santa Fe Avenue. Refer to Figure 3.22, Valet Drop-Off Options. The Project Site is located in the Central City Parking District and in the East Los Angeles Enterprise Zone. Pursuant to LAMC Section 12.21.A.4(p), one space shall be provided for each two individual guest rooms/suites for the first 20 guest rooms, and one additional parking space for each four guest rooms/suites in excess of 20 but not exceeding 40, and one additional parking space for each six guest rooms/suites in excess of 40. As such, the Proposed Project would be required to provide a total of 26 parking spaces for the hotel use. For the commercial uses, LAMC Section 12.21.A.4.(x), requires at least one automobile parking space for each 500 square feet of combined floor area contained within all the commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings on any lot. As such, the Proposed Project would require 32 commercial parking spaces. Thus, the Proposed Project would be required to provide a total of 58 parking spaces for the hotel and commercial uses. Pursuant to LAMC, Section 12.21.A.4, (Ordinance No. 185,480), residential buildings, including hotels, motels, and apartment hotels, may replace 10 percent of the required automobile parking with bicycle parking, which allows a reduction of two hotel parking spaces. Therefore, as summarized in Table 3.3, the Proposed Project would be required to provide a total of approximately 56 parking spaces. The Applicant is requesting a Variance, pursuant to LAMC Section 12.21.A.4, to allow zero on-site parking spaces, but will provide 56 parking spaces off-site through a private agreement.

The Proposed Project would provide on-site bicycle parking for short-term and long-term bike storage. The Proposed Project would be required to provide one short-term bicycle parking space per 2,000 square foot of commercial space and one long-term bicycle space per 2,000 square foot of commercial space, resulting in a total of 16 bicycle parking spaces (8 short-term and 8 long-term) required for the proposed commercial area. The Proposed Project is also required to provide one short-term bicycle parking space per 20 guest rooms and one long-term bicycle parking space per 20 guest rooms, resulting in a total of 10 required bicycle parking spaces (5 short-term and 5 long-term) for the hotel uses. Thus, the Proposed Project is required to provide a total of 26 bicycle parking spaces on-site (13 short-term and 13 long-term). As summarized in Table 3.4, below, the Proposed Project would be consistent with the applicable parking requirements of the LAMC as amended by Ordinance No. 185,480, effective May 9, 2018, for bicycle parking spaces by providing 13 short-term and 13 long-term bicycle parking spaces with a total of 26 bicycle parking spaces.



Level 1 Landscape Plan



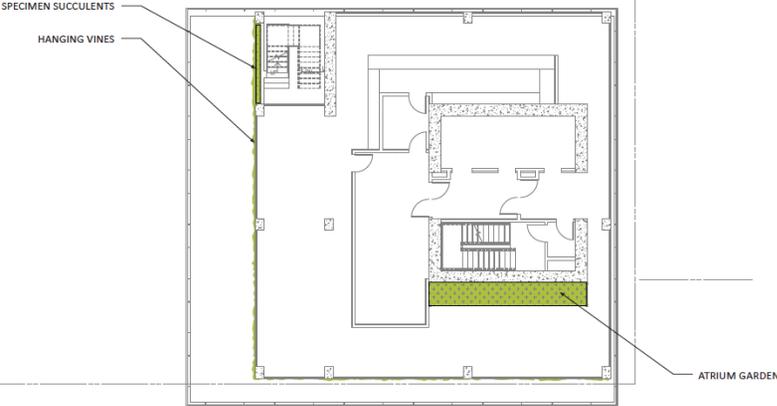
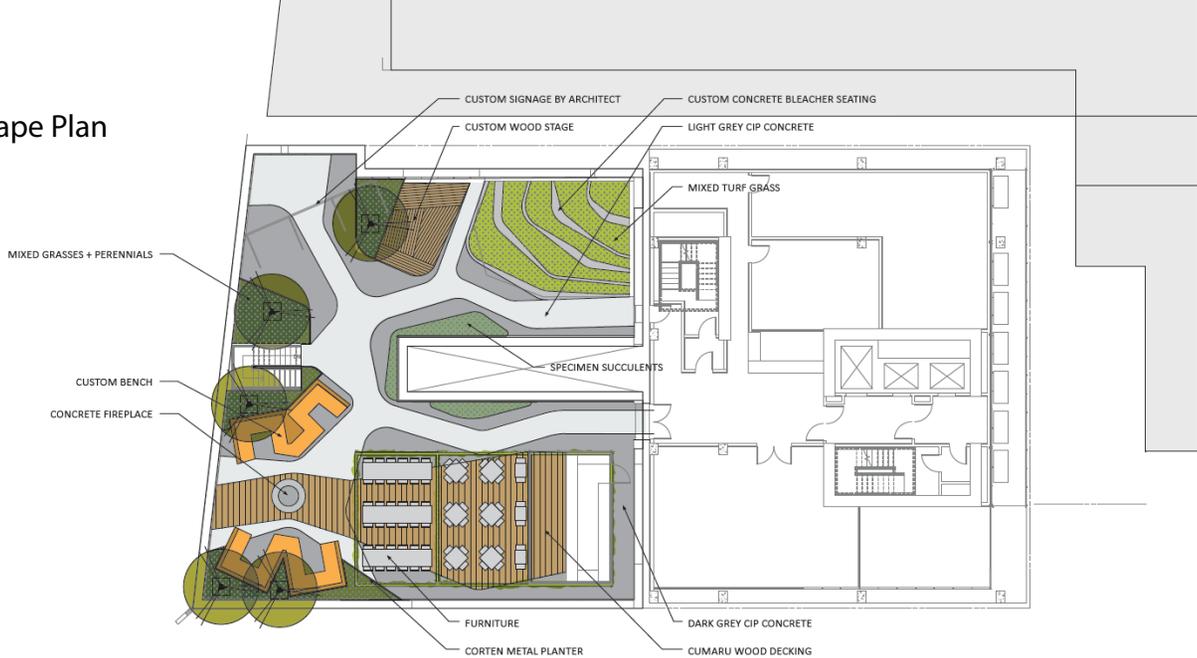
Level 2 Landscape Plan

Source: Superjacent, January 21, 2019.

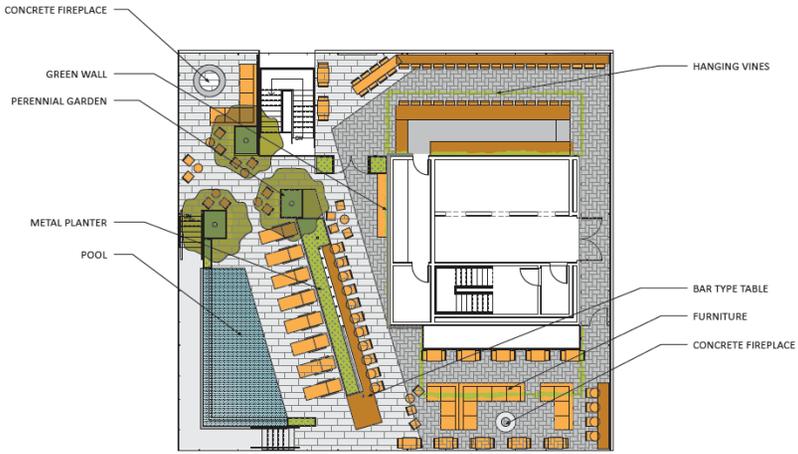


Figure 3.20
Level 1 and 2 Landscape Plans

Level 4 Landscape Plan



Level 13 Landscape Plan

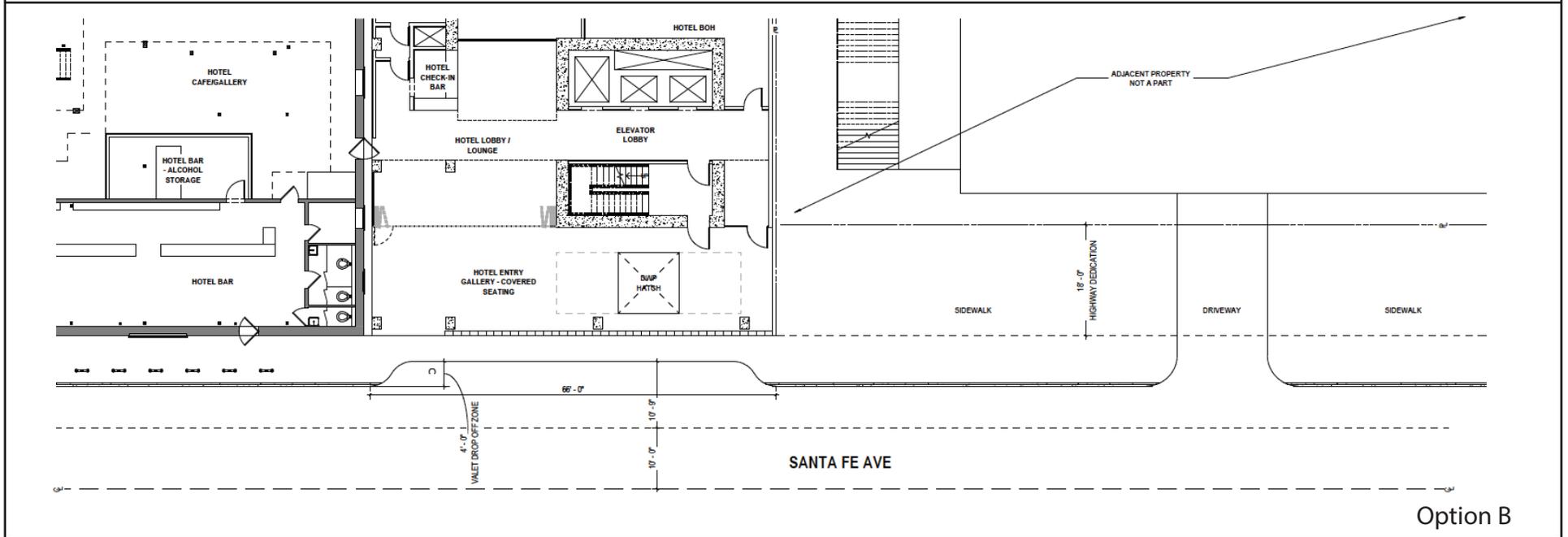
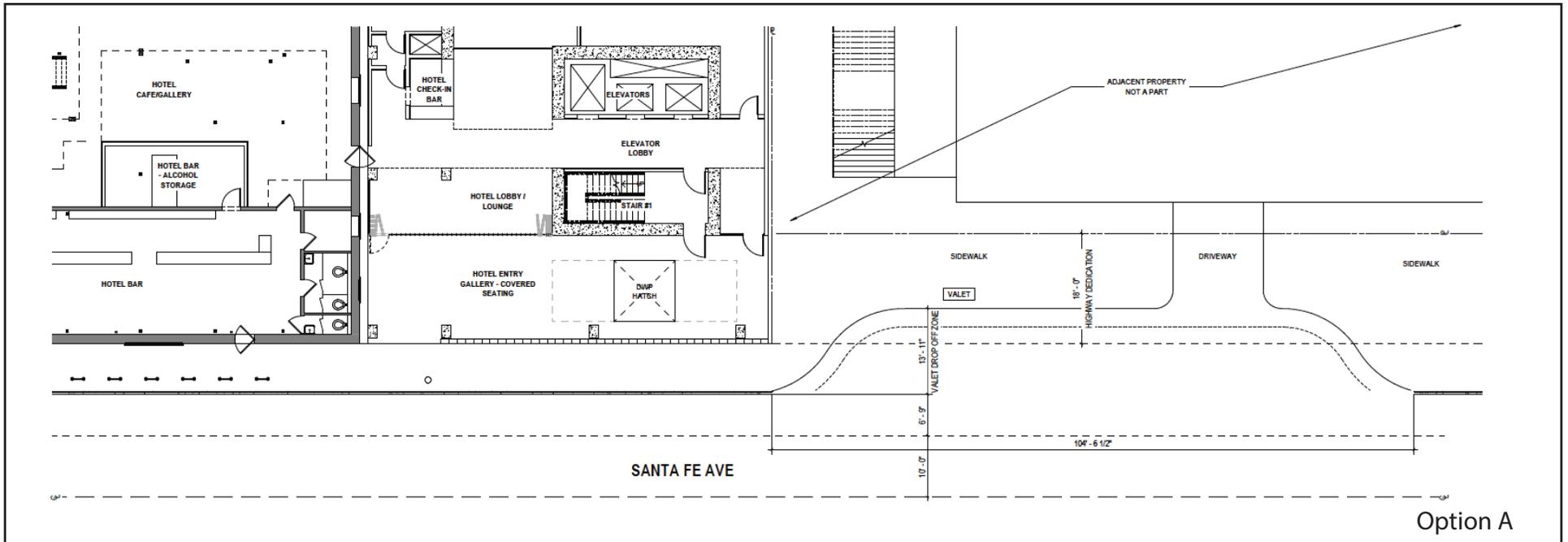


Level 15 Landscape Plan

Source: Superjacent, January 21, 2019.



Figure 3.21
Level 4, 13, and 15 Landscape Plans



Source: Omgivning, January 30, 2020.

**Table 3.3
Summary of Required and Proposed Vehicle Parking Spaces**

| Description | Quantity | Rate ^{a,b} | Spaces |
|--|-----------|---------------------|-----------|
| Required | | | |
| Restaurant/Bar/Commercial | 15,907 sf | 1/500 sf | 32 |
| Hotel (103 guest rooms) | -- | -- | -- |
| Guestrooms 1-20 | | 1 / 2 rooms | 10 |
| Guestrooms 21-40 | | 1 / 4 rooms | 5 |
| Guestrooms 41-103 | | 1 / 6 rooms | 11 |
| Parking Required: | | | 58 |
| 10% Bicycle Parking Reduction (guest room portion only): ^c | | | -2 |
| Net Parking Required: | | | 56 |
| Proposed | | | |
| Parking Proposed On-Site: | | | 0 |
| Parking Proposed Off-Site: ^d | | | 56 |
| <p>Notes:</p> <p><i>sf = square feet</i></p> <p>^a For commercial areas, parking calculations based on ZI No. 2374 (LAMC 12.21.A4(x)(3)), Enterprise Zone / Employment and Economic Incentive Program Area (EZ).</p> <p>^b For hotel space, parking calculations based on Central City Parking District, LAMC Section 12.21 A 4(p).</p> <p>^c Pursuant to Bicycle Ordinance 185,480, hotel buildings may replace 10% of required automobile parking with bicycle parking.</p> <p>^d The required parking would be provided off-site at 695 South Santa Fe Avenue.</p> <p>Source: Omgivning, April 2, 2020.</p> | | | |

**Table 3.4
Summary of Required and Proposed Bicycle Parking Spaces**

| Description | Quantity | Parking Required ^[a] | | Total Spaces Required | | Total Spaces Provided | |
|--|-----------|---------------------------------|--------------|-----------------------|-----------|-----------------------|-----------|
| | | Short-Term | Long-Term | Short - Term | Long-Term | Short-Term | Long-Term |
| Commercial | 15,907 sf | 1 / 2,000 sf | 1 / 2,000 sf | 8 | 8 | 8 | 8 |
| Hotel | 103 rooms | 1 / 20 rooms | 1 / 20 rooms | 5 | 5 | 5 | 5 |
| TOTAL: | -- | -- | -- | 13 | 13 | 13 | 13 |
| <p>Notes: <i>sf = square feet</i></p> <p>^[a] LAMC 12.21 A.16. Bicycle Parking and Shower Facilities.</p> <p>Source: Omgivning, April 2, 2020.</p> | | | | | | | |

8. Lighting and Signage

Exterior lighting features within the Project would consist of low-level illuminated pedestrian walkways and lighting within common open space areas, parking areas, and outdoor courtyards. On-site signage would include site identify and wayfinding signs in accordance with the LAMC.

9. Site Security

During construction, the Project Site would be secured with perimeter fencing and monitored by on-site security personnel. During operations, security would be provided via site planning and secured access points of entry. The plans for the Project will incorporate design guidelines as identified in the “Design Out Crime Guidelines: Crime Prevention Through Environmental Design,” published by the Los Angeles Police Department. Such design guidelines provide security design measures for semi-public and private spaces, which may include but not be limited to access control to the building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with minimum dead space to eliminate areas of concealment, and location of building entrances in high-foot traffic areas.

10. Sustainability Features

The Proposed Project would also be required to comply with the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. As further described in the Energy section in the IS/MND, below, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Proposed Project’s energy consumption.

11. Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 18 months, with final buildout occurring in 2024. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition and site clearing; (2) grading, excavation, and foundations; (3) building construction; and (4) finishing and architectural coatings. All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in LAMC Section 41.40, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Proposed Project would comply with these restrictions.

Demolition/Site Clearing Phase

This phase would include the site clearing of the northern portion of the Project Site that includes surface parking areas. In addition, this phase may include the removal of the northern façade of the existing building, fences, and associated debris to construct the 15-story hotel addition. The demolition and site-clearing phase would be completed in approximately one month.

Grading, Excavation, and Foundation Phase

After the completion of the demolition and site clearing phase, the grading and excavation phase for the Proposed Project would occur for approximately two months and would involve excavation for the subterranean level and grading to ensure the proper base and slope for the building foundations. The Project proposes up to 2,500 cubic yards of soil export to be hauled off site.

Building Construction Phase

The building construction phase consists of above grade structures and is expected to occur for approximately 12 months. The building construction phase includes the construction of the proposed building, renovation and additional floor area of the existing building, connection of utilities to the building, building foundations, laying irrigation for landscaping, and landscaping the Project Site.

Finishing/Architectural Coating Phase

The finishing/architectural coating phase is expected to occur over approximately three months. During this phase, interior cabinets and lighting fixtures would be installed, interior and exterior wall finishing and paint would be applied, and the installation of windows, doors, cabinetry, and appliances within the guest room units and commercial areas would take place.

Temporary Right-of-Way Encroachment

Construction activities would necessitate temporary lane closures on 7th Street and Santa Fe Avenue, adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Traffic lane and right-of-way closures, including sidewalks, if required, would be properly permitted by the City agencies and would conform to City standards.

As discussed further in the Transportation and Traffic analysis, below in Section XVII, Mitigation Measure MM-TR-1 requires preparation of a Construction Management Plan that shall be submitted to LADOT review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. All construction related traffic shall be restricted to off-peak hours. In accordance with City policy, pedestrian routes on 7th Street and Santa Fe Avenue, fronting the Project Site, will be maintained and protected from the active construction site. Temporary detours would be coordinated with the City on an as needed basis.

Haul Route

All construction and demolition debris would be recycled to the maximum extent feasible. For recycling efforts, it was assumed that all recyclable construction and demolition debris would be hauled to the Waste Management Downtown Diversion recycling facility, located at 2424 East

Olympic Boulevard in Los Angeles, which is located approximately 0.7 mile (driving distance) south of the Project Site (approximately 1.4 miles round trip).¹ Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon landfill, which accepts construction and demolition debris and inert waste from areas within the City of Los Angeles. The Sunshine Canyon Landfill is approximately 30 miles north of the Project Site (approx. 60 miles round trip).

The local haul route would utilize 7th Street and the Breed Street on-ramp and Santa Fe Avenue / Mateo Street off-ramp to and from the I-10 Freeway, respectively. The haul route specified above may be modified in compliance with applicable City policies, provided LADOT and/or Street Services approves any such modification.

12. Related Projects

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project’s cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

“(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project’s incremental effect, though individually limited, is cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

(2) A lead agency may determine in an initial study that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.

(3) A lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative

¹ Construction and Demolition Debris Recycling Facilities in Los Angeles County, updated February 19, 2020, website: https://dpw.lacounty.gov/epd/CD/cd_attachments/Recycling_Facilities.pdf, accessed March 2020.

problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.”

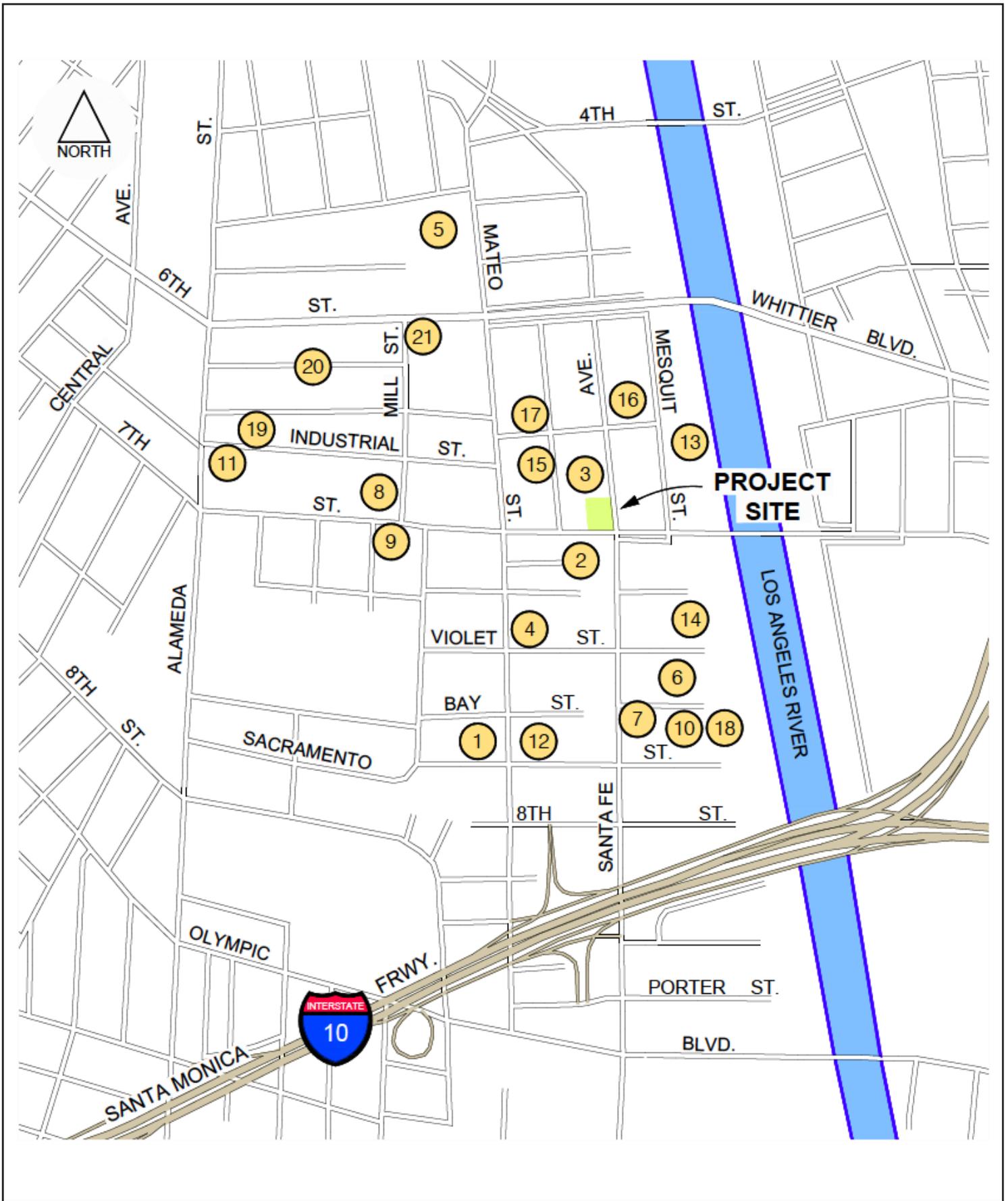
In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the “list” and “plan” approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Proposed Project, were identified for evaluation.

The related projects identified are included in Table 3.5, Related Projects List, below. A total of 21 related projects were identified within the vicinity of the Project Site in the City of Los Angeles. An analysis of the cumulative impacts associated with these related projects and the Proposed Project are provided under each individual environmental impact category in Section 4 of this IS/MND. The locations of the related projects are shown in Figure 3.23, Location of Related Projects.

**Table 3.5
Related Projects List**

| Project Number | Project Name | Location/Address | Project Description | Size | Units |
|---|-----------------------------------|----------------------------------|---|---|--|
| City of Los Angeles Projects^a | | | | | |
| 1 | 1005 South Mateo Street | 1005 South Mateo Street | Industrial Park | 94,849 | sf |
| 2 | Ford Factory | 2030 East 7 th Street | Office Retail | 243,583 40,000 | sf sf |
| 3 | AMP Lofts Mixed-Use Project | 2051 East 7 th Street | Apartment Restaurant Retail | 320 5,000 15,000 | du sf sf |
| 4 | 826 South Mateo Street | 826 South Mateo Street | Live/Work Retail Restaurant | 90 11,000 5,600 | du sf sf |
| 5 | At Mateo Project | 555 South Mateo Street | Retail Office | 122,624 48,040 | sf sf |
| 6 | 2130 East Violet Street | 2130 East Violet Street | Office Retail Restaurant | 84,200 3,500 4,000 | sf sf sf |
| 7 | SoHo House Project | 1000 South Santa Fe Avenue | Market Health Club (spa) Restaurant | 14,193 6,793 10,065 | sf sf sf |
| 8 | The Walnut Mixed-Use Development | 1745 East 7 th Street | Apartment Retail | 57 6,000 | du sf |
| 9 | 1800 East 7 th Street | 1800 East 7 th Street | Apartment Office High-Turnover Restaurant Specialty Retail | 122 2,700 4,605 3,245 | du sf sf sf |
| 10 | 2110 Bay Street Mixed-Use Project | 2110 Bay Street | Apartment Affordable Housing Office Shopping Center | 99 11 113,350 43,657 | du du sf sf |
| 11 | 668 S. Alameda Street | 668 South Alameda Street | Live/Work Apartment Live/Work Office Specialty Retail Office Restaurant Supermarket | 475 25,200 17,500 7,900 16,300 15,300 | du sf sf sf sf sf |
| 12 | 1024 Mateo Street Mixed-Use | 1024 South Mateo Street | Apartment Office Restaurant Retail Live/Work Office | 106 92,740 13,126 13,979 2,250 | du sf sf sf sf |
| 13 | 670 Mesquit | 670 Mesquit Street | Office Apartment Hotel Retail Restaurant Gym Studio/Event/Gallery/ Museum Grocery | 944,055 308 236 79,240 89,576 62,148 93,617 56,912 | sf du rm sf sf sf sf sf |
| 14 | 2143 Violet Project | 2143 East Violet Street | Apartment Retail | 347 21,858 | du sf |

| | | | | | |
|--|----------------------------------|----------------------------------|--------------------------|---------|-----|
| | | | Office | 187,374 | sf |
| 15 | District Centre Mixed-Use | 676 South Mateo Street | Live/Work Apartment | 185 | du |
| | | | Live/Work Office | 3,900 | sf |
| | | | Restaurant | 15,005 | sf |
| | | | Retail | 8,375 | sf |
| 16 | 640 South Santa Fe Avenue | 640 South Santa Fe Avenue | Office | 91,185 | sf |
| | | | Retail | 9,430 | sf |
| | | | Restaurant | 6,550 | sf |
| 17 | 641 Mixed-Use Development | 641 South Imperial Street | Live/Work Apartment | 140 | du |
| | | | Retail | 7,375 | sf |
| | | | Office | 7,375 | sf |
| 18 | 2159 Bay Street Project | 2159 East Bay Street | Office | 202,954 | sf |
| | | | Meeting Space | 3,235 | sf |
| | | | Quality Restaurant | 10,860 | sf |
| | | | High-Turnover Restaurant | 10,860 | sf |
| 19 | Camden Arts Mixed-Use Project | 1525 East Industrial Street | Mid-Rise Apartment | 346 | du |
| | | | Office | 24,045 | sf |
| | | | Restaurant | 5,500 | sf |
| 20 | 6AM Project | 640 Alameda Street | Residential | 1,736 | du |
| | | | Office | 253,514 | sf |
| | | | Quality Restaurant | 22,639 | sf |
| | | | High-Turnover Restaurant | 22,639 | sf |
| | | | Retail | 82,332 | sf |
| | | | Art Museum | 22,429 | sf |
| | | | Hotel | 514 | rm |
| | | | School | 300 | stu |
| | | | Warehouse to be removed | 316,632 | sf |
| 21 | 1340 East 6 th Street | 1340 East 6 th Street | Apartment | 193 | du |
| <p>Notes: du = dwelling unit, sf = square feet, stu = student, rm = rooms Source: Crain & Associates, Rendon Hotel Project, March 2020.</p> | | | | | |



Source: Crain & Associates, January 2020.

D. Requested Permits and Approvals

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

- (1) Pursuant to LAMC Section 11.5.6, a General Plan Amendment to the Central City North Community Plan to change the Community Plan land use designation from Heavy Industrial to Regional Center Commercial.
- (2) Pursuant to LAMC Section 12.32.F and 12.32.Q, a Zone Change and Height District Change from M3-1-RIO to C2-2-RIO.
- (3) Pursuant to LAMC Section 12.24.W.1, a Conditional Use permit to allow the sale of a full-line of alcoholic beverages for on-site consumption on the premises.
- (4) Pursuant to LAMC Section 12.24.W.18, a Conditional Use permit to permit public dancing on the premises.
- (5) Pursuant to LAMC Section 12.28.A, a Zoning Administrator's Adjustment to maintain an existing non-conforming 4-foot western side yard setback for the 2nd and 3rd floors of the existing building; to allow a 3-foot rear yard setback, in lieu of a 20-foot rear yard setback, for the hotel addition; and allow a 11-foot western side yard setback, in lieu of a 16-foot side yard setback for the hotel addition on the 5th through 15th floors.
- (6) Pursuant to LAMC Section 16.50, Site Plan Review approval for a development project that results in an increase of 103 guest rooms.
- (7) Pursuant to LAMC Section 12.27, a Zone Variance to permit relief from LAMC Section 12.21-A,4, for zero on-site parking spaces.

In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: hauling, demolition, grading, foundation, building and tenant improvements.

INITIAL STUDY

Section 4. Environmental Checklist and Impact Analysis

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387)), as amended on January 1, 2019.

I. Aesthetics

| 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. In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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. A significant impact may occur if the Proposed Project includes a proposal to develop or allow development in an existing natural open space area or has the potential to introduce features that would block or detract from the existing valued aesthetic quality of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend

into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

As shown in the site photographs depicted in Figure 3.4, Photographs of the Project Site and Figure 3.5, Photographs of the Surrounding Uses, the Project Site is currently occupied by a three-story hotel building and paved surface parking lot. The Project Site is immediately surrounded by a mix of commercial uses (including restaurants, retail, and cafes), mixed-use residential, multi-family residential, office, manufacturing, and industrial uses, which range from one to five stories above grade. The surrounding topography is relatively level across the Project vicinity. Views in the vicinity of the Project Site are largely constrained by adjacent structures. No scenic views are provided from or through the Project Site. The Project Site is an infill lot within a developed area of the Central City North Community Plan area. Additionally, the Project Site does not possess any unique aesthetic characteristics, such as architectural or historic significance or visual prominence, public plazas, art or gardens, trees protected by the City, pedestrian amenities, or landscaped parks. The Proposed Project would expand the existing three-story building with a 15-story hotel building approximately 172 feet and five inches above grade at the highest point. The Proposed Project would alter the existing views and character of the Project Site and immediate surrounding area in a manner that is compatible with the urban form of the surrounding neighborhood. Due to the relatively flat topography and extent of development within the immediate area, there are no scenic vistas or vantage points that offer views of scenic vistas.

The Proposed Project would not block or detract from the existing valued aesthetic quality of a scenic vista. The Proposed Project would redevelop an existing infill site that has frontage on 7th Street and Santa Fe Avenue. Neither 7th Street nor Santa Fe Avenue is designated as a scenic highway.² Development of the Proposed Project would not impact the view corridors along 7th Street or Santa Fe Avenue. The Proposed Project would not diminish or block scenic views, and the Project’s design would be visually consistent with the surrounding area. As such, the Proposed Project would not have a substantial adverse effect on a scenic vista, and a less than significant impact would occur.

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. A significant impact may occur if scenic resources would be damaged and/or removed by development of a project. The Project Site is currently developed with a three-story hotel building and a surface parking lot. The existing building is not listed on the National Register, California Register, or local listing. The Project Site does not contain any historic structures or scenic resources on site. There are two historical resources in the Project Site area: the Ford Motor Company Factory building, located at 2046-2060 East 7th Street and the Seventh Street Bridge, located along 7th Street, between South Santa Fe Avenue and South

² *City of Los Angeles, Department of City Planning, Mobility Plan 2035: An Element of the General Plan, September 7, 2016.*

Myers Street to the southeast of the Project Site.³ The Ford Motor Company Factory and the Seventh Street Bridge are separated by 7th Street and Santa Fe Avenue, respectively. Therefore, development of the Proposed Project would not negatively affect the physical integrity of any historical resource. Further, there are no significant trees or unique geologic features on-site. The Project Site is not bordered by or within the viewshed of any designated scenic highway as identified in the Mobility Element of the City of Los Angeles General Plan.⁴ Therefore, the Proposed Project would have a less than significant impact to scenic resources, historical structures, and scenic highways.

c) In non-urbanized areas, substantially degrade the existing visual character or quality 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. A significant impact may occur if the Proposed Project were to introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines.

Existing On-site Graffiti and Murals

The existing building on the Project Site contains graffiti on the facade fronting Santa Fe Avenue. Some of the graffiti has covered over prior larger drawings or murals that may have at one time constituted public artwork. The Proposed Project would not demolish the on-site building, and the existing graffiti and murals on the eastern façade would remain.

The Mural Ordinance (Ord. 182,706), codified in the Los Angeles Municipal Code (LAMC) Section 14.1 (Original Art Murals) was adopted in August 2013 to allow for the creation of new original art murals (OAM) on private property. These regulations relating to OAMs in the City of Los Angeles further the following purposes: (1) encouraging artistic expression; (2) fostering a sense of pride; (3) preventing vandalism at mural sites through the installation of murals that vandals are reluctant to disturb; and (4) preserving existing murals that are a valued part of the history of the City of Los Angeles. Under the Mural Ordinance, the creation of an OAM, or designation of a vintage original art mural requires registration with and approval by the City’s Cultural Affairs Commission. The Department of Cultural Affairs shall have the authority to determine that an application for an OAM meets all the applicable registration requirements as established in the Mural Ordinance Administrative Rules. The Mural Ordinance requires that a registered mural remain in place for a minimum of two years, in which the owner may request the removal of a mural under certain circumstances at the expiration of the two-year period. The Applicant would comply with the Mural Ordinance, and as indicated on the site plan and

³ GPA Consulting, *Rendon Hotel, Los Angeles, California, Historical Resource Technical Report, March 2019 (See Appendix B to this IS/MND)*.

⁴ *City of Los Angeles, Department of City Planning, Mobility Plan 2035: An Element of the General Plan, September 7, 2016.*

illustrative renderings (See Figure 3.19, Architectural Renderings), the existing graffiti and murals on the eastern façade would remain. Therefore, the Proposed Project would not damage any registered murals and shall comply with the LAMC Mural Ordinance.

Proposed Project

The Proposed Project would be required to comply with all applicable building code requirements, including LAMC Section 91.8104, which requires every building, structure, or portion thereof, to be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material. In addition, notwithstanding compliance with the Mural Ordinance discussed above, the removal of graffiti is required pursuant to LAMC Section 91.8104.15, which requires that the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley. The City also requires the Applicant to affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS." Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier. The Applicant is responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence. Thus, with adherence to these regulatory codes and compliance measures, impacts related to the general aesthetic appearance, upkeep, and character of the Project Site would be less than significant.

The Proposed Project would be developed and designed to conform to the Los Angeles Municipal Code, the Los Angeles General Plan, the Central City North Community Plan, the Central Industrial Redevelopment Plan, the Los Angeles River Revitalization Master Plan, and other applicable plans and policies that guide development on the Project Site. The Proposed Project's consistency with these required plans and policies are discussed in further detail under Section XI, Land Use and Planning. Therefore, the Proposed Project would comply with the applicable design regulations. The Proposed Project's impacts with regards to architectural design would be less than significant.

Building Height and Massing

The Project Site is immediately surrounded by structures that range between one to seven stories. A seven-story mixed-use residential and commercial building is located immediately adjacent to the west and north of the Project Site. The Ford Motor Company Factory building, located south of the Project Site across 7th Street, is five stories above grade. The live/work residential building to the immediate east is three stories above grade. Other surrounding commercial and industrial buildings range from one to three stories above grade in the surrounding vicinity. The proposed 15-story hotel building would not be out of character with the surrounding Project area. The Project Site is currently located in Height District No. 1, and the Applicant is seeking a height district change to Height District No. 2, which would permit a FAR of 6:1 on-site. Pursuant to LAMC Section 12.21.1, neither the current nor the proposed height district designation limits the height of buildings. Thus, the proposed 15-story building is consistent with the applicable design guidelines. Accordingly, with approval of the height district change, the Proposed Project would be consistent with the height and FAR limitations, and a less than significant impact would occur with respect to the Proposed Project's height.

With regard to the Proposed Project’s massing, the Proposed Project utilizes multiple materials that would visually break up the building’s massing. The fourth floor would include a step-back to incorporate a podium deck. Additionally, amenity space would be located on the fourth floor and roof level. These spaces would include a spa deck, roof lounge, bar, roof garden, cafe, galleries, and observation decks, which would provide views of the Downtown Los Angeles area. The proposed building’s design, architectural materials, and landscaping would serve to visually break up the Proposed Project’s massing. Additionally, the Proposed Project would be designed to comply with applicable design guidelines (as discussed above and in Section XI, Land Use and Planning), which would ensure that the Proposed Project is visually compatible with the surrounding land uses. As such, the Proposed Project would result in a less than significant impact with regards to massing.

Shade/Shadow

Building shadow is a general condition of the urbanized environment, and is considered an aesthetic issue by the City of Los Angeles, which has established shadow impact standards. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These land uses are termed “shadow-sensitive” because sunlight is important to function, physical comfort, or commerce. A shading impact would normally be considered significant if the Proposed Project’s structures cast shadows on a shadow sensitive land use for more than three hours each day between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time between early April and late October.

The Proposed Project would reach a maximum of 172 feet and five inches above grade at the highest point of the roof and 182 feet and five inches at the top of the parapet. The surrounding land uses in the Project vicinity are predominantly mixed-use residential buildings, commercial, and industrial buildings. Based on a review of the surrounding Project area, with the exception of the adjacent mixed-use development to the north and west, the surrounding land uses in the vicinity of the Project Site are not considered sensitive receptors for purposes of determining the Project’s shade and shadow impacts. Many of the surrounding land uses in the Project vicinity are commercial and manufacturing buildings. The adjacent mixed-use development contains outdoor spaces with a pool deck along the western property line on the second level. As such, the remaining portions of the 5-story mixed-use development creates shadows over the second level outdoor terraces, and the Proposed Project would not create new shadows over the outdoor courtyard spaces of the adjacent mixed-use building. Therefore, the Proposed Project’s shade and shadow impacts would be considered less than significant.

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

Less Than Significant Impact. A significant impact may occur if the project introduces new sources of light or glare on or from the project site which would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The determination of whether the Proposed Project results in a significant

nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of the Proposed Project sources; and (b) the extent to which Proposed Project lighting would spill off the Project Site and affect adjacent light-sensitive areas.

Light

Lighting for the Proposed Project would be provided in order to illuminate the building entrances, common open space areas, and parking areas largely to provide adequate nighttime visibility for patrons, guests, and visitors and to provide a measure of security. All outdoor lighting would be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way. To ensure that lighting sources are not directly visible by adjacent properties, the Proposed Project's lighting fixtures would be installed and operated in accordance with Section 99.12.508 – Table A5-602 (Light Pollution Reduction) of the City of Los Angeles Green Building Code (which requires outdoor lighting systems to be designed and installed to comply with the minimum requirements in the California Energy Code, or comply with a local ordinance, whichever is more stringent). The Proposed Project would not generate a substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses.

Current vehicular access to the Project Site is provided by one driveway along Santa Fe Avenue that connects to the surface parking lot. The Proposed Project would not provide parking on-site. A valet drop-off zone would be located along Santa Fe Avenue, adjacent to the Project Site. Due to the lack of parking on-site, vehicular access would not direct vehicular headlights towards the properties surrounding the Project Site. However, a moderate degree of illumination already exists in the Project vicinity in the form of streetlights, building lighting, and car headlights along 7th Street and Santa Fe Avenue. Vehicles leaving the Project Site would not substantially increase light in the Project area. Therefore, headlights from vehicles entering or exiting the valet-parking zone along Santa Fe Avenue would not adversely impact surrounding land uses. The Proposed Project would not introduce any new sources of substantial light that are incompatible with the surrounding area. Thus, with code compliance, the Proposed Project would not generate a substantial increase in ambient lighting, as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses. The Proposed Project's impacts related to lighting would be less than significant.

Glare

Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Proposed Project would not introduce any new substantial sources of glare that are incompatible with the surrounding area. Additionally, as discussed above, the Proposed Project would not substantially increase light in the Project area that may contribute to glare. The Proposed Project is located in a highly urbanized and developed area, and the Proposed Project's architectural materials and landscaping would prevent unnecessary glare. The Proposed Project's landscaped courtyards and green areas would serve to reduce the building's

heat gain and reflective glare potential. Therefore, the Proposed Project's potential impacts related to glare would be at a less than significant level.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would result in an intensification of existing prevailing land uses within the Central City North Community in the City of Los Angeles. Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, some of the related projects would be subject to site plan review by the Los Angeles Department of City Planning for review and approval, as may be applicable. The site plan review process would ensure each project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. Therefore, cumulative aesthetic impacts would be less than significant.

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.

| | 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"/> |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| 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 portion of the Project Site proposed to be developed with the Proposed Project is currently occupied by a three-story hotel building and paved surface parking. The Project Site is also located in an urbanized area of the City of Los Angeles. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the “Los Angeles County Important Farmland 2016” map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.⁵ Therefore, no impact to agricultural lands would occur.

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

No Impact. The Project Site is located within the jurisdiction of the City of Los Angeles and is, therefore, subject to the applicable land use and zoning requirements in the Los Angeles Municipal Code (LAMC). The Project Site is zoned M3-1-RIO with a General Plan land use designation of Heavy Industrial. The Project Site is not zoned for agricultural production, and

⁵ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed April 2019.*

there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.⁶ Therefore, no impact would occur.

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. The Project Site is zoned M3-1-RIO and has a land use designation of Heavy Industrial in the Central City North Community Plan. The Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

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

No Impact. The portion of the Project Site proposed to be developed with the Proposed Project is occupied by a three-story hotel building and surface parking. The Project Site is also located in an urbanized area of the City of Los Angeles. No forested lands or natural vegetation exist on or in the vicinity of the Project Site. Therefore, no impact would occur.

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. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any “Farmland” category designated by the State of California. According to the “Los Angeles County Important Farmland 2016” map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impact would occur.

Cumulative Impacts

No Impact. Development of the Proposed Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The Los Angeles County Important Farmland 2016 Map maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.⁷ The Project Site is located in an urbanized area in the Central City North Community within the City of Los Angeles and does not include any State-designated agricultural lands or forest or timberland uses. Therefore, no cumulative impact would occur.

⁶ *Williamson Act Program, California Division of Land Resource Protection, State of California Williamson Act Contract Land Map 2015-2016, website https://www.dropbox.com/s/ei7sr78xb4cwii2/LA_15_16_WA.pdf?dl=0, accessed April 2019.*

⁷ *Ibid.*

III. Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

| | 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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?

Less Than Significant Impact. A significant air quality impact could occur if the Proposed Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District (SCAQMD) on March 3, 2017 (“2016 AQMP”). The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gasses and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy. In addition, the Southern California Association of Governments (SCAG) approved its 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the 2016 AQMP. The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and State Implementation Plan (SIP) for the South Coast Air Basin (“Basin”), are based on SCAG’s 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). For purposes of assessing

a project's consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP.⁸

As discussed in Section XIV(a), Population and Housing, the Proposed Project is consistent with the regional growth projections for the Los Angeles Subregion and is consistent with the smart growth policies of the 2020-2045 RTP/SCS (also known as the Connect SoCal plan) to increase commercial uses within close proximity to High-Quality Transit Areas (HQTA). An HQTA is defined as a generally walkable transit village or corridor within one half-mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Proposed Project would concentrate new development within a half of a mile (walking distance) of several Metro and Montebello Bus lines that connect to regions of the Los Angeles area. Specifically, a total of four bus lines serve the Project Site, including Metro Local lines Metro Local lines 18, 60, 62; and Metro Rapid Line 720. These bus lines have stops located within convenient walking distance of the Project Site along 6th Street, 7th Street, Santa Fe Avenue, and other nearby streets. Thus, the Project Site's location provides opportunities for employees and patrons to use public transit to reduce vehicle trips. Reports by the California Department of Transportation and SCAG have found that focusing development in areas served by transit can result in local, regional and statewide benefits including reduced air pollution and energy consumption.^{9,10} As such, the Proposed Project's close proximity to other commercial/retail land uses and regional transit would result in fewer trips and a reduction to the Proposed Project's VMTs as compared to the base trip rates for similar stand-alone land uses that are not located in close proximity to transit. Thus, because the Proposed Project would be consistent with the growth projections and regional land use planning policies of the 2016 RTP/SCS and the Connect SoCal plan (2020-2045 RTP/SCS), as detailed in Section XIV(a), Population and Housing, and Section VIII, Greenhouse Gas Emissions, the Proposed Project would not conflict with or obstruct implementation of the 2016 AQMP, and Project impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in State non-attainment for ozone, PM₁₀ and PM_{2.5}, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to

⁸ *In September 2020, SCAG and CARB have since adopted a new 2020 RTP/SCS, now called Connect SoCal. Connect SoCal was determined to conform to the federally-mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. The SCAQMD is currently working on a 2022 AQMP, which will base its analysis from Connect SoCal.*

⁹ *California Department of Transportation, California Transportation Plan 2040, June, 2016, website: <http://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/finalctp2040-report-webready.pdf>, accessed April 2019.*

¹⁰ *Southern California Association of Governments, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, April 2016.*

determining the significance of a project's contribution of emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific impacts. Thus, a project may result in a significant impact in cases where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment.

Proposed Project Increase in Criteria Pollutants

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 18 months, with a final buildout year in 2024. This construction schedule is conservative and yields the maximum daily impacts. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition and site clearing; (2) grading, excavation, and foundations; (3) building construction; and (4) architectural coatings and finishings. The building construction phase includes the construction of the proposed building, connection of utilities to the building, and landscaping the Project Site. Construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving foundation preparation would primarily generate PM_{2.5} and PM₁₀ emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of Reactive Organic Gases (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

For purposes of this analysis, the following regulatory compliance measures have been identified as being applicable to the Proposed Project's construction activities:

- Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
 - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
 - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.

- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering, or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.
- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

The Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (*CalEEMod Version 2016.3.2*) as recommended by the SCAQMD. Table 4.1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project construction. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development.

As shown in Table 4.1, construction-related daily emissions associated with the Proposed Project would be below the peak daily regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, construction impacts are considered to be less than significant.

Operational Emissions

The Project Site is currently developed with a vacant three-story hotel building and surface parking lot. Since the existing structure is currently vacant, it is assumed that the Project Site is currently not generating any existing air pollutant emissions.

The Proposed Project would result in the addition of one story to the existing three-story 14,910 square foot hotel building and the development of a 15-story hotel building with 103 guest rooms and approximately 15,907 square feet of commercial space comprised of art gallery, café, restaurant, and bar uses. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities of the Proposed Project. Area source emissions would be generated by the consumption of natural gas and landscape maintenance.

Mobile emissions would be generated by the motor vehicles traveling to and from the Project Site.

**Table 4.1
Estimated Peak Daily Construction Emissions**

| Emission Source | Emissions in Pounds per Day | | | | | |
|--|-----------------------------|-----------------|--------------|-----------------|------------------|-------------------|
| | ROG | NO _x | CO | SO ₂ | PM ₁₀ | PM _{2.5} |
| Demolition/Site Clearing | | | | | | |
| On-Site Fugitive Dust | -- | -- | -- | -- | 0.11 | 0.02 |
| On-Site Off-Road Diesel Equipment | 0.94 | 8.67 | 9.26 | 0.01 | 0.49 | 0.47 |
| Off-Site Hauling/Vendor/Worker Trips | 0.07 | 0.29 | 0.54 | <0.01 | 0.17 | 0.05 |
| Total Emissions | 1.01 | 8.96 | 9.80 | 0.01 | 0.77 | 0.54 |
| SCAQMD Thresholds | 75 | 100 | 550 | 150 | 150 | 55 |
| Significant Impact? | No | No | No | No | No | No |
| Grading/Excavation | | | | | | |
| On-Site Fugitive Dust | -- | -- | -- | -- | 0.34 | 0.19 |
| On-Site Off-Road Diesel Equipment | 1.25 | 13.18 | 9.34 | 0.02 | 0.60 | 0.56 |
| Off-Site Hauling/Vendor/Worker Trips | 0.14 | 2.79 | 1.10 | <0.01 | 0.37 | 0.11 |
| Total Emissions | 1.39 | 15.97 | 10.44 | 0.02 | 1.31 | 0.86 |
| SCAQMD Thresholds | 75 | 100 | 550 | 150 | 150 | 55 |
| Significant Impact? | No | No | No | No | No | No |
| Building Construction | | | | | | |
| On-Site Off-Road Diesel Equipment | 1.13 | 11.26 | 11.10 | 0.02 | 0.58 | 0.55 |
| Off-Site Hauling/Vendor/Worker Trips | 0.16 | 1.13 | 1.30 | <0.01 | 0.39 | 0.11 |
| Total Emissions | 1.29 | 12.39 | 12.40 | 0.02 | 0.97 | 0.66 |
| SCAQMD Thresholds | 75 | 100 | 550 | 150 | 150 | 55 |
| Significant Impact? | No | No | No | No | No | No |
| Architectural Coating | | | | | | |
| On-Site Architectural Coating | 9.64 | -- | -- | -- | 0.00 | 0.00 |
| On-Site Off-Road Diesel Equipment | 1.09 | 8.16 | 11.26 | 0.02 | 0.43 | 0.43 |
| Off-Site Hauling/Vendor/Worker Trips | 0.03 | 0.02 | 0.21 | <0.01 | 0.07 | 0.02 |
| Total Emissions | 10.76 | 8.18 | 11.47 | 0.02 | 0.50 | 0.45 |
| SCAQMD Thresholds | 75 | 100 | 550 | 150 | 150 | 55 |
| Significant Impact? | No | No | No | No | No | No |
| <i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.</i> | | | | | | |

The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod (Version 2016.3.2). The results of these calculations are presented in Table 4.2, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Proposed Project would not exceed the daily regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

As discussed above, the Proposed Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. Therefore, the Proposed Project would not generate a cumulatively considerable increase in

emissions of the pollutants for which the Basin is in non-attainment, and impacts would be less than significant.

**Table 4.2
Proposed Project Estimated Daily Operational Emissions**

| Emissions Source | Emissions in Pounds per Day | | | | | |
|---|-----------------------------|-----------------|--------------|-----------------|------------------|-------------------|
| | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Summertime (Smog Season) Emissions | | | | | | |
| Area Sources | 1.51 | <0.01 | 0.01 | 0.00 | <0.01 | <0.01 |
| Energy Sources | 0.05 | 0.44 | 0.37 | <0.01 | 0.03 | 0.03 |
| Mobile Sources | 0.66 | 2.91 | 7.67 | 0.03 | 2.62 | 0.71 |
| Stationary Sources | 0.82 | 3.67 | 2.09 | <0.01 | 0.12 | 0.12 |
| Total Project Emissions: | 3.04 | 7.02 | 10.14 | 0.03 | 2.77 | 0.86 |
| SCAQMD Thresholds | 55 | 55 | 550 | 150 | 150 | 55 |
| Potentially Significant Impact? | No | No | No | No | No | No |
| Wintertime (Non-Smog Season) Emissions | | | | | | |
| Area Sources | 1.51 | <0.01 | 0.01 | 0.00 | <0.01 | <0.01 |
| Energy Sources | 0.05 | 0.44 | 0.37 | <0.01 | 0.03 | 0.03 |
| Mobile Sources | 0.62 | 2.95 | 7.24 | 0.03 | 2.62 | 0.71 |
| Stationary Sources | 0.82 | 3.67 | 2.09 | <0.01 | 0.12 | 0.12 |
| Total Project Emissions: | 3.00 | 7.06 | 9.71 | 0.03 | 2.77 | 0.86 |
| SCAQMD Thresholds | 55 | 55 | 550 | 150 | 150 | 55 |
| Potentially Significant Impact? | No | No | No | No | No | No |
| <i>Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.</i> | | | | | | |

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, child care centers, and athletic facilities.¹¹

Localized Significance Thresholds

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the “Final Localized Significance Threshold Methodology”

¹¹ *South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005 website: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>, accessed April 2019.*

document prepared by the SCAQMD,¹² apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). For PM₁₀, the LSTs were derived based on requirements in SCAQMD Rule 403 – Fugitive Dust. For PM_{2.5}, the LSTs were derived based on a general ratio of PM_{2.5} to PM₁₀ for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central Los Angeles County Coastal area. The mass rate look-up tables provide LSTs for one-acre, two-acre, and five-acre sites. Since the Project Site is approximately 0.26 acres, the one-acre LSTs were applied for the Proposed Project. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project are the future multi-family residences located immediately to the north and west of the Project Site and the live/work residential building located to the east of the Project Site, across Santa Fe Avenue. Figure 4.1, below, shows the nearest air quality sensitive receptors to the Project Site. Given the proximity of these sensitive receptors to the Project Site, the LSTs for a one-acre site with receptors located within 25 meters was used to address the potential localized air quality impacts associated with the construction-related NO_x, CO, PM₁₀, and PM_{2.5} emissions for each construction phase.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table 4.3, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate one-acre site in SRA 1. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

¹² *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*



Source: Google Earth, Aerial View, 2019.

**Table 4.3
Localized On-Site Peak Daily Construction Emissions**

| Construction Phase ^a | Total On-site Emissions (Pounds per Day) | | | |
|---|--|------------|------------------|-------------------|
| | NO _x ^b | CO | PM ₁₀ | PM _{2.5} |
| Demolition/Site Clearing | 8.67 | 9.26 | 0.60 | 0.48 |
| Grading/Excavation | 13.18 | 9.34 | 0.94 | 0.75 |
| Building Construction | 11.26 | 11.10 | 0.58 | 0.55 |
| Architectural Coatings | 8.16 | 11.26 | 0.43 | 0.43 |
| SCAQMD Localized Thresholds ^c | 74 | 680 | 5 | 3 |
| <i>Potentially Significant Impact?</i> | <i>No</i> | <i>No</i> | <i>No</i> | <i>No</i> |

^a The localized thresholds for all phases are based on a receptor within a distance of 82 feet (25 meters) in SCAQMD's SRA 1 for a Project Site of one acre.

^b The localized thresholds listed for NO_x takes into consideration the gradual conversion of NO_x to NO₂, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO₂ levels as they are associated with adverse health effects.

^c SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009; Sample Construction Scenarios for Projects Less than Five Acres in Size, Appendix K;
Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.

Localized Operation Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The Basin is currently in attainment for CO emissions, and based on existing ambient CO levels within the Basin, the Proposed Project's mobile source emissions would not exceed the 1-hour or 8-hour CO hotspot concentration threshold for creating a significant impact. This finding is consistent with the AQMD's 2003 AQMP, which modeled localized CO emissions at the four highest traffic volume intersections within the Basin and found the localized emissions to be well below the thresholds of significance for both the 1-hour and 8-hour thresholds. The study intersections included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. The intersection of Wilshire Boulevard and Veteran Avenue, which is located approximately 1.4 miles northwest of the Project Site, was identified as the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.¹³ As reported in the 2016 AQMP, the highest concentrations of CO continued to be recorded in the areas of Los Angeles County, where vehicular traffic is most dense, with the maximum 8-hour and 1-hour concentration (4.3 ppm and 3.0 ppm, respectively) recorded in the South Central Los Angeles County area. Thus, as the Basin is still in attainment for CO, and since ambient CO concentrations in the Basin remain lower than the highest recorded CO concentrations in 2003, it can be concluded that the Proposed Project would not result in a significant localized CO hotspot impact. Therefore, no further analysis for CO hotspots is warranted, and localized operational emissions would be less than significant.

¹³ South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.

Toxic Air Contaminants (TAC)

Construction Emissions

The Proposed Project's construction activities would generate toxic air contaminants (TAC) in the form of diesel particulate matter (DPM) emissions associated with the use of heavy trucks and construction equipment during construction. DPM has no acute exposure factors (i.e., no short-term effects). Therefore, the SCAQMD Handbook does not recommend an analysis of TACs from short-term construction activities, which result in a limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 18 months, the Proposed Project would not result in a long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (18 out of 840 months of a 70-year lifetime), health risks associated with DPM emissions during construction would be less than significant. Moreover, the Proposed Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location. In addition, as discussed above, the Proposed Project would not result in a localized significant impact. Therefore, the Proposed Project would result in a less than significant impact related to construction TACs.

Operational Emissions

The Proposed Project consists of a hotel development. These uses would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. As such, no significant toxic airborne emissions would result from Proposed Project implementation. In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills.

During construction, potential sources that may emit odors during construction activities include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rule 1108 and 1113 limits the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project would control

objectionable construction odors. Therefore, impacts from potential objectionable odors during construction would be less than significant.

The Proposed Project does not include any of the uses identified by the SCAQMD as being associated with odors, such as agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, or fiberglass molding. As the Proposed Project involves no elements related to these types of activities, no odors from these types of uses are anticipated. Odors from garbage chutes and enclosed refuse containers would be controlled through standard best management practices and ongoing building maintenance procedures. While restaurant-related uses have the potential to generate odors from cooking and disposal of organic waste, restaurant operators would be subject to SCAQMD Rule 1138, which requires the installation of odor-reducing equipment. Garbage collection areas for the Project Site would have the potential to generate foul odors if the areas are located in close proximity to habitable areas. The commercial trash collection areas would be enclosed and would not be located near any habitable areas. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Proposed Project's long-term operations phase. Further, the Proposed Project would be required to install odor-reducing equipment in accordance with SCAQMD Rule 1138 to control odors from any operational activities within the proposed commercial uses. With compliance with SCAQMD Rules 402 and 1138, described above, potential objectionable odor impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects in the Project Site vicinity would result in an increase in construction and operational emissions in an already urbanized area of the City of Los Angeles.

Cumulative development can affect the implementation of the 2016 AQMP. The 2016 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2016 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2016 AQMP will not be obstructed by such growth, and cumulative impacts would be less than significant. Since the Proposed Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2016 AQMP would be less than significant.

Cumulative air quality impacts from construction and operation of the Proposed Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds

for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in response to Checklist Question III (c) above, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Proposed Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rules 402 (Nuisance) and Rule 1138 (Odor Reducing Equipment) would regulate any objectionable odor impacts from the related projects and the Proposed Project's long-term operations. Thus, cumulative odor impacts would be less than significant.

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 type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| 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 type="checkbox"/> | <input checked="" 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. A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern under state or federal plans, policies or regulations; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is currently developed with a hotel building and paved surface parking and does not support 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 Game or U.S. Fish and Wildlife Service. Therefore, the Proposed Project would not have a direct adverse effect on any species identified as a candidate, sensitive, or special status species. Additionally, the Project Site does not contain any critical habitat of any sensitive species. No vegetation was observed on the Project Site nor in the public right-of-way along Santa Fe Avenue or 7th Street. Since the Project Site does not contain any vegetation, the Proposed Project would have no impact upon habitat modification.

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. A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alteration of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species. The Project Site is currently occupied

by a three-story hotel building and paved surface parking. No riparian or other sensitive natural community is located on or adjacent to the Project Site. Therefore, implementation of the Proposed Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities, and no impact would occur.

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. A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. The Project Site is entirely developed and covered with impermeable surfaces and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (See Section 4(b), above) and no impacts to riparian or wetland habitats would occur with implementation of the Proposed Project.

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?

No Impact. A project would normally have a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is currently occupied by a three-story hotel building and would involve the addition of one story to the existing three-story building and the construction, use, and maintenance of a 15-story hotel building with 103 guest rooms and approximately 15,907 square feet of commercial space comprised of art gallery, café, restaurant, and bar uses. No vegetation was observed on the Project Site or on the public right-of-way along Santa Fe Avenue and 7th Street. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Proposed Project vicinity. Therefore, the Proposed Project would not interfere with the movement of any resident or migratory fish or wildlife species or wildlife corridors or impede native wildlife nursery sites, and no impacts would occur with respect to the Proposed Project.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. As stated above, the Project Site is currently developed with a three-story hotel building and surface parking. There are no trees on-site or on the public right-of-way. Therefore, the Proposed Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. As such, the Proposed Project would not conflict with a policy or ordinance protecting biological resources, and no impact would occur.

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. A significant impact would occur if the proposed project would be inconsistent with mapping or policies in any conservation plans of the types cited. 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. Therefore, no impact would occur with implementation of the Proposed Project.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project would have a less than significant impact upon biological resources with regulatory compliance. Development of the Proposed Project in combination with related projects would not significantly impact wildlife corridors or habitat for any endangered, threatened, rare, protected, candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFW or the USFWS as no such habitat occurs in the vicinity of the Project Site due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance, Federal Migratory Bird Treaty Act, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, and the City of Los Angeles Protected Tree Ordinance and any other mitigation measures or regulatory compliance measures applicable to each project site. Thus, cumulative impacts to biological resources would be considered less than significant.

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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The following section summarizes and incorporates by reference information from the Historic Resource Technical Report, Rendon Hotel, Los Angeles, California, dated March 2019, prepared by GPA Consulting, (“Historic Report”). The Historic Report is included as Appendix B to this IS/MND.

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

Less Than Significant Impact. A significant impact may occur if the Proposed Project would result in a substantial adverse change in the significance of a historic resource. The Project Site is developed with a three-story hotel building and surface parking lot. The Proposed Project involves rehabilitating the existing building and constructing a new 15-story addition to the north. The purpose of the Historic Report was to determine if the Proposed Project in the Central City North Community Plan Area of the City of Los Angeles would impact any historical resources. The results and findings of the Historic Report are presented below.

Historical Resources in the Study Area

GPA Consulting identified two listed historical resources in the Project study area: the Ford Motor Company Factory building, and the Seventh Street Bridge. Listed historical resources are defined as properties that are listed under national, state, or local landmark or historic district programs.

The Ford Motor Company Factory building was completed in 1914 as a manufacturing plant for Ford Model T automobiles. The five-story building was the second Ford Motor plant built west of the Mississippi. The building is located at 2046-60 East 7th Street to the south of the Project Site. It was formally determined eligible for listing in the National Register in 2014 as part of a Part 1 Tax Credit Certification and is listed in the California Register.

The Seventh Street Bridge was originally constructed in 1910 and modified in 1927 with a new road deck by architects Lange & Bergstrom and Engineer of Bridges and Structures for the City of Los Angeles, Merrill Butler. The bridge spans the Los Angeles River at East 7th Street between S. Santa Fe Avenue and S. Myers Street to the southeast of the Project site. It was formally determined eligible for listing in the National Register and is listed in the California Register. It is designated as an HCM for its association with Los Angeles’ monumental bridge building program. It is also significant as an excellent example of a Beaux Arts-style monumental bridge and the work of master designer Merrill Butler.

Description and History of the Project Site

There is one building and a surface parking lot located on the Project Site. The building was constructed in 1914 as a hotel, and originally had four commercial storefronts on the ground floor and 44 hotel rooms with communal bathrooms above. It was designed by Frank M. Tyler for owner Ed Halbriter. The surface parking lot appears to have previously had an ancillary building located in the northwest corner that has since been demolished.

The parcel is rectangular in plan. The building is sited on the south portion of the parcel, along the south, east, and west property lines, and faces south onto East 7th Street. It directly abuts the sidewalk to the south and east. The surface parking lot is located to the north and is surrounded by a metal chain-link fence. It is accessible via a swinging gate on South Santa Fe Avenue.

The building is three stories in height, and generally rectangular in plan with a central lightwell at the second and third stories that extends from the center of the building to the north. It has a flat roof covered in rolled asphalt that is surrounded by a concrete parapet with a pipe metal railing. The south elevation facing East 7th Street and the east elevation facing South Santa Fe Avenue are clad in buff-colored brick, and the north and west elevations are constructed of common red brick. The main entrance is located at the center bay of the south elevation. It features an arched brick door surround with a single, partially-glazed metal slab door that is covered by a metal security gate. The main entrance is flanked by two storefronts to the east and two storefronts to the west. The easternmost storefront is setback on the southeast corner. It features a fixed plate glass and transom windows atop a ceramic tile bulkhead and a metal slab door covered by a metal security gate. The remaining storefronts have been infilled or are covered with plywood. The storefront immediately to the west is covered by a metal security gate. There is one secondary entrance located on the east elevation and four on the north elevation facing the surface parking lot. The entrance on the east elevation is a partially-glazed wood door covered by a metal security gate. The entrances on the north elevation all consist of metal slab doors. The window openings on the south and east elevations are rectangular with brick lintels and sills, and the window openings on the north and west elevations are generally arched. The window sashes vary throughout, and generally consist of vinyl sliding sashes, wood double-hung sashes, or metal multi-light sashes. There are metal fire escapes on the north, south, and east elevations. There are metal slab doors at four of the arched openings along the north elevation fire escape.

The parcel and surrounding area was originally developed as a vineyard operated by Jean-Louis Vignes in the mid-to-late-nineteenth century and remained primarily agricultural until the 1870s. The area was later subdivided in 1887 as part of the Wingerter Tract. By 1906, the area was moderately developed with a mix of one and two-story residential, commercial, and industrial buildings. The Project Site appears to have been developed at this time with a one-story saloon that was located at the corner of East 7th Street and South Santa Fe Avenue. The saloon was also owned by Ed Halbriter and likely demolished in 1914 when the existing building on the Project Site was constructed. In the 1920s and 1930s, many of the residential and commercial buildings surrounding the Project Site were demolished and new low-rise industrial buildings were constructed. By 1950, the area was primarily industrial, with a few commercial and residential buildings remaining on East 7th Street and Imperial Street.

The first entry in the Los Angeles city directories for the existing building on the Project Site is in 1916, where it is noted as the Colby Hotel with the address 2055 ½ East 7th Street. Other commercial tenants of the building at this time include Pelton & Nelson, a saloon, J.S. Alexander, a cigar and tobacco shop, a cafeteria owned by Mrs. Ida J. Montgomery, and an automobile accessories shop owned by R. S. Shrader. In 1918, there is an entry for furnished rooms at 2055 ½ East 7th Street, which were operated at the time by Mrs. Ada Rendon. The 1920 United States Federal Census indicates that the residents of the hotel during this period were mostly white, working-class men born elsewhere in the United States or in Canada. By 1927, the building is noted as the location of the Rendon Hotel. The 1930 Federal Census indicates that the residents during this period were still mostly white, working-class men. The majority were born elsewhere in the United States, although a larger portion were born outside

the United States. The Historic Report concluded that there are no historical resources on the Project Site.

Project Impacts

The Applicant proposes to rehabilitate the existing building on the Project Site and construct a new addition to the north. The Proposed Project would involve the demolition of the rear stair on the north elevation of the existing building and the surface parking lot. The maximum building height for the new addition would be approximately 182 feet and five inches above grade at the top of the parapet or 15 stories with one subterranean floor. The ground-floor of the existing building would be reconfigured into a hotel café and gallery. The existing easternmost commercial tenant space would remain as well as the existing circulation stair. The second and third floors of the existing building would be reconfigured into hotel offices and guest rooms, and the roof would be converted into an occupiable space for a hotel bar and lounge. The ground floor of the new 15-story addition would be used as a hotel lobby. Hotel rooms would be located on the 2nd through 12th floors and a restaurant would be located on the 13th and 14th floors. The roof of the new addition would be used as a hotel bar, lounge, and spa. The subterranean floor would be used for back-of-house and mechanical space.

The Proposed Project would have no direct impacts on historical resources. There are no historical resources on the Project Site and no historical resources would be demolished, destroyed, relocated, or altered as a result of the Proposed Project. Therefore, the Historic Resources Report only analyzes the potential for the Proposed Project to result in indirect impacts on the historical resources in the vicinity. Indirect impacts or secondary effects are reasonably foreseeable and caused by a project but occur at a different time or place. As described above, there are two listed historical resources in the study area: the Ford Motor Company Factory building and the Seventh Street Bridge. The Ford Motor Company Factory building is located to the south of the Project Site on the south side of East 7th Street. The Seventh Street Bridge is located to the southwest of the Project Site.

In determining the potential impact of adjacent new construction on the historical resources in the study area, the central question is whether the new building would cause a "material impairment" to the significance of the nearby historical resources. Material impairment occurs where a project demolishes or alters the physical characteristics that convey the significance of a historical resource and that justify its inclusion in or eligibility of inclusion in national, state, or local landmark or historic district programs. Such an effect would only occur if the historical resources in the study area no longer retained sufficient integrity to convey their significance.

According to National Register Bulletin #15, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. The Proposed Project would not have any impact on the identified historical resources' physical characteristics that convey their historic significance and justify their inclusion in, or eligibility for, applicable landmark designation programs. Because the Proposed Project would not alter physical characteristics of the historical resources, the only relevant aspect with respect to the impact of the new addition on these historical resources is setting. Setting refers to the character of the place in which the historical resource is situated within the boundaries of the property as well as the resource's broader surroundings. This analysis considers whether the integrity of setting of the Ford Motor

Company Factory building and Seventh Street Bridge would be so diminished by the new construction that they would no longer qualify as historical resources under national, state, or local landmark programs.

The Project Site is located outside the parcel boundary of the Ford Motor Company Factory building and therefore, would not impact its integrity of immediate setting. The historical resource's broader surroundings, namely its relationship to its surrounding features, has already been altered by demolition and new construction. The Ford Motor Company Factory building was completed in 1914, the same year as the Rendon Hotel. Many of the one- and two-story residential, commercial, and industrial buildings that characterized this area in the early twentieth century have been demolished and replaced with new construction. Buildings constructed in the immediate area after 1914 include: 667 South Santa Fe Avenue (1996); 680 South Santa Fe Avenue (1922); 700 South Santa Fe Avenue (1989); 2014 and 2002 East 7th Street (both 1925); 2027 East 7th Street (1951); and 689 South Mesquit Street (1961). Additionally, a new three-story parking garage was recently constructed to the west of the Ford Motor Company Factory building and a new seven-story mixed-use development is currently being constructed to the northwest. Therefore, the overall integrity of setting has already been diminished by changes to the built environment over time.

The views of the Ford Motor Company Factory building from the surrounding blocks would be minimally obscured as a result of the Proposed Project. The most important views of this historical resource are of its primary, street-facing elevations. The building's elevations facing East 7th Street and South Santa Fe Avenue would not be obscured as a result of the Proposed Project. While the new addition might obscure views of the Ford Motor Company Factory building from the west side of South Santa Fe Avenue, north of East 7th Street, the Ford Motor Company Factory building would continue to be visible from the east side of South Santa Fe Avenue as shown in the renderings of the Proposed Project. Additionally, obscuring the view of the historical resource from the west side of South Santa Fe Avenue would not materially impair its eligibility as a historical resource because it is not a character-defining feature of the resource and is therefore not pertinent to conveying its significance. Overall, the Ford Motor Company Factory building would continue to be visible on southwest corner of East 7th Street and South Santa Fe Avenue and thus would remain a prominent feature in the area.

The Project Site is located outside the boundary of the Seventh Street Bridge and therefore, would not impact its integrity of immediate setting. The historical resource's broader surroundings, namely its relationship to its surrounding features, has already been altered by demolition and new construction. Buildings constructed immediately adjacent to the bridge after 1927 include: 690 Mesquit Street (1960); 689 Mesquit Street (1961); 700 South Santa Fe Avenue (1989); and 2160 East 7th Street (1989). Therefore, the overall integrity of setting has already been diminished by changes to the built environment over time. Furthermore, only a portion of the bridge's approach or apron is located within the boundary of the study area. The apron is a utilitarian feature that consists of asphalt paving bordered by concrete sidewalks located immediately to the west of the bridge span. The bridge's character-defining features, including the length and height of the bridge span as well as its road deck, piers, arches, railings, and lampposts, would not be impacted by the Proposed Project. The bridge's current spatial relationship with the Los Angeles River would also not be impacted. The views of the Seventh Street Bridge from the surrounding blocks, including South Santa Fe Avenue and East

7th Street, would not be obscured as a result of the Proposed Project. It would remain highly visible and continue to be a prominent feature.

In conclusion, while the Proposed Project would introduce a new visual element to the study area, it would not affect the setting of the Ford Motor Company Factory building and the Seventh Street Bridge such that the listing or eligibility of these historical resources would be materially impaired. Because the overall integrity of setting has already been lost by changes to the built environment over time, the integrity of setting of the historical resources cannot be further diminished by new construction. The historical resources would also remain highly visible and continue to be prominent features of the blocks on which they are located. Therefore, the Proposed Project would not result in a substantial adverse change to the immediate surroundings of these historical resources to the degree that they would no longer be eligible for listing under national, state, or local landmark programs.

The Proposed Project would have no direct impacts on historical resources. There are no historical resources on the Project Site and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Proposed Project. Indirect impacts on historical resources were also analyzed. The Proposed Project would have no impact on the historical resources in the study area. The new building would introduce a new visual element to the immediate surroundings of the historical resources; however, the Proposed Project would not result in a substantial adverse change to the integrity of the identified historical resources to the degree that they would no longer be eligible for listing as a historical resource defined by CEQA. No mitigation is required or recommended. Therefore, the Proposed Project would not cause an adverse change in the significance of a historic resource, and a less than significant impact would occur.

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

Less Than Significant With Mitigation Incorporated. A significant impact may occur if grading or excavation activities associated with the Proposed Project would disturb archaeological resources.

The Project Site is currently developed with three vacant industrial buildings and paved surface parking. Thus, the Project Site has been previously disturbed. The Project Site and immediate surrounding areas do not contain any known archaeological resources.¹⁴ The Proposed Project would include excavation and grading to ensure the proper base and slope for the one-level subterranean garage. Thus, there is a potential for the accidental discovery of unknown and unrecorded archaeological materials. Mitigation Measure MM-CR-1 would be implemented to ensure that if any archaeological resources are encountered during construction, impacts to such resources would be mitigated to a less than significant level.

¹⁴ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

Mitigation Measure:

MM-CR-1 Archaeological Resources

- In the unlikely event that archaeological resources are discovered during excavation, grading, or construction activities, contractors would be directed to cease all earthwork activities in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. A project-related significant adverse effect could occur if grading activities associated with the Proposed Project would disturb previously interred human remains. No known human burials have been identified on the Project Site or its vicinity. However, it is possible that unknown human remains could occur, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. Compliance with regulatory compliance measures would ensure that any potential impacts related to the disturbance of unknown human remains would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Proposed Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Proposed Project's impacts to cultural resources concluded that the Proposed Project would have no significant impacts with respect to cultural resources following compliance with regulatory measures. Therefore, the Proposed Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project results in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The Proposed Project would expand an existing hotel use with a new 15-story hotel building on an infill site, which would contribute to the revitalization of the Central City North Community Plan area. Because the existing three-story hotel on the Project Site would remain, this analysis focuses on the effect of the Proposed Project, which is measured as the change between the existing uses that will be rehabilitated in place and the new building to be constructed as part of the Proposed Project. The Proposed Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California’s Energy Efficiency Standards located at Title 24, Part 6, Sections 120.0 to 120.9 and 130.0 to 141.0 of the California Code of Regulations and commonly referred to as “Title 24,” which was established in 1978 in response to a legislative mandate to reduce California’s energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California’s Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2019 Standards will continue to improve upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The effective date of the 2019 Standards is January 1, 2020.¹⁵ The Energy Efficiency Standards are a specific response to the mandates of AB 32, (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, and to pursue

¹⁵ California Energy Commission, 2016 Building Energy Efficiency Standards, website: <https://ww2.energy.ca.gov/2018publications/CEC-400-2018-020/CEC-400-2018-020-CMF.pdf>, accessed April 2019.

California energy policy that energy efficiency is the resource of first choice for meeting California’s energy needs. The Proposed Project includes energy efficiency components to conserve energy, which are detailed below.

Energy Consumption

Construction

Energy would be consumed during the demolition, excavation, and construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction of the Proposed Project would generate an increased demand for electricity use related to the treatment and conveyance of water for dust suppression activities during the excavation and grading phase, and the consumption of gasoline and diesel fuels associated with haul trucks, deliveries, and worker commute trips. Construction activities typically do not require the consumption of natural gas to power equipment or heavy machinery. Construction of the Proposed Project would require the export of asphalt and building debris from the portion of the Project Site proposed to be developed during the demolition and site clearing phases. Additionally, up to 2,500 cubic yards of soil would be exported as a result of the grading for the subterranean level. Construction worker travel to and from the Project Site would result in the additional consumption of vehicular unleaded gasoline fuel during the construction period.

The total electricity, gasoline and diesel fuel anticipated to be used during construction is summarized in Table 4.4, Summary of Energy Usage During Construction, below. As shown, construction of the Proposed Project would consume approximately 504 kWh of electricity, approximately 24,576 gallons of diesel fuel and 4,436 gallons of gasoline during construction.¹⁶

**Table 4.4
Construction Energy Use**

| Fuel Type | Quantity |
|---|----------------------|
| Electricity | 504 kWh ^a |
| Gasoline | 4,436 gallons |
| Diesel | 24,576 gallons |
| <i>Notes:</i> ^a kWh = Kilowatt-hour Source: Parker Environmental Consultants, 2020. Calculation worksheets are provided in Appendix C to this IS/MND. | |

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. Further, compliance with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle excessively when not in use (AQMD Rule 403), and meeting specified fuel and fuel additive requirements and emission standards (C.C.R. Title 13,

¹⁶ Refer to Energy Consumption Worksheets included as Appendix C in this IS/MND.

Sec. 2485), would further serve to increase energy efficiency and reduce consumption of fossil fuels. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient or unnecessary consumption of energy. Accordingly, energy demands during construction would be less than significant.

The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes that would occur as an indirect result of the Project. Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to Project construction and operation is expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

Operation

Electricity

Because the existing hotel use on the Project Site would remain, this analysis focuses on the effect of the Proposed Project, which is measured as the net addition of the new hotel building to be constructed as part of the Proposed Project. As shown in Table 4.5, below, the estimated net increase in electricity consumption by the Proposed Project would be approximately 512,522 kWh per year. As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the *L.A. Green Building Code* requires projects to achieve a 20 percent reduction in wastewater generation. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project’s energy consumption.

**Table 4.5
Estimated Electricity Consumption by the Proposed Project**

| Land Use | Size | Total Electricity Demand (kWh/year) ^a |
|---|-----------|---|
| Proposed Uses | | |
| Hotel | 103 rooms | 512,522 |
| Total Proposed Project Electricity Demand: | | 512,522 |
| <i>Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour</i> ^a SCAQMD, CalEEMod Version 2016.3.2, See Appendix E to this IS/MND. Source: Parker Environmental Consultants, 2020. | | |

The Proposed Project would include energy efficient lighting fixtures, low-flow water features, and energy efficient mechanical heating and ventilation systems. Additionally, LADWP would confirm the availability of electric service connections for the Proposed Project. Therefore, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of electricity.

Natural Gas

Gas supply available to SoCalGas from California sources averaged 323 million cubic feet (cf)/day in 2017. SoCalGas projects total natural gas demand to decrease at an annual rate of 0.74 percent per year from 2018 to 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, tighter standards created by revised Title 24 Codes and Standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with the natural gas consumption becoming more efficient and decreasing demand, SoCalGas’s projection for natural gas also decreases. Interstate pipeline delivery capability into SoCalGas on any given day is theoretically approximately 6,665 million cf/day based on the Federal Energy Regulatory Commission (FERC) Certificate Capacity or SoCalGas’s estimated physical capacity of upstream pipelines. SoCalGas’s storage fields attain a combined theoretical storage working inventory capacity of 137.1 billion cubic feet; of that, 112.5 billion cubic feet is allocated to residential, small industrial and commercial customers.¹⁷ As shown in Table 4.6, below, the natural gas consumption as a result of the operation of the Proposed Project would result demand approximately 1,621,410 kBTU/year or approximately 1,588,982 cubic feet per month, which would represent a very small fraction of one percent of SoCalGas’s existing natural gas storage capacity and therefore, would be within SoCalGas’s existing natural gas storage capacity of 112.5 billion cubic feet as of 2018.

**Table 4.6
Estimated Natural Gas Consumption by the Proposed Project**

| Land Use | Size | Total Natural Gas Demand (kBTU/yr) ^a | Total Natural Gas Demand (cf/month) ^b |
|---|-----------|---|--|
| Proposed Project | | | |
| Hotel | 103 rooms | 1,621,410 | 1,588,982 |
| Total Proposed Project Natural Gas Demand: | | 1,621,410 | 1,588,982 |
| <i>Notes: sf =square feet; du = dwelling unit</i> ^a SCAQMD, CalEEMod Version 2016.3.2, See Appendix E to this IS/MND. ^b 1kBTU is equivalent to 0.98 cubic feet of natural gas. Source: Parker Environmental Consultants, 2020. | | | |

As discussed above, the Proposed Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Proposed

¹⁷ California Gas and Electric Utilities, 2018 California Gas Report, website: https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf, accessed April 2019.

Project would also be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. For example, energy performance standards in non-residential buildings require natural gas service water heaters to meet a 95% thermal efficiency. The cool roof standards and water conservation features would further reduce demands upon building heating and cooling. Therefore, compliance with Title 24 of the California Administrative Code and the *L.A. Green Building Code* would reduce the Proposed Project's energy consumption. Therefore, the development of the Proposed Project would not cause wasteful, inefficient or unnecessary consumption of natural gas.

Fossil Fuels

Operation of the Proposed Project would generate vehicle trips associated with people driving to the Project Site for work or home and driving to and from work and other destinations throughout the region. Table 4.7, below, shows the estimated amount of gasoline demand from vehicles traveling to and from the Proposed Project. Assuming an average fuel efficiency of 28.35 mpg for gasoline and 6.27 mpg for diesel per Table 7, Statewide Vehicle Fuel Economy Miles Per Gallon of the 2007 California Motor Vehicle Stock Travel and Fuel Forecast (May 2008), it is estimated that the operation of the Proposed Project would generate an increased net demand for approximately 11,211 gallons of diesel and 38,846 gallons of gasoline per year. However, the Proposed Project would include several conservation measures to decrease reliance on fossil fuels, including coal, natural gas, and oil.

The Project Site is located in the Central City North area, which is highly connected to the regional transit network in the Los Angeles area, especially the Downtown Los Angeles area. Public transportation within the Project Site consists primarily of multiple-stop, local-serving bus lines that provide access to shopping, business, and entertainment destinations in the Project vicinity, although some regional/commuter public transit opportunities, including nearby railways, are also present. The bus service in the Project vicinity is operated primarily by the Los Angeles County Metropolitan Transportation Authority ("Metro"). Specifically, a total of four bus lines serve the Project Site, including Metro Local lines 18, 60, 62; and Metro Rapid Line 720. These bus lines have stops located within convenient walking distance of the Project Site along 6th Street, 7th Street, Santa Fe Avenue, and other nearby streets. Additionally, while some bus lines and/or other transit services in the general Project vicinity are considered to be too distant from the Project Site (generally, more than one-quarter mile) to be used directly, these services can be accessed via connections to or transfers from the site-serving lines to provide access for Project visitors, employees, and patrons between the Project Site and the larger regional area. Due to its proximity to the bus lines aforementioned, the Project Site is easily accessible and highly connected with the City of Los Angeles and the greater Los Angeles area.

**Table 4.7
Estimated Transportation Energy Consumption by the Proposed Project**

| | Annual VMTs (miles) ^a | Fuel Rate (mpg) ^b | Total Fuel Demand (gallons/year) |
|---|-------------------------------------|---------------------------------|-------------------------------------|
| Diesel | | | |
| Proposed Project | 70,294 | 6.27 | 11,211 |
| Net Diesel Consumption: | | | 11,211 |
| Gasoline | | | |
| Proposed Project | 1,101,270 | 28.35 | 38,846 |
| Net Gasoline Consumption: | | | 38,846 |
| <i>Notes: VMTs = vehicle miles traveled; mpg = miles per gallon</i> | | | |
| ^a <i>Appendix E, Greenhouse Gas Emissions: Total Annual VMTs from Operational Mobile; It is assumed that 94% of VMTs are associated with gasoline-powered vehicles and 6% of VMTs are associated with diesel-powered vehicles.</i> | | | |
| ^b <i>Source: Table 7, Statewide Vehicle Fuel Economy Miles Per Gallon of the 2007 California Motor Vehicle Stock Travel and Fuel Forecast (May 2008). Parker Environmental Consultants, 2020.</i> | | | |

Additionally, as an infill development, Proposed Project would incorporate a mix of hotel and commercial uses that may include retail, restaurant, and other neighborhood serving commercial. Because of the Project Site's location near transit service, a number of trips would be expected to be transit or walk trips rather than vehicle trips. Some employees and/or visitors would take transit to their destinations, or would walk to destinations nearby. As discussed in the Transportation Assessment (see Appendix G of this IS/MND), some of the trips might be expected to be walk-ins either from the Proposed Project or the surrounding area. Certain adjustments to the trip generation were therefore made, with LADOT approval, to reflect these conditions. Additionally, the Proposed Project would implement a TDM Program consisting of a reduced parking supply, transit subsidies, and an on-street bicycle facility, which would further reduce daily trips and VMT (See Mitigation Measure MM-TR-2). The reduction in vehicle trips and VMT would therefore decrease the Proposed Project's reliance on fossil fuels.

As discussed above, the Proposed Project's demands on electricity, natural gas, and transportation energy would not significantly affect local and regional supplies and infrastructure. Additionally, the Proposed Project would comply with all energy conservation standards applicable to the Proposed Project. Therefore, the Proposed Project would not cause wasteful, inefficient, and unnecessary consumption of energy during the construction and operation, and impacts with respect to energy consumption would be less than significant.

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

Less Than Significant Impact. A significant impact could occur if the Proposed Project has the potential to conflict with or obstruct a state or local plan for renewable energy or energy efficiency. With respect to renewable energy, all of the Proposed Project's energy demands will be served by the City of Los Angeles Department of Water and Power (LADWP). Starting in 2017, the City's Power Integrated Resource Plan (IRP) was expanded into the Power Strategic Long-Term Resource Plan (SLTRP), which will increase the planning horizon, from 20 years,

ending in 2037, through 2050, in order to better align with Statewide greenhouse gas emissions goals and align with Los Angeles' 100% clean energy initiative. The LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year roadmap that guides the LADWP Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and Power System assets that meet the City's future energy needs at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The 2017 SLTRP re-examines and expands its analysis on the 2016 IRP resource cases with updates in line with the latest regulatory framework, and updates to case scenario assumptions that include a 65 percent Renewable Portfolio Standard (RPS), advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification. As the Proposed Project would derive its electricity from the LADWP, the Proposed Project's energy demands will primarily be derived from renewable energy sources.

With respect to energy efficiency, the Proposed Project would be required to comply with the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the Proposed Project will comply with the L.A. Green Building Code requirement that projects comply with the following requirements related to water conservation, and solid waste reduction:

Solid Waste Reduction. L.A. Green Building Code Section 5.408.1 and LAMC Section 66.32 require the construction contractor to obtain an AB 939 Compliance Permit certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the Proposed Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. As such, a 50 percent reduction of a Project's waste stream to the local landfill would reduce methane emissions and thus lower the Project's contribution to global GHG emissions.

Water Conservation. As mandated by the L.A. Green Building Code, the Proposed Project would be required to provide separate submeters for individual leased, rented or other tenant spaces projected to consume more than 100 gallons per day and any building or addition that is projected to consume more than 1,000 gallons per day. Plumbing fixtures would need to comply with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 5.303.2.2 of the Los Angeles Plumbing Code; or (2) comply with the maximum flow rates shown in Table 5.303.2.3 of the Plumbing Code. The Project would also be required to develop a water budget for landscape irrigation use and install automatic irrigation systems with weather or soil moisture-based controllers.

On a project specific level, the Proposed Project includes the following features, which will further reduce energy demands:

1. *Proximity to mass transit:* The Project Site is an infill site located within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less.
2. *In-Fill Smart Growth:* The Proposed Project is located on an existing infill site that is currently developed with a low-rise hotel building and a surface parking lot, which is located in a highly developed area of Los Angeles. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.
3. *Trip Reduction:* The Proposed Project would also provide on-site bicycle parking in bicycle storage spaces pursuant to the City of Los Angeles Bicycle Ordinance (Ord. 185,480). Pursuant to LAMC Section 12.21 A.16, the Proposed Project is required to supply 13 short-term bicycle parking spaces and 13 long-term bicycle parking spaces. The Proposed Project would provide 13 short-term bicycle parking spaces and 13 long-term bicycle parking spaces, for a total of 26 bicycle parking spaces.
4. *Resource Conservation:* As mandated by the *L.A. Green Building Code*, the Proposed Project would be required to meet Title 24 2019 standards and include ENERGY STAR-rated appliances. The Proposed Project would incorporate energy conservation features in the proposed hotel guest rooms such as low-flow water fixtures and energy conservation appliances.

With incorporation of the features identified above, the Proposed Project would not result in any significant environmental effects with respect to renewable energy. The Proposed Project would be required to comply with the 2019 CALGreen Code, 2019 Title 24 standards, and the L.A. Green Building Code standards. Compliance with state and local energy efficiency standards would ensure the Proposed Project meets all applicable energy conservation policies and regulations. As such, the Proposed Project would not conflict with any adopted energy conservation plans, and impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects within the City of Los Angeles would further increase demand for electricity, natural, and fossil fuels.

Electricity

The Proposed Project and related projects would further increase demand for electricity service provided by LADWP. As discussed above, the LADWP's 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Therefore, LADWP anticipates that it can

meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Compliance with Title 24 energy conservation standards, City of Los Angeles Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Cumulative impacts to electricity service would therefore be less than significant.

Natural Gas

Development of the Proposed Project in conjunction with the related projects would further increase regional demands for natural gas resources. As mentioned above, SoCalGas allocated approximately 112.5 billion cubic feet to residential, small industrial and commercial customers. As a public utility provider, SoCalGas continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area and it is anticipated that it would be able to meet the needs of future development within the region. Additionally, compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine SoCalGas' ability to serve each related project. As such, it is anticipated the related projects and the proposed Project would be accommodated by SoCalGas. Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

Fossil Fuels

The Proposed Project and related projects would cumulatively increase the demand for transportation energy. The Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars Program, which would ultimately reduce non-renewable transportation fuel consumption. Additionally, a majority of the related projects are located within a Transit Priority Area, which is defined as being within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. Therefore, the related projects' locations would promote other modes of transportation such as walking, biking, and public transit options. As such, the Proposed Project and future related projects would be expected to cumulatively reduce consumption in transportation energy, and therefore be less than significant.

VII. Geology and Soils

The following section summarizes and incorporates by reference information from the:

- Geotechnical Investigation, Proposed Hotel Development, 2053 East 7th Street, Los Angeles, California, Tract: Wingerter, Lot: 213, prepared by Geocon West, Inc., dated August 1, 2018 (“Geotechnical Investigation”); and
- City of Los Angeles Department of Building and Safety, Soils Report Approval Letter, 2053 E. 7th Street, LOG # 104628, August 16, 2018.

The Geotechnical Investigation and Soils Report Approval Letter are included as Appendix D to this IS/MND.

In 2015, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District (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 the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Proposed Project would have a significant impact related to geology and soils if it would result in any of the following impacts.

| | 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"/> |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|-------------------------------------|
| 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 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? | <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 risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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. A significant impact may occur if a Proposed Project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. The Geotechnical Investigation concluded that the Project Site is not within a state-designated Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards. No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the site during the design life of the Proposed Project is considered low. The closest surface trace of an active fault to the Project Site is the Raymond Fault located approximately 5.7 miles to the north.

The Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Based on these considerations, the Project Site is considered suitable for the construction of the Proposed Project provided that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and

Safety. Sign off from the Department of Building and Safety would ensure that the Proposed Project meets the applicable performance measures. Accordingly, with the design and construction of the Proposed Project in conformance with the California Building Code seismic standards and approval by the Department of Building and Safety, impacts associated with seismic hazards would be less than significant. Therefore, the Proposed Project would not expose people or structures to substantial adverse effects associated with fault rupture, caused in whole or in part by the Proposed Project's exacerbation of the existing environmental conditions. Thus, Proposed Project impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exacerbating existing hazardous environmental conditions by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. As discussed above, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area. However, the nearest earthquake fault, the Raymond Fault is located approximately 5.7 miles to the north. Therefore, the Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. The Geotechnical Investigation concluded that neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development provided the recommendations presented in the Geotechnical Investigation are followed and implemented during design and construction. Additionally, the Proposed Project would be required to comply with current engineering standards, the seismic safety requirements set forth in the Earthquake Regulation of the City of Los Angeles Building Code (LABC), the Los Angeles Municipal Code (LAMC), and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Proposed Project, as it may be subsequently amended or modified. Therefore, with compliance with applicable regulations and implementation of the recommendations in the Geotechnical Investigation and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter would be implemented for the Proposed Project, construction and operation of the Proposed Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to strong seismic ground shaking. Project impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied layers due to rapid increases in pore water

pressure generated by earthquake accelerations. The current standard of practice, as outlined in the “Recommended Procedures for Implementation of DMG Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction in California” and “Special Publication 117A, Guidelines for Evaluating and Mitigating Seismic Hazards in California” requires liquefaction analysis to a depth of 50 feet below the lowest portion of the proposed structure. Liquefaction typically occurs in areas where the soils below the water table are composed of poorly consolidated, fine to medium-grained, primarily sandy soil. In addition to the requisite soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to induce liquefaction.

The Project Site is located in an area identified as not having a potential for liquefaction on the “State of California Seismic Hazard Zones Map for the Los Angeles Quadrangle.” Additionally, according to the County of Los Angeles Seismic Safety Element, the Project Site is not located within an area identified as having a potential for liquefaction. Historically, the high groundwater level beneath the Project Site is at a depth greater than 150 feet beneath the ground surface.

The Project Site is considered to be suitable for the proposed construction from a geotechnical engineering standpoint, provided that the recommendations specified in the Geotechnical Investigation are included in the design and construction of the Proposed Project to the satisfaction of the Department of Building and Safety. The Proposed Project shall also comply with the conditions contained within the Department of Building and Safety’s Geology and Soils Report Approval Letter for the Proposed Project, and as it may be subsequently amended or modified. Therefore, with compliance with the above regulatory compliance measures, impacts associated with the seismic related hazards including liquefaction would be less than significant.

iv) Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. As concluded in the Geotechnical Investigation, the topography at the Project Site is relatively level and the topography in the immediate vicinity slopes gently to the south-southwest. The Project Site is not located within a City of Los Angeles Hillside Grading Area and not within a Hillside Ordinance Area. Additionally, the Project Site is not within an area identified as having a potential for slope instability according to the County of Los Angeles Safety Element. Furthermore, the Project Site and project area is not within an area identified as having a potential for seismic slope instability as designated by the “State of California Seismic Hazard Zones” map. The Geotechnical Investigation stated there are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. As such, the potential for slope stability hazards to adversely affect the Proposed Project is considered low. Therefore, no impact would occur.

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

Less Than Significant Impact. A project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site. Although development of the Proposed Project has the potential

to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Proposed Project is extremely low due to the generally level topography of the Project Site, and the fact that Project Site would be mostly paved-over or built upon so little soil would be exposed. The Project Site would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills and a Storm Water Pollution Prevention Plan (SWPPP), which would be required to be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Further, the Geotechnical Investigation provided recommendations regarding temporary excavations and temporary shorting during construction of the Proposed Project. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. With incorporation of the recommendations provided in the Geotechnical Investigation and compliance with the conditions included in City of Los Angeles Department of Building and Safety's Soils Report Approval Letter, impacts associated with soil erosion and loss of topsoil would be less than significant.

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. A project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the Proposed Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Investigation concluded that the potential hazards associated with liquefaction are low. Lateral spreading and collapse are types of liquefaction-induced ground failures. Since the potential for liquefaction is low, the potential for lateral spreading or collapse on the Project Site are also low. Additionally, as discussed above, the probability of seismically induced landslides occurring on the Project Site is considered low due to the general lack of elevation difference across or adjacent to the Project Site. The Geotechnical Investigation found that the Project Site is not located within an area of known ground subsidence, and there appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the Project Site. With the implementation of Building Code requirements as discussed above in Checklist Question VII (a), the potential for geologic hazards would be less than significant.

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?

No Impact. A significant impact may occur if the Proposed Project is built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper regulatory code compliance, heaving and cracking of both building foundations and slabs-on-grade could result. As discussed in the Geotechnical Investigation, subsurface exploration involved drilling two boreholes to a maximum depth of approximately 45.5 feet below grade. The Geotechnical Investigation concluded that due to the predominantly granular nature of the soils encountered during site exploration, the soil at the proposed subterranean level are considered to be non-expansive. With incorporation of the recommendations provided in the Geotechnical Investigation and compliance with the Building Code requirements, no impact would occur related to expansive soil.

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. This question would apply to the Proposed Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance and treatment system operated by the City of Los Angeles. No septic tanks or alternative disposal systems neither are necessary, nor are they proposed. Thus, no impact would occur.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if grading or excavation activities associated with the Proposed Project were to disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has been previously graded and is currently developed with a three-story hotel and a surface parking lot. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources.¹⁸

This is further supported by correspondence received from the Natural History Museum of Los Angeles County dated May 8, 2019 (contained in Appendix I), which states that no vertebrate fossil localities lie directly within the Project Site boundaries. The entire proposed Project Site area has surficial deposits that consist of younger Quaternary Alluvium, derived as fluvial deposits from the flood plain of the Los Angeles River that currently flows in a concrete channel immediately to the east. These younger Quaternary deposits usually do not contain significant fossil vertebrates, at least in the uppermost layers, but the underlying older Quaternary deposits found at varying depths may well contain significant vertebrate fossils.

¹⁸ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

The closest vertebrate fossil locality from the older Quaternary deposits is LACM 1755, west-northwest of the proposed project area near the intersection of Hill Street and 12th Street, that produced a fossil specimen of horse, *Equus*, at a depth of 43 feet below the street. The next closest vertebrate fossil locality from older Quaternary deposits beneath the younger Quaternary Alluvium is LACM 2032, north-northeast of the proposed project area near the intersection of Mission Road and Daly Street around the Golden State Freeway (I-5), that produced fossil specimens of pond turtle, *Clemmys mamorata*, ground sloth, *Paramylodon harlani*, mastodon, *Mammuthus americanus*, mammoth, *Mammuthus imperator*, horse, *Equus*, and camel, *Camelops*, at a depth of 20-35 feet below the surface. The pond turtle specimens from locality LACM 2032 were figured in the scientific literature by B.H. Brattstrom and A. Sturn (1959. A new species of fossil turtle from the Pliocene of Oregon, with notes on other fossil *Clemmys* from western North America. *Bulletin of the Southern California Academy of Sciences*, 58(2):65-71). At our locality LACM 1023, just north of locality LACM 2032 near the intersection of Workman Street and Alhambra Avenue, excavations for a storm drain recovered fossil specimens of turkey, *Meleagris californicus*, sabre-toothed cat, *Smilodon fatalis*, horse, *Equus*, and deer, *Odocoileus*, at unstated depth. A specimen of the turkey, *Meleagris*, from this locality was published in the scientific literature by D. W. Steadman (1980. A Review of the Osteology and Paleontology of Turkeys (Aves: Meleagridinae). *Contributions in Science, Natural History Museum of Los Angeles County*, 330:131-207).

Shallow excavations in the younger Quaternary Alluvium exposed throughout the proposed Project Site are unlikely to uncover significant fossil vertebrate remains. Deeper excavations in the proposed Project Site that extend down into the older Quaternary sediments, however, may well encounter significant vertebrate fossils. Any substantial excavations in the proposed Project Site, therefore, should be closely monitored to quickly and professionally recover any potential vertebrate fossils without impeding development. Also, sediment samples should be collected and processed to determine the small fossil potential in the proposed Project Site. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

As mentioned above, although no paleontological resources are known to exist on-site, there remains a low potential for unknown paleontological resources to be uncovered during the construction of the 15-story hotel building with one level of subterranean storage space. Implementation of Mitigation Measure MM-GEO-1, detailed below, pertaining to paleontological resources would ensure that any resources found during the construction phase would be handled in accordance with the proper regulations. As such, impacts to paleontological resources would be less than significant with mitigation.

Mitigation Measure:

MM-GEO-1 Paleontological Resources

- If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project

Site. The paleontological deposits would be treated in accordance with federal, State, and local guidelines.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Proposed Project and related projects in the project area. Similar to the Proposed Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement applicable regulatory compliance measures and any required mitigation measures. Furthermore, the analysis of the Proposed Project’s geology and soils impacts concluded that, through the implementation of the Regulatory Compliance Measures recommended above, Proposed Project impacts would be less than significant. Therefore, the Proposed Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Greenhouse gas (GHG) emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. Scientific studies have concluded that there is a direct link between increased emission of GHGs and long-term global temperature. The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), nitrogen trifluoride (NF₃), and water vapor (H₂O). CO₂ is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).

California Global Warming Solutions Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a

scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.¹⁹ The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

In December 2008, CARB approved a Climate Change Scoping Plan. The Climate Change Scoping Plan calls for a "coordinated set of solutions" to address all major categories of GHG emissions. The Initial Scoping Plan in 2008 presented the first economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California's 2020 GHG emissions cap while ensuring progress in all sectors. The coordinated set of policies in the Initial Scoping Plan employed strategies tailored to specific needs, including market-based compliance mechanisms, performance standards, technology requirements, and voluntary reductions. The Initial Scoping Plan also described a conceptual design for a cap-and-trade program that included eventual linkage to other cap-and-trade programs to form a larger regional trading program.

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.²⁰ It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In December 2017, CARB adopted "California's 2017 Climate Change Scoping Plan" that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor's Executive

¹⁹ CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% as the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.

²⁰ Executive Order S-30-15 established three targets: 1) By 2010, reduce GHG emissions to 2000 levels; 2) By 2020, reduce GHG emissions to 1990 levels; 3) By 2020, reduce GHG emissions to 80 percent below 1990 levels. Executive Order B-16-2012 facilitated the commercialization of zero-emission vehicles and reestablished the 2050 target to reduce GHG emissions to 80 percent below 1990 levels.

Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure the State is on a trajectory to meet its mid- and long-term climate goals.

The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California's climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. The 2017 Scoping Plan reflects the direction from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the key existing emissions reductions programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level.

Cap-and-Trade Program

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the greenhouse gas (GHG) emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Additionally, SB 32 established a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap will be able to trade permits (allowances) to emit GHGs.

Cap-and-trade is a market-based regulation that is designed to reduce greenhouse gases (GHGs) from multiple sources. Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur technological innovation and investments in clean energy. The Proposed Project would be exempt from the Cap-and-Trade program, since it only proposes residential uses and does not propose any industrial or high-emitting land uses.

On July 11, 2018, CARB announced that greenhouse gas pollution in California fell below 1990 levels, which was the 2020 greenhouse gas emissions goal set by AB 32.²¹

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. Statewide reductions in GHG emissions from construction is being accomplished through continuous updates to the

²¹ California Air Resources Board, "Climate Pollutants Fall Below 1990 Levels for First Time" <https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time>, accessed April 2019.

CALGreen Code and other State- mandated laws and regulations. The CALGreen Code encourages sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. Originally adopted in 2008, the CALGreen Code included all voluntary standards that went beyond the basic building code requirements and introduced new standards for reducing water use, provisions for reducing and recycling construction and demolition waste, criteria for site development to locate buildings near public transit, and measures for improving indoor air quality to protect the health of building occupants. In 2010, the CALGreen Code became mandatory on a statewide basis.

City of Los Angeles Sustainable City pLAN / L.A.'s Green New Deal

On April 8, 2015, Mayor Eric Garcetti released the City of Los Angeles' first ever Sustainable City pLAN (The pLAN). The pLAN sets the course for a cleaner environment and a stronger economy, with commitment to equity as its foundation. The pLAN is made up of short term (by 2017) and long term (2025 and 2035) targets. The pLAN set out an ambitious vision for cutting greenhouse gas emissions, reducing the impact of climate change and building support for national and global initiatives with targets to achieve a 45% reduction in GHG emissions below 1990 baseline levels by 2025, a 60% reduction by 2035, and an 80% reduction by 2050. The City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles. Since 2015, Mayor Garcetti has released an expanded vision for the Sustainable City pLAN, called L.A.'s Green New Deal. Released in 2019, the update to the Sustainable City pLAN (L.A.'s Green New Deal) sets new energy efficiency and sustainability goals that will transition the City of Los Angeles to a more resilient, sustainable, and equitable energy future. That future will be realized, in part, by the 2050 targets that are spelled out in the plan that include goals for: renewable energy, local water, clean and healthy buildings, housing and development, mobility and public transit, zero emission vehicles, industrial emissions and air quality monitoring, waste and resource recovery, food systems, urban ecosystems and resilience, environmental justice, prosperity and green jobs, and lead by example.

LA Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the *L.A. Green Building Code* requires new development projects to exceed the prescriptive water conservation plumbing fixture requirements of Sections 5.303.2.2 of the California Plumbing Code by 20%, meet the requirements of the California

Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. Projects filed on or after January 1, 2020 must comply with the provisions of the 2020 Los Angeles Green Building Code. New development projects are required to comply with the *L.A. Green Building Code*. Therefore the Project would comply with an adopted plan or regulation that was adopted in part for the purposes of reducing GHG emissions.

Connect SoCal (2020 RTP/SCS)

On September 3, 2020, SCAG’s Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). In 2012, SCAG adopted the region’s first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – a plan that the Regional Council now calls Connect SoCal. On October 30, 2020, through Executive Order G-20-239, CARB accepted SCAG’s 2020 RTP/SCS as a GHG reduction plan.²²

Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Within the Connect SoCal Plan, the 2020 SCS would, when implemented, meet the applicable 2035 GHG emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels. CARB staff’s determination summarizes its assessment, findings, and recommendations relating to the determination on the 2035 target. The Connect SoCal plan lays out a strategy for the region to meet these targets. The Connect SoCal SCS has been found to meet state targets for reducing GHG emissions from cars and light trucks. Connect SoCal achieves per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020, and 19 percent in 2035, thereby meeting the GHG reduction targets established by the ARB for the SCAG region.

As part of the State’s mandate to reduce per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions’ land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. The following strategies are intended to be supportive of implementing the regional SCS: 1) focus growth near destinations and mobility options; 2) promote diverse housing options; 3) leverage technology innovations; 4) support implementation of sustainability policies; and 5) promote a green region.

²² *State of California, Air Resources Board, Executive Order G-20,239, website: <https://scag.ca.gov/sites/main/files/file-attachments/carb-2020-scs-evaluation-packet.pdf?1606337689>, accessed December 2020.*

SCAQMD

In October 2008, SCAQMD staff proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO₂e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds. However, this group has not met since 2010.

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

Less Than Significant Impact. Neither the City, SCAQMD, nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a residential project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a commercial hotel project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence. The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project. The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination. A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The California Supreme Court's decision published on November 30, 2015, in the Center for Biological Diversity v. California Department of Fish and Wildlife (62 Cal.4th 204) (also known as the Newhall Ranch Case) reviewed the methodology used to analyze GHG emissions in CEQA. The California Supreme Court suggested regulatory consistency as one pathway to compliance, by stating that a lead agency might assess consistency with AB 32's goal in whole

or in part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities. The Court stated that a lead agency might assess consistency with AB 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities, including statewide programs and local climate action plans or GHG emissions reduction plans. This approach is consistent with CEQA Guidelines Section 15064, which provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions. Importantly, the Court also suggested: "A lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions (bright line threshold approach) if supported by substantial evidence."

For the Project, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions.

In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2020 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements set forth by the 2008 Scoping Plan and subsequent updates SB 375, SCAG's 2020 RTP/SCS, and the L.A. Green Building Code.

Construction

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the approximate 18-month duration of construction activities.

Emissions of GHGs were calculated using CalEEMod (*Version 2016.3.2*) for each year of construction of the Proposed Project and the results of this analysis are presented in Table 4.8, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table 4.8, the total GHG emissions from construction activities related to the Proposed Project would be approximately 408 metric tons, with the greatest annual emissions occurring in 2022.

Operation

The Project Site is currently developed with a vacant three-story hotel building and surface parking lot. Since the existing structure is currently vacant, it is assumed that the Project Site is currently not generating any existing greenhouse gas emissions.

**Table 4.8
Proposed Project Construction-Related Greenhouse Gas Emissions**

| Year | CO ₂ e Emissions (Metric Tons per Year) ^a |
|--|--|
| 2021 | 168.94 |
| 2022 | 239.02 |
| Total Construction GHG Emissions | 407.96 |
| ^a Construction CO ₂ values were derived using CalEEMod Version 2016.3.2 Calculation data and results are provided in Appendix E, Greenhouse Gas Emissions Worksheets. | |

Project GHG Emissions

The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated under two separate scenarios in order to illustrate the effectiveness of the Proposed Project’s compliance with the *L.A. Green Building Code* and other mitigating features that would be effective in reducing GHG emissions, such as the Project Site being an infill lot, its proximity to transit and walking distance to a major employment center. The Proposed Project’s emissions were calculated using CalEEMod for a base project without the energy conservation measures mandated by the Green Building Code and with GHG reduction measures for purposes of quantifying the net benefit of code compliance measures in terms of a reduction in GHG emissions. As shown in Table 4.9, below, the net increase in GHG emissions generated by the Proposed Project under the Project Without GHG Reduction Measures would be 1,035.01 CO₂e MTY, and the Proposed Project scenario with GHG reduction measures would result in a net increase of 898.90 CO₂e MTY.

For purposes of this comparison it should be noted that the Proposed Project’s structural and operational features such as installing energy efficient lighting, low flow plumbing fixtures, and implementing an operational recycling program during the life of the Proposed Project would reduce the Project’s GHG emissions by approximately 13 percent. Additionally, the Proposed Project is an infill development and is recycling land and reutilizing existing structures, which is encouraged through the state, regional, and local plans and policies (i.e., AB32, SB375, and SCAG’s 2020 RTP/SCS growth strategy). The percent reduction calculated above is not a quantitative threshold of significance, but shows the efficacy of the Proposed Project’s compliance with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State’s GHG reduction targets under SB 32. Nevertheless, the Proposed Project would not exceed the SCAQMD proposed non-industrial screening threshold of 3,000 MTCO₂e/year. While neither SCAQMD nor the City have adopted this screening threshold, the fact the Proposed Project’s GHG emissions are below the threshold provides further substantial evidence that the Proposed Project’s GHG impacts are less than significant.

**Table 4.9
Proposed Project Operational Greenhouse Gas Emissions**

| Emissions Source | Estimated Project Generated CO ₂ e Emissions (Metric Tons per Year) | | |
|-------------------------------------|---|---------------------|-----------------------------------|
| | Base Project Without GHG Reduction Features | Proposed Project | Percent Reduction ^a |
| Area | <0.01 | <0.01 | 0% |
| Energy | 373.08 | 373.08 | 0% |
| Mobile (Motor Vehicles) | 591.04 ^{b,c} | 473.98 | 20% |
| Stationary | 4.59 | 4.59 | 0% |
| Waste | 28.36 | 14.18 | 50% |
| Water | 24.34 | 19.47 | 20% |
| Construction Emissions ^d | 13.60 | 13.60 | -- |
| Total GHG Emissions: | 1,035.01 | 898.90 | 13% |

Notes:
^a The Percent Reduction is not a quantitative threshold of significance, but shows the efficacy of the Project's compliance with the various regulations, plans and policies that have been adopted with the intent of reducing GHG emissions.
^b Based on Proposed Project mobile source GHG emissions excluding Mitigation Measures and reduced VMT.
^c Calculated proportionately based on Proposed Project mobile trips with reductions 494 trips to trips without reductions 616 trips and multiplied with the GHG emissions of 473.98 MTCO₂e.
^d The total construction GHG emissions were amortized over 30 years and added to the operation of the Project. Calculation data and results provided in Appendix E, Greenhouse Gas Emissions Worksheets.

Through required implementation of the Green Building Code, the Project Site's location on an infill site, the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB's SB 32 Scoping Plan aimed at achieving a 40 percent reduction of 1990 GHG emission levels by 2030. The following describes the benefits and applicability of the Proposed Project's compliance measures and design features that serve to reduce the carbon footprint of the development:

Infill Development. The Proposed Project is located on an infill site that is currently developed with vacant hotel land uses. The Proposed Project would include the addition of one story to the existing three-story structure and the construction, use, and maintenance of an attached 15-story hotel with 103 guest rooms and approximately 15,907 square feet of commercial space comprised of art gallery, café, restaurant, and bar uses. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

Energy Conservation. The Project would include the development of a new non-residential building or structure of 50,000 gross square feet or more of floor area. As mandated by the L.A. Green Building Code, the Proposed Project must meet Title 24 2019 standards and include ENERGY-STAR appliances.

Solid Waste Reduction Efforts. L.A. Green Building Code Section 5.408.1 and LAMC Section 66.32 require the construction contractor to obtain an AB 939 Compliance Permit certifying the delivery of the construction and demolition waste to a certified

construction and demolition waste processing facility. Diversion efforts would be accomplished through source reduction, recycling, and composting. Finally, the Proposed Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. As such, a 50 percent reduction of a Project's waste stream to the local landfill would reduce methane emissions and thus lower the Project's contribution to global GHG emissions.

Water Conservation. As mandated by the L.A. Green Building Code, the Proposed Project would be required to provide separate submeters for individual leased, rented or other tenant spaces projected to consume more than 100 gallons per day and any building or addition that is projected to consume more than 1,000 gallons per day. Plumbing fixtures would need to comply with one of the following: (1) a 20% reduction in the building's "water use baseline" as demonstrated in Table 5.303.2.2 of the Los Angeles Plumbing Code; or (2) comply with the maximum flow rates shown in Table 5.303.2.3 of the Plumbing Code. The Project would also be required to develop a water budget for landscape irrigation use and install automatic irrigation systems with weather or soil moisture-based controllers.

In addition to the GHG emission reductions described above, it is important to note that the CO₂e estimates from mobile sources (particularly CO₂, CH₄, and N₂O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing environment. This is a standard approach taken for air quality and greenhouse gas emissions analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the South Coast Air Basin and are new emissions sources, or whether they are sources that were already occurring within the Basin and merely shifted to a new location. Because the effects of GHGs are global in nature, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (commuting, shopping, etc.) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then the new development would result in a potential net reduction in global GHG emissions.

Plan Consistency

Consistency with SB 32 Scoping Plan

While the Scoping Plan provided several board goals and policies aimed at reducing greenhouse gasses on a statewide level, some of the policies are applicable or interrelated to the development of specific land use projects at the local level. Provided below is a consistency

analysis of the Scoping Plan's policies that are directly or indirectly applicable to the Proposed Project.

Energy Efficiency. The Proposed Project would be consistent with the Scoping Plan's policy to (a) maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms, and (b) to pursue comparable investment in energy efficiency from all retail providers of electricity in California. The Proposed Project would be designed and constructed to meet L.A. Green Building Code standards by including several measures designed to reduce energy consumption, including, but not limited to, installing efficient lighting fixtures, low flow plumbing fixtures, and ENERGY-STAR rated appliances.

Renewables Portfolio Standard. The Proposed Project would not impede the Scoping Plan's policy to achieve 33 percent renewable energy mix statewide. While this policy is not directly applicable to the Proposed Project, the Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use of renewable energy to 35%.

Green Building Strategy. The Proposed Project would be consistent with the Scoping Plan's policy to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The Proposed Project would be designed and constructed to meet L.A. Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low-flow plumbing fixtures, and ENERGY-STAR rated appliances.

Recycling and Waste. The Proposed Project would be consistent with the Scoping Plan's policy to reduce methane emissions at landfills, increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling, and to move toward zero waste. The Proposed Project would result in a less than significant impact on landfill capacity (see response to Checklist Question XVIII, below). It would meet the City's 70 percent waste diversion rate goal and comply with the City's Zero Waste Plan, which will reduce solid waste, increase recycling, and manage trash in the City through the year 2030.

Water. The Proposed Project would be consistent with the Scoping Plan's policy to continue efficiency programs and use cleaner energy sources to move and treat water. The Proposed Project would use water-efficient low-flow plumbing fixtures that would reduce the demand for potable water on site. As such, the Proposed Project's conservation efforts would be achieved by complying with the Green Building Code and would further reduce the demands for treating potable water and wastewater.

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use, and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct

the development of the SCS for the region. A discussion of the Proposed Project's consistency with the SCS is provided further below.

Consistency with Connect SoCal

The Proposed Project would be consistent with the following key GHG reduction strategies in SCAG's Connect SoCal (2020 RTP/SCS), which are based on changing the region's land use and travel patterns:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations
- Support implementation of sustainability policies; and
- Promote a green region.

The Proposed Project represents an infill development within an existing urbanized area that would concentrate new commercial uses within a High Quality Transit Area (HQTA). The Proposed Project would provide employees and patrons with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures such as the Project's TDM Program would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's Connect SoCal.

Consistency with L.A. Green Building Code

The L.A. Green Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the L.A. Green Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission, meet 50 percent construction waste recycling levels, provide on-site storage for short- and long-term bicycle parking areas, and provide Energy-Star rated appliances where applicable. The Project would comply with these mandatory measures. Therefore, the Project is consistent with the L.A. Green Building Code.

As demonstrated above, the Proposed Project's design features and compliance with regulatory measures would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, the LA Green Building Code, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

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

Less Than Significant Impact. As described above in response to Checklist Question VIII(a), the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including AB 32, SB 375, the L.A. Green Building Code, and CARB's 2017 Scoping Plan aimed at achieving 40 percent below 1990 GHG emission levels by 2030 and 80% below 1990 levels by 2050. Therefore, the Proposed Project's generation of GHG emissions would not make a project-specific or cumulatively considerable contribution to conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Proposed Project's impact would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Pursuant to the Office of Planning and Research's recently published Discussion Draft on CEQA and Climate Change (December 2018), in determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of a project's emissions to the effects of climate change. It is the increased accumulation of GHG emissions from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above analyzes whether the Proposed Project's impact would be cumulatively considerable using a plan-based approach (and quantitative and qualitative analysis) to determine the Proposed Project's contributing effect on climate change. As concluded above, the Proposed Project's generation of GHG emissions would represent a 13 percent reduction in GHG emissions with GHG reduction measures in place as compared to the Proposed Project's emissions in the absence of all of the GHG reducing measures and project design features. Furthermore, the Proposed Project would be consistent with all applicable local ordinances, regulations, and policies that have been adopted in furtherance of the state and City's goals of reducing GHG emissions. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

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 checked="" type="checkbox"/> | <input 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 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"/> |
| 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 type="checkbox"/> | <input checked="" 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. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Proposed Project includes the construction of a 15-story hotel building with 103 guest rooms and 15,907 square feet of commercial space comprised of art gallery, café, restaurant and bar uses. During the operation of the Proposed Project, no hazardous

materials other than modest amounts of typical cleaning supplies and solvents used for janitorial purposes would routinely be transported to the Project Site. The acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements.

Construction could involve the use of potentially hazardous materials, including vehicle fuels, 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 standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. Therefore, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

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. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to, oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to people from exposure to the health hazard.

Based on the Department of Toxic Substances Control EnviroStor Database, the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste contamination.²³ Therefore, the Proposed Project would not handle, dispose, or store any hazardous materials during the Proposed Project's construction activities. Additionally, the Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes that are typically associated with the operation of the Proposed Project, and the use of these substances would comply with State Health Codes and Regulations.

²³ California, Department of Toxic Substances Search EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed May 2019.

Asbestos-Containing Materials (ACMs) and Lead Based Paint

The EPA banned asbestos-containing materials in 1989, and lead-based paints were banned for use in 1978. The existing building on the Project Site was constructed in 1914. Therefore, some building material such as dry wall, stucco, as well as the sheet roofing and mastic suspected to contain asbestos may have been used in the building.

Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACM are present in the building. If ACM are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as other state and federal regulations. Asbestos removal is stringently controlled by Federal Regulations and SCAQMD Rule 1403. Removal of asbestos in a building is not unusual and can be readily accomplished. In accordance with the EPA's NESHAP regulation and SCAQMD's Rule 1403, all materials that are identified as ACMs would be removed by a trained and licensed asbestos abatement contractor. The asbestos removal operations would be conducted in accordance with CAL-OSHA Asbestos for the Construction Industry Standard, SCAQMD, and EPA rules and regulations and industry standards. The contractor selected for the removal process would be chosen based on experience, reputation, and relationship with local agencies such as SCAQMD and CAL-OSHA regional offices. Generally, asbestos removal operations are low risk. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The SCAQMD has very specific regulations for asbestos emissions. Provided the removal and disposal of ACMs from the Project Site follows the various guidelines required by SCAQMD Rule 1403, as well as all other applicable state and federal rules and regulations, hazardous materials impacts relative to exposure to asbestos would be less than significant.

Prior to the issuance of any permit for demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to CAL-OSHA regulations. If the survey finds lead-based paint, a qualified lead-based paint abatement consultant would be required to comply with applicable state and federal rules and regulations governing lead paint abatement. Such regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). Compliance with mandatory state and federal regulations would ensure that the potential lead-based paint on-site would be handled properly and impacts associated with the exposure to lead-based paint would be less than significant.

In conclusion, the Proposed Project's compliance with mandatory state and federal regulatory compliance measures would ensure that potential impacts associated with the release of a hazardous material would be less than significant.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to, oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard (i.e., such as exposure to lead-based paint, polychlorinated biphenyls, or asbestos). The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design would reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

There is one Los Angeles Unified School District school within one-quarter mile of the Project Site: Metropolitan Continuation High School, located at 727 South Wilson Street, approximately 0.2 miles west of the Project Site. Localized construction impacts associated with noise, dust, and localized air quality emissions, and construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. Since no schools are located within 500 feet from the Project Site, the construction activities from the Proposed Project would not create a hazard to any nearby schools. Further, the proposed haul route exiting the Project Site to Sunshine Canyon Landfill would travel east along 7th Street, and utilize the Breed Street on-ramp and Santa Fe Avenue / Mateo Street off-ramp to and from the I-10 Freeway. As such, the local haul routes would not pass by any nearby schools. Therefore, construction impacts to nearby schools would be less than significant.

Further, no hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for maintenance and janitorial purposes would be present at the Project Site, and the acquisition, use, handling, storage, and disposal of these substances would comply with all applicable federal, state, and local requirements. The operational activities of the Proposed Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Operational impacts on nearby schools would be less than significant.

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 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 from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may

occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The Project Site is not listed in any government database for having hazardous wastes or released hazardous materials.²⁴ Development of the Proposed Project would not create a significant hazard to the public or the environment. Therefore, a less than significant impact would occur.

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. A significant project-related impact may occur if the Proposed Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The closest public airport to the Project Site is the Bob Hope Airport. However, the airport is not located within two miles of the Project Site. Furthermore, the Project Site is not in an airport hazard area. Therefore, no impact would occur.

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

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. The determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences. The Project Site is not located on a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.²⁵ Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.²⁶ Development of the Project Site may require temporary and intermittent partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Proposed Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and a less than significant impact would occur.

²⁴ California, Department of Toxic Substances Search EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed May 2019.

²⁵ Los Angeles County Department of Public Works, City of Los Angeles Central Area Disaster Route Map, August 13, 2008.

²⁶ City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.

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

No Impact. The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).²⁷ Therefore, no impacts from wildland fires are expected to occur.

Cumulative Impacts

Development of the Proposed Project in combination with the related projects identified in Section 3, Project Description, has the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City of Los Angeles. However, the potential impact associated with the Proposed Project would be less than significant with adherence to all applicable regulations and, therefore, would not be cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, state, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, state, and federal laws pertaining to hazardous materials, the Proposed Project in conjunction with related projects would be expected to result in less-than-significant cumulative impacts with respect to hazardous materials.

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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

²⁷ City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), website: <http://zimas.lacity.org>, accessed April 2019.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|-------------------------------------|-------------------------------------|
| 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 checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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. A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include the NPDES permitting system, LAMC Article 4.4, and the low impact development requirements, which reduce potential water quality impacts during the construction and operation of a project, the Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles and Ordinance 173,494.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Proposed Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Prior to issuance of a grading permit, the Applicant will be required to obtain coverage under the SWRCB's NPDES Construction General Permit. Under the Construction General Permit Order 2009-0009-DWQ, dischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be required to be prepared and implemented for the Proposed Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 would ensure that the Proposed Project's construction-related water quality impacts would be less than significant.

Operation

The Project Site is currently developed with a three-story hotel building and surface parking. The Project Site is completely covered with impervious surfaces. Thus, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains located at the intersection of 7th Street and Santa Fe Avenue and does not percolate into the groundwater table beneath the Project Site.²⁸ Following completion of construction, the Proposed Project and the Project Site as a whole would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions and there would not be any increased imperviousness of the Project Site. The Proposed Project's potential impacts to surface water runoff would be reduced to a less than significant level by

²⁸ *City of Los Angeles, Bureau of Engineering, Navigate LA, website: <http://navigatela.lacity.org/navigatela/>, accessed April 2019.*

incorporating stormwater pollution control measures as set forth below that would regulate the amount and water quality of stormwater leaving the Project Site.

In November 2012, the Los Angeles adopted Order No. R4-2012-0175 the NPDES Stormwater Permit for the County of Los Angeles and cities within (NPDES No. CAS004001). The primary objectives of the stormwater program requirements are to: (1) effectively prohibit non-stormwater discharge; and (2) reduce the discharge of pollutants from stormwater conveyance systems to the maximum extent practicable statutory standard.

The Proposed Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City of Los Angeles. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Proposed Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first 3/4-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.²⁹

The Proposed Project falls within the second tier of the LID Ordinance requirements, which states that development projects that involve non-residential uses and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site, the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Proposed Project shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration/bio-treatment systems of all runoff on-site (listed in priority order). Development and redevelopment projects are required to prepare a LID Plan, which complies with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is technically infeasible, the Proposed Project and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance. Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.³⁰

²⁹ *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

³⁰ *Ibid.*

In compliance with the LID ordinance requirements, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City of Los Angeles requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Proposed Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.³¹

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Proposed Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, as the Proposed Project would be subject to the LID requirements and compliance procedures, operational water quality impacts would be less than significant with code compliance.

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

Less Than Significant Impact. A project would normally have a significant impact on groundwater levels if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

As discussed in response to Checklist Question X(a) the Project Site is 100 percent impervious. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Groundwater was not encountered during exploration, conducted to a maximum depth of 45.5 feet below the existing grade. The historically highest groundwater level is at a depth of more

³¹ *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

than 150 feet below the ground surface.³² The Proposed Project would excavate soils beneath the Project Site at approximately 12 feet below grade to allow for the construction of the proposed subterranean storage level. Because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Additionally, adherence to Article 4.4 of the LAMC would ensure that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

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. A project would normally have a significant impact on surface water quality if discharges associated with the project would create substantial erosion, siltation, pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. The Los Angeles River is located approximately 0.15 mile east of the Project Site, and the Project Site is located within the RIO District. The Project Site is located in a highly urbanized area within the City of Los Angeles, and no streams or river courses are located on the Project vicinity. The Proposed Project is an infill development project on a site that is currently fully developed and is entirely impervious. Implementation of the Proposed Project would not increase site runoff or result in any changes in the local drainage patterns, since implementation of the LID Plan would reduce the amount of surface water runoff after storm events. The Proposed Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater).

Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Proposed Project is extremely low due to the generally level topography of the Project Site, and the fact that the Project Site would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills and a Storm Water Pollution Prevention Plan (SWPPP), which would be required to be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Further, the Geotechnical Investigation provided recommendations regarding temporary excavations and temporary shoring during construction of the Proposed Project. All grading activities require grading permits from the Department of

³² *Geocon West, Inc., Geotechnical Investigation, Proposed Hotel Development, 2053 East 7th Street, Los Angeles, California, August 1, 2018 (See Appendix D of this IS/MND).*

Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. The standard conditions imposed by the City of Los Angeles Department of Building and Safety, as specified in the Soils Report Approval Letter, would ensure that impacts to soil erosion and siltation are less than significant levels. Regulatory compliance measures would ensure that runoff leaving the Project Site would not result in substantial erosion or siltation during the construction and operational phases of the Proposed Project. Therefore, impacts to substantial erosion or siltation on- or off-site would be less than significant.

(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. A project would normally have a significant impact on surface water hydrology (and the rate and amount of surface water) if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow or would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. The Project Site is located in a highly urbanized area of Los Angeles, and approximately 950 feet west of the Los Angeles River. The Project Site is nearly 100 percent impervious. Implementation of the Proposed Project would not increase site runoff or result any changes in the local drainage patterns. Implementation of the SWPPP, however, would reduce the amount of surface water runoff after storm events, as the Proposed Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Therefore, the Proposed Project would not increase the rate or amount of flow from the Project Site or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant.

(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. A project would normally have a significant impact on surface water quality if discharges associated with the project would create substantial additional sources of pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level, which exceeds the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if a project substantially increases the probability that polluted runoff would reach the storm drain system.

The Project Site is currently developed, and a majority of the surface water is directed off site to the adjacent storm drain inlets along South Santa Fe Avenue and East 7th Street. Storm water retention will be required as part of the LID/SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of

construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance. Accordingly, the Proposed Project will be required to demonstrate compliance with the LID Ordinance standards and retain or treat the first ¼ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, which will reduce the Proposed Project's impact to the stormwater infrastructure. As discussed above in response to Checklist Question X (b), the Geotechnical Investigation concluded based on conditions encountered at the time of exploration, groundwater is not anticipated during construction of the one subterranean level. Therefore, the Proposed Project would not provide substantial additional sources of polluted runoff, and potential impacts to surface water quality would be less than significant.

iv. Impede or redirect flood flows?

No Impact. A significant impact may occur if the Project Site was located within a 100-year flood zone and would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area.³³ A review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Map No. 06037C1636G, dated December 21, 2018, indicates that the Project Site is located in an area designated as "Zone X", described as "Areas determined to be outside the 0.2 percent flood plain."³⁴ The Project Site is located in a highly urbanized area and, as no changes to the local drainage pattern would occur with implementation of the Proposed Project, the Proposed Project would not have the potential to impede or redirect floodwater flows. Therefore, no impact would occur.

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

Less Than Significant Impact. A significant impact would occur if the Project Site is sufficiently close to the ocean or other water body (levee or dam) to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) and if discharges associated with the project's operation would create pollution and contamination due to inundation. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement.

According to the FEMA's flood insurance rate map, the Project Site is outside of a 100-year flood area.³⁵ However, a review of the City of Los Angeles General Plan Safety Element, the Proposed Project lies within a potential inundation zone mostly related to the flow coming from

³³ *City of Los Angeles, Department of City Planning, General Plan Elements, Safety Element Exhibit F, website: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed April 2019.*

³⁴ *Federal Emergency Management Agency (FEMA), Flood Map Service Center: Search by Address, Map Number 060337C1636G, December 21, 2008, website: <https://msc.fema.gov/portal/>, accessed April 2019.*

³⁵ *Ibid.*

reservoirs and water flow paths coming from the north of the Project Site.³⁶ According to the Geotechnical Investigation, the Project Site is located within the Hansen Dam and Sepulveda Dam inundation areas. However, these reservoirs, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design, construction practices, and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum considered earthquake (MCE) for the Project Site. Therefore, the potential for inundation at the Project Site as a result of an earthquake-induced dam failure is considered low.

Additionally, the Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes typically associated with the operation of the Proposed Project. The use of these substances would comply with State health codes and regulations. Furthermore, the Proposed Project would be designed and constructed with the guidance of the Department of Building and Safety. The City of Los Angeles' Department of City Planning and Department of Building and Safety would review the Proposed Project prior to the issuance of a building permit and provide recommendations to ensure that any impacts from the risk release of pollutants due to inundation are less than significant.

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

Less Than Significant Impact. A significant water quality impact could occur if a project is not consistent with the Los Angeles Region Water Quality Control Plan or the Sustainable Groundwater Management Act (SGMA), or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of a Groundwater Sustainability Plan.

In 2014, the California Legislature and Governor passed the Sustainable Groundwater Management Act (SGMA), which encourages local agencies to take a leading role in managing their local groundwater resources. The SGMA, a collection of three bills (AB 1739, SB 1168, and SB 1319), provides local agencies with the framework necessary to sustainably manage medium and high priority groundwater basins, as described by the act, with the goal to bring the basins into balance in 20 years. The intent of SGMA is to require sustainable groundwater management practices statewide, which will provide a buffer against drought and climate change. The California Department of Water Resources (DWR) has prioritized all groundwater basins according to certain criteria established in the California Water Code. The rankings are very low, low, medium, and high. SGMA compliance requires that local agencies form Groundwater Sustainability Agencies (GSAs) for medium- and high-priority groundwater basins no later than June 30, 2017 and adopt a Groundwater Sustainability Plan (GSP) no later than January 31, 2022. Currently, the Project Site is located within the Coastal Plain of Los Angeles – Central basin, which is neither classified as a medium nor high priority groundwater basin. Therefore, the Project Site is not subject to a sustainable groundwater management plan.

³⁶ *City of Los Angeles Department of City Planning, General Plan Safety Element, Safety Element Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994.*

Nevertheless, as discussed above, adherence to Chapter VI, Article 4.4 of the LAMC would ensure that the Proposed Project would not interfere with groundwater recharge. Therefore, the Proposed Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant.

The applicable water quality control plan applicable to the Proposed Project is the LARWQCB Water Quality Control Plan for the Los Angeles Region (Basin Plan), which was adopted on June 13, 1994. The Los Angeles Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. As discussed previously under Question X(a), the Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes typically associated with the operation of the Proposed Project. The use of these substances would comply with State health codes and regulations. Further, the Proposed Project would comply with all federal, state and local regulations governing stormwater discharge. Additionally, the Proposed Project would be required to comply with LAMC Chapter VI, Article 4.4 and all applicable laws and regulations pertaining to stormwater runoff and water quality. Therefore, the Proposed Project would not include potential sources of water pollutants that would have the potential to substantially degrade water quality, and impacts to water quality would be less than significant.

As discussed within this section, the Proposed Project is not subject to a Groundwater Sustainability Plan and would not conflict with or obstruct implementation of the LADWP Water Quality Control Plan. Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in combination with related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding areas are served by the existing City of Los Angeles drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects in the Project vicinity would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site, and the related project sites, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the LID Ordinance, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Proposed Project would not make a

cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) Physically divide an established community?

Less Than Significant Impact. A significant impact may occur if the Proposed Project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Proposed Project.

The Project Site is located in an urbanized area of the Central City North Community Plan Area and is consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. The zoning for the Project Site is M3-1-RIO, and the land use designation for the Project Site is Heavy Industrial. The zone corresponding to the Heavy Industrial land use designation is the M3 zone. As discussed in Section 3. Project Description, are shown in Figure 3.3 and Figure 3.5, the Project Site is surrounded by a mix of commercial uses (including restaurants, retail, and cafes), mixed-use residential, multi-family residential, manufacturing, and industrial uses. These land uses range in height from one- to five-stories above grade. Further, a seven-story mixed-use residential and commercial building (ZA-2013-4075-ZAD-ZV-SPR) is currently under construction located immediately adjacent to the west and north of the Project Site. Properties surrounding the Project Site are all zoned M3-1-RIO with General Plan land use designations of Heavy Industrial, similar to the Project Site.

The Proposed Project requests a zone and height district change to C2-2-RIO with a land use designation of Regional Center Commercial. The Proposed Project would involve the addition of the three-story hotel building for the development of a 15-story hotel building with a total of 103

guest rooms and approximately 15,607 square feet of commercial space. The adjacent construction site located at 695 South Santa Fe Avenue proposes a seven-story mixed-use residential and commercial development. Additionally, live/work units are located in the building east of the Project Site. Therefore, the Project vicinity contains a mix of residential and commercial developments similar to the Proposed Project. No separations of uses or disruption of access between land use types would occur as a result of the Proposed Project. Accordingly, implementation of the Proposed Project would not disrupt or divide the physical arrangement of the established community, and a less than significant impact would occur.

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?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate. A significant impact may also occur if a project would conflict with any applicable land use plan, policy, or regulations of an agency that has jurisdiction over the Project Site.

The Project Site is located within the jurisdiction of the City of Los Angeles, and is therefore subject to the designations and regulations of several local and regional plans. At the regional level, the Project Site is located within the planning area of SCAG, the Southern California region’s federally designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the SCAQMD. At the local level, development of the Project Site is guided by the General Plan of the City of Los Angeles, the Central City North Community Plan, the LAMC, the Central Industrial Redevelopment Plan (ZI-2488), the Residential Hotel Unit Conversion Demolition Ordinance (ZI-2353), the River Improvement District Overlay District (ZI-2358), and the East Los Angeles State Enterprise Zone (ZI-2129), all of which are intended to guide local land use decisions and development patterns.

Regional Plans

SCAQMD Air Quality Management Plan

The Proposed Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD’s most recent Air Quality Management Plan (AQMP) was updated in 2017 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. With the approval of the requested discretionary General Plan amendment and zoning/height district change, the Proposed Project would conform to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. Furthermore, as noted in Checklist Question III, Air Quality, the Proposed Project would not exceed the daily emission thresholds during the construction or operational

phases of the Proposed Project. Therefore, the Proposed Project would be consistent with the 2016 AQMP.

SCAG Regional Comprehensive Plan and Guide

The Project Site is located within the six-county region that comprises the SCAG planning area. On September 3, 2020, SCAG’s Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). In 2012, SCAG adopted the region’s first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – a plan that the Regional Council now calls Connect SoCal. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks and between planning strategies. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Proposed Project would be consistent with the goals and policies set forth in Connect SoCal, as the Proposed Project would redevelop a site that is currently developed with a three-story hotel building and would include the construction of a 15-story hotel building. The Proposed Project would thereby increase the utilization of a property that is easily accessible by mass transit. Consistent with SCAG goals, the Proposed Project would increase commercial/hotel opportunities in an area served by mass transit. Furthermore, as the Proposed Project would result in an increase of 103 guest rooms and 15,907 square feet of commercial space comprised of art gallery, café, restaurant and bar space, generating an increase of approximately 216 new employees,³⁷ the Proposed Project would be consistent with SCAG’s employment growth projections.

Local Plans

City of Los Angeles General Plan

The Proposed Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 community plans.

The elements that would be most applicable to the Proposed Project are the Framework Element, the Mobility Plan, and the Land Use Element. The Project Site is currently zoned M3-1-RIO. The M3 zoning designation corresponds with the existing Heavy Industrial land use designation on-site. Additionally, the Project Site has a land use designation with the Central City North Community Plan, of Heavy Industrial. The Proposed Project requests a General Plan amendment and zoning/height district change to a zone C2-2-RIO with a land use designation of Regional Center Commercial to allow for the hotel and commercial uses.

³⁷ See Checklist Question XIV a) Population and Housing.

Framework Element

The General Plan's Framework Element provides citywide guidelines and a foundation upon which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The General Plan's Framework Element was adopted on December 11, 1996 and re-adopted on August 8, 2001. The Framework Element and the City's community plans discuss population, housing and employment to the year 2010. The Framework Element identifies a projected population of 4.3 million people living in 1,566,108 housing units. The Citywide General Plan Framework and the Central City North Community Plan provide growth projections and CPA capacity, respectively, for the year 2010. The Central City North Community Plan recognizes that the Community Plan Area (CPA) may grow that population, jobs, and housing could grow more quickly, or slowly, than anticipated depending on economic trends.

The Framework Element provides citywide guidelines and a foundation on which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies.

The Proposed Project would be generally consistent with the policy and objectives of the Land Use Chapter by providing hotel and commercial land uses that support the needs of the City's existing and future businesses and visitors. In addition, development of the Proposed Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution, while supporting the City's objective to encourage commercial uses along primary transit corridors/boulevards. The Proposed Project would be generally consistent with the goal, objectives and policies of the Urban Form and Neighborhood Design Chapter by providing new hotel and commercial uses available to the public including sidewalks, outdoor seating areas and streetscape improvements located along East 7th Street and fronting the proposed commercial uses that would enhance pedestrian activity. The Proposed Project would be generally consistent with the Economic Development Chapter by creating opportunities for new businesses or the expansion or relocation of existing businesses, and fostering new business and employment opportunities and potential customers, in an area well-served by transit.

As such, the Proposed Project would be generally consistent with the Framework Economic Development Chapter's goals and objectives that focus on commercial competitiveness, job creation and retention, and economic prosperity for the City of Los Angeles. The Proposed Project is in substantial conformity with the purposes, intent and provisions of the General Plan Framework Element, and the applicable Community Plan by providing a smart growth oriented, dense urban project where such growth is best accommodated based on its proximity to mass transit. Therefore, the Proposed Project would not conflict with the goals, objectives, and policies set forth in the Framework Element of the General Plan.

Mobility Plan 2035

The Mobility Plan 2035 ("Mobility Plan") of the City of Los Angeles General Plan, adopted September 7, 2016, is designed to provide a policy foundation for the transportation system

within the City of Los Angeles. There are five goals of the Mobility Plan that define the City's high-level mobility priorities and include: safety first; world class infrastructure; access for all Angelenos; collaboration, communication and informed choices; and clean environments and healthy communities. The Mobility Plan contains several objectives pertinent to the Proposed Project, which are identified as follows:

- Increase the number of adults and children who receive in-person active transportation safety education, in areas with the highest rates of collisions, by 10% annually;
- Ensure that 80% of street segments do not exceed targeted operating speeds by 2035;
- Increase the combined mode split of persons who travel by walking, bicycling or transit to 50% by 2035.

With respect to the Mobility Plan's stated objectives, the Proposed Project would increase commercial uses within one mile to the Transit Enhanced Network, provide employees and patrons within one-half mile to high quality bicycling facilities, and increase the combined mode split of persons who travel by walking, bicycling, or transit. As discussed in Chapter VI of the Transportation Assessment (Appendix G to this IS/MND), the Project would implement a TDM program to reduce the use of single-occupant vehicle trips, encourage developers to construct transit-friendly projects, and provide efficient and effective traffic management and monitoring.

Further, the Proposed Project would not include unusual or hazardous design features. Primary vehicular access would be provided via one valet drop-off area located along the west side of Santa Fe Avenue, adjacent to the Project Site. The Proposed Project does not include any hazardous design features, which could impede emergency access. The Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles and to ensure pedestrian safety. Therefore, the Proposed Project would promote the goals of the Mobility Plan.

Central City North Community Plan

The Project Site is located within the Central City North Community Plan area. Therefore, all development activity on-site is subject to the land use goals, objectives and policies of the Central City North Community Plan (Community Plan). The Project Site has a General Plan land use designation of Heavy Industrial. With approval of the requested General Plan amendment and zone/height district change, the Project Site would be zoned C2-2-RIO with a General Plan land use designation of Regional Center Commercial, which permits the hotel and commercial uses of the Proposed Project. The C2 (Regional Center Commercial) land use designation contains numerous policies designed to enhance commercial activity. The Los Angeles Municipal Code allows for the development of hotel and commercial uses within certain commercial zones.

The Proposed Project would be generally consistent with applicable policies of the Central City North Community Plan. The Proposed Project would revitalize the area with the development of a 15-story hotel building. The Proposed Project would provide an increase of 103 guest rooms

and 15,907 square feet of commercial space (restaurant, cafe, bar, and art gallery spaces). The Proposed Project would complement the neighborhood with development of hotel and commercial space that would support and maintain the viability of neighborhood stores and businesses. The Proposed Project would consist of a commercial hotel development, which would provide additional foot traffic for the surrounding commercial uses along 7th Street and Santa Fe Avenue. Additionally, the Proposed Project would enhance existing pedestrian street activity by providing active uses that would front 7th Street and Santa Fe Avenue and would be located near adequate services and facilities, which would reduce vehicular trips and congestion. As such, the Proposed Project would not conflict with the applicable goals, objectives, and policies of the Central City North Community Plan.

Central Industrial Redevelopment Project Plan

Development on the Project Site is further defined by the Redevelopment Plan for the Central Industrial Redevelopment Project (“Redevelopment Plan”). Development in the Redevelopment Project Area is governed by the Redevelopment Plan that was adopted on November 15, 2002 by the CRA/LA and remains effective until November 15, 2032. Pursuant to Ordinance 183,325 (effective 11/11/19), the authority or responsibility to perform actions and related land use functions regarding any Redevelopment Plan Amendment or land use approval or entitlement pursuant to Section 11.5.14 and applicable provisions of the Code was transferred to the Department of City Planning. The Redevelopment Plan identifies overall objectives and development standards to guide the development, redevelopment, and rehabilitation of properties within the Central Industrial area.

The Proposed Project would be generally consistent with the applicable goals of the Central Industrial Redevelopment Project Plan. The Proposed Project would prevent the spread of blight and deterioration by redeveloping an underutilized site and rehabilitating an existing vacant building with interior renovations and constructing a new addition to enhance the surrounding neighborhood. The on-site hotel uses would provide new foot traffic for the surrounding businesses. Additionally, the Project Site is in close proximity to many public transportation. Through private agreement, the Proposed Project would provide adequate, convenient and safe parking facilities at an off-site location. Further, the Proposed Project would be constructed to meet all code requirements of the LAMC, and would be sustainability designed to meet or exceed all Title 24 Standards of the California Administrative Code and the L.A. Green Building Code. As such, the Proposed Project would not conflict with the applicable goals, objectives, and policies of the Central Industrial Redevelopment Project Plan.

Residential Hotel Unit Conversion Demolition Ordinance (ZI-2353)

The Residential Hotel Unit Conversion Demolition Ordinance, adopted May 20, 2008, regulates the conversion or demolition of a residential hotel, or any new development on the site of a destroyed or demolished residential hotel, shall not be approved until the Los Angeles Housing and Community Investment Department (HCIDLA) has approved an Application for Clearance. The Proposed Project consists of a one-story addition to an existing vacant three-story residential hotel and the construction of a 15-story hotel building addition with a total of 103 guest rooms. The existing use on the Project Site does contain a vacant residential hotel development that has been inhabitable since 2014. The ground floor of the existing building

would be reconfigured into a hotel café and art gallery. The existing ground floor bar would remain as well as the existing circulation stair. The second and third floors of the existing building would be reconfigured into hotel guest rooms and hotel meeting rooms, and the 4th floor roof would be converted into an occupiable space for an enclosed hotel bar and uncovered outdoor lounges. Therefore, the Proposed Project requires approval and clearance from HCIDLA. As such, with clearance and approval from HCIDLA, the Proposed Project would not hinder the goals of this Ordinance, and impacts would be less than significant.

River Improvement District Overlay District (ZI-2358)

The River Improvement Overlay (RIO) District (pursuant to Ordinance Nos. 183,144 and 183,145) became effective in August 2014. All projects located in the RIO District are subject to the RIO District Checklist Form CP 3519 and require RIO Administrative Clearance. The Proposed Project shall conform to all of the development regulations detailed in the LAMC Section 13.17. The Los Angeles River Revitalization Master Plan (“Master Plan”) applies to any project located in the RIO District. The Master Plan aims to restore the Los Angeles River as the soul of the City by implementing four basic overarching principles: (1) Revitalize the River; (2) Green the Neighborhoods; (3) Capture Community Opportunities; and (4) Create Value. These principles are the foundation around which the Plan’s goals and recommendations have been identified. Additionally, the Master Plan provides a framework to update Community Plans that help promote the goals of the Master Plan and enhance the Los Angeles River. The Proposed Project would uphold the goals of the Master Plan and would require the approval of an RIO Administrative Clearance before a demolition or building permit can be issued. Thus, with approval of the RIO Administrative Clearance, the Proposed Project would be consistent with the regulations listed in LAMC Section 13.17 and the goals of the Los Angeles River Revitalization Master Plan principles. The Proposed Project has been designed in accordance with the LA River Design Guidelines and that are applicable to the Proposed Project. With approval of the requested zone and height district change / land use designation change, the Proposed Project would comply with all applicable General Plan and zoning designations.

East Los Angeles State Enterprise Zone (ZI-2129)

Enterprise Zones (EZ) are specific geographic areas that are designed by City County resolution and have received approval from the California Department of Commerce, with the goal to “provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services.”³⁸ Parking Standards, described in Section 12.21A4(x)(3) of the LAMC, states projects within EZs may utilize a lower parking ratio (two parking spaces for every one thousand square feet of combined gross floor area) for certain land uses, including retail and other related uses, in order to increase the buildable areas of a parcel in older areas of the City where Parcels are small. The Proposed Project would include approximately 15,907 square feet of total commercial space comprised of art

³⁸ *City of Los Angeles, Community Development Department, ZI No. 2129 Enterprise Zone / Employment and Economic Incentive Program Area (EZ), website: <http://zimas.lacity.org/documents/zoneinfo/ZI2129.pdf>, accessed April 2019.*

gallery, café, restaurant and bar uses. Accordingly, the Proposed Project would be required to provide 32 commercial vehicle parking spaces. The Proposed Project would provide parking off-site through a private agreement. A valet-option would be provided on-site along Santa Fe Avenue adjacent to the Project Site. Therefore, the Proposed Project would provide the required number of commercial parking spaces, consistent with the requirements of the East Los Angeles Enterprise Zone.

Los Angeles Municipal Code

The Project Site is located within the City of Los Angeles, which is also subject to the applicable sections of the City of Los Angeles Municipal Code (LAMC). The Project Site is currently occupied by a three-story hotel building and a surface parking lot on an approximately 11,286 square foot lot. The Project Site is currently zoned M3-1-RIO and requests a zone change to C2-2-RIO. The Project Site General Plan land use designation is currently Heavy Industrial and requests a General Plan amendment to change the Community Plan land use designation to Regional Center Commercial. The following paragraphs discuss the Proposed Project's compliance with the building standards of the LAMC.

Land Use

With approval of a zone change, the Project Site would be zoned C2-2-RIO. The Proposed Project would be comprised of 103 guestrooms and 15,907 square feet of commercial uses, which includes art galleries/studios, cafe, bar, and restaurant uses. The proposed hotel and commercial uses are permitted on lots zoned C2 as a use by right.

Floor Area

The Project Site includes approximately 11,286 square feet of lot area. Development on the Project Site is limited to a Floor Area Ratio (FAR) of 1.5:1 based on existing zoning, resulting in an allowable floor area of 16,929 square feet. The Proposed Project is requesting a height district change from Height District No. 1 to Height District No. 2, which would permit an FAR of 6:1 on-site. The Proposed Project would provide approximately 67,615 square feet of floor area, resulting in an FAR of 6:1 on the 11,286 square foot site. As such, the Proposed Project would be consistent with the allowed FAR.

Height

The proposed 15-story building is planned for a maximum roof height of approximately 172 feet and five inches above grade at its highest point. The Applicant is requesting a height district change from Height District No. 1 to Height District No. 2. Pursuant to LAMC Section 12.21.1, neither the current or proposed height district designations limit height of buildings. Therefore, the Proposed Project would be within the allowed height limit.

Setbacks

Pursuant to LAMC Section 12.14(C), no front, side, or rear yard setbacks are required in the C2 Zone for commercial developments. For all residential portions of the building, including hotel

uses, the R4 Zone side and rear yard requirements apply. As such, the Proposed Project would be required to provide a minimum 5-foot side yard setbacks plus one additional foot for each story over the 2nd story with a maximum 16-foot side yard setback; and a minimum 15-foot rear yard setback plus one additional foot for each story over the 3rd story with a maximum 20-foot rear yard setback. As such, the Proposed Project would require 16-foot side yard setbacks and a 20-foot rear yard setback. The Proposed Project is requesting a Zoning Administrator's Adjustment to maintain an existing non-conforming 4'0 western side yard setback for the 2nd and 3rd floors of the existing building and to allow a three-foot rear yard setback and an 11-foot side yard setback, in lieu of the side and rear yard setbacks required by the LAMC. The Proposed Project would provide an 11-foot side yard setback along the western property line and a three-foot rear yard setback along the northern property line. As such, with approval of discretionary requests, the Proposed Project's would be consistent with the allowed setback requirements.

Open Space

The Proposed Project would include the construction of a 15-story hotel building. Thus, as a hotel project, the Proposed Project is not required to provide open space. Nevertheless, the Proposed Project would include several outdoor lounges and terrace areas to reduce demand and utilization of local parks in the Project vicinity.

Vehicle Parking

Pursuant to LAMC 12.21.A.4.(p), there shall be one parking space for each two guest rooms for the first 20 rooms, one space for each four guest rooms in excess of 20 but not exceeding 40, and one additional parking space for each six guest rooms in excess of 40. As such, the Proposed Project would be required to provide 26 parking spaces for the hotel uses. However, pursuant to LAMC 12.21.A.4, residential buildings (including hotels), may replace 10 percent of the required automobile parking with bicycle parking, which equates to two parking spaces. Therefore, the Proposed Project's required parking spaces for hotel uses is 24 spaces. With regards to commercial uses, pursuant to LAMC 12.21.A.4.(x)(3) and the requirements of the State Enterprise Zone parking standards, the Proposed Project would be required to provide two parking spaces for every 1,000 square feet of commercial use. The Proposed Project's commercial uses would require the provision of 32 vehicle parking spaces. In total, the Proposed Project's commercial and hotel uses would require 56 vehicle parking spaces.

The required parking spaces for the Proposed Project would be provided off-site through a private agreement. A valet-option would be provided on-site along Santa Fe Avenue.

Bicycle Parking

Following LAMC 12.21.A.16(a)(1)(ii), all hotels containing more than five guest rooms shall provide both short- and long-term bicycle stalls at a rate of one per 20 guest rooms. Therefore, there shall be five short-term and five long-term bicycle parking stalls at the Project Site for hotel uses. Further, LAMC 12.21.A.16(a)(2) states that both short-term and long-term bicycle parking shall be provided for commercial uses at a rate of one per 2,000 square feet of commercial space. With regards to commercial uses, the Project Site is required to have eight short-term and eight long-term bicycle parking stalls. In total, the Proposed Project's commercial and hotel

uses would require 13 short-term and 13 long-term bicycle parking stalls. The Proposed Project would meet this requirement by providing 13 short-term bicycle parking stalls and 13 long-term bicycle parking stalls for a total of 26 bicycle parking stalls. As such, the Proposed Project would be consistent with the Bicycle Parking Ordinance.

As discussed in the preceding paragraphs, the Proposed Project would not conflict with local and regional plans applicable to the Project Site. With approval of discretionary requests and adherence to appropriate regulatory compliance measures, any impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, the Proposed Project’s land use impacts would not be cumulatively considerable since the Proposed Project would not conflict with applicable local or regional plans and the Proposed Project’s land use impacts would be less than significant.

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. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The determination of significance

shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is zoned M3-1-RIO. The Project Site is not located within an oil field or drilling area.³⁹ However, the Project Site is located within a Mineral Resources Zone 2 (MRZ-2).⁴⁰ The State Geologist identifies that primary mineral resources within the City of Los Angeles are rock, gravel, and sand deposits that follow the Los Angeles River flood plain. Based on the City's Environmental and Public Facilities Maps, almost the entire east side of the Downtown Los Angeles area is located within a MRZ-2 Zone. This zoning does not necessarily restrict development on the Project Site, nor does it protect mineral resources. The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Since no mineral extraction is occurring on-site, the development of the Proposed Project would not result in a loss of extracting mineral resources. The Project Site is currently developed with a three-story hotel building and paved surface parking. Development of the Project Site would not block or hinder access or availability of mineral resources, since there are currently no extraction activities on-site and no plans to extract mineral resources. Therefore, the development of the Proposed Project would not result in the loss of availability of a known mineral resource, and a less than significant impact would occur.

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. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is located within a Mineral Resources Zone 2 (MRZ-2).⁴¹ However, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has historically been used for the extraction of mineral resources. Therefore, a less than significant impact to locally important mineral resources would occur.

Cumulative Impacts

Less Than Significant Impact. The analysis of cumulative impacts to mineral resources is generally site-specific. As such, the potential for cumulative impacts to occur is geographically limited. Based on the City's Environmental and Public Facilities Maps, almost the entire east

³⁹ *City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, 1996.*

⁴⁰ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

⁴¹ *Ibid.*

side of the downtown Los Angeles area is located within a MRZ-2 Zone.⁴² Therefore, cumulative development within the City of Los Angeles has the potential to impact the availability of a locally important mineral resource. Because urban uses, such as residential and commercial development, would generally be considered inconsistent with mineral extraction activities, development of these uses in the vicinity of mineral resource sites could hinder or preclude mineral extraction activities. Therefore, cumulative development within the region could result in the loss of availability of some mineral resources. However, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has historically been used for the extraction of mineral resources. The Proposed Project would not result in loss of, or loss of access to, a mineral resource. Therefore, the Proposed Project's contribution to the cumulative loss of available mineral resources or of a known mineral resource that would be of value to the region and/or the residents of the state would not be cumulatively considerable. Cumulative impacts to mineral resources would be less than significant.

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 type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input checked="" 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"/> |

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since

⁴² *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady “background” noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

L_{eq} – An L_{eq} , or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

L_{max} – The maximum instantaneous noise level experienced during a given period of time.

L_{min} – The minimum instantaneous noise level experienced during a given period of time.

CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA “weighting” added during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA “weighting” added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

According to the World Health Organization (WHO), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to convert noise at 100 dBA, can also damage hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.⁴³

Noise levels from a particular source generally declines as distance to the receptor increases. Sound from a small localized source (approximating a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates or drops off at a rate of 6 dBA for each doubling of the distance. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally

⁴³ *City & County of San Francisco Superior Court, Mission Bay Alliance v. Office of Community Investment and Infrastructure, November 29, 2016.*

reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures, such as hills, manmade features, buildings, and walls. Generally, for an at-grade facility in an average residential area where the first row of buildings cover at least 40 percent of total area, the reduction provided by the first row is reasonably assumed to be 3 dBA, with 1.5 dBA for each additional row. For buildings spaced tightly, the first row provides about 5 dBA of reduction, successive rows reduced noise by 1.5 dBA per row, with a maximum reduction limit of 10 dBA.⁴⁴ Additional noise attenuation can be provided within residential structures. Depending on the quality of the original building façade, especially windows and doors, sound insulation treatments can improve the noise reduction by 5 to 20 dBA.⁴⁵

Ambient Noise Levels

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure 4.1, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations near the Project Site and fronting the nearby land uses as the most likely sensitive receptors to experience noise level increases during construction and at the major roadways surrounding the Project Site. The detailed noise monitoring data are presented in Appendix F, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table 4.10, Existing Ambient Daytime Noise Levels. As shown in Table 4.10, the ambient noise in the vicinity of the Project Site ranges from 74.7 to 78.2 L_{eq} . The maximum instantaneous noise level during the three 15-minute recordings was 102.1 dB L_{max} along 7th Street, where a police car with active sirens passed by the noise monitor. The primary noise sources that contributed most to the measured ambient noise levels was vehicle traffic during the daytime hours, including cars, buses, and delivery trucks.

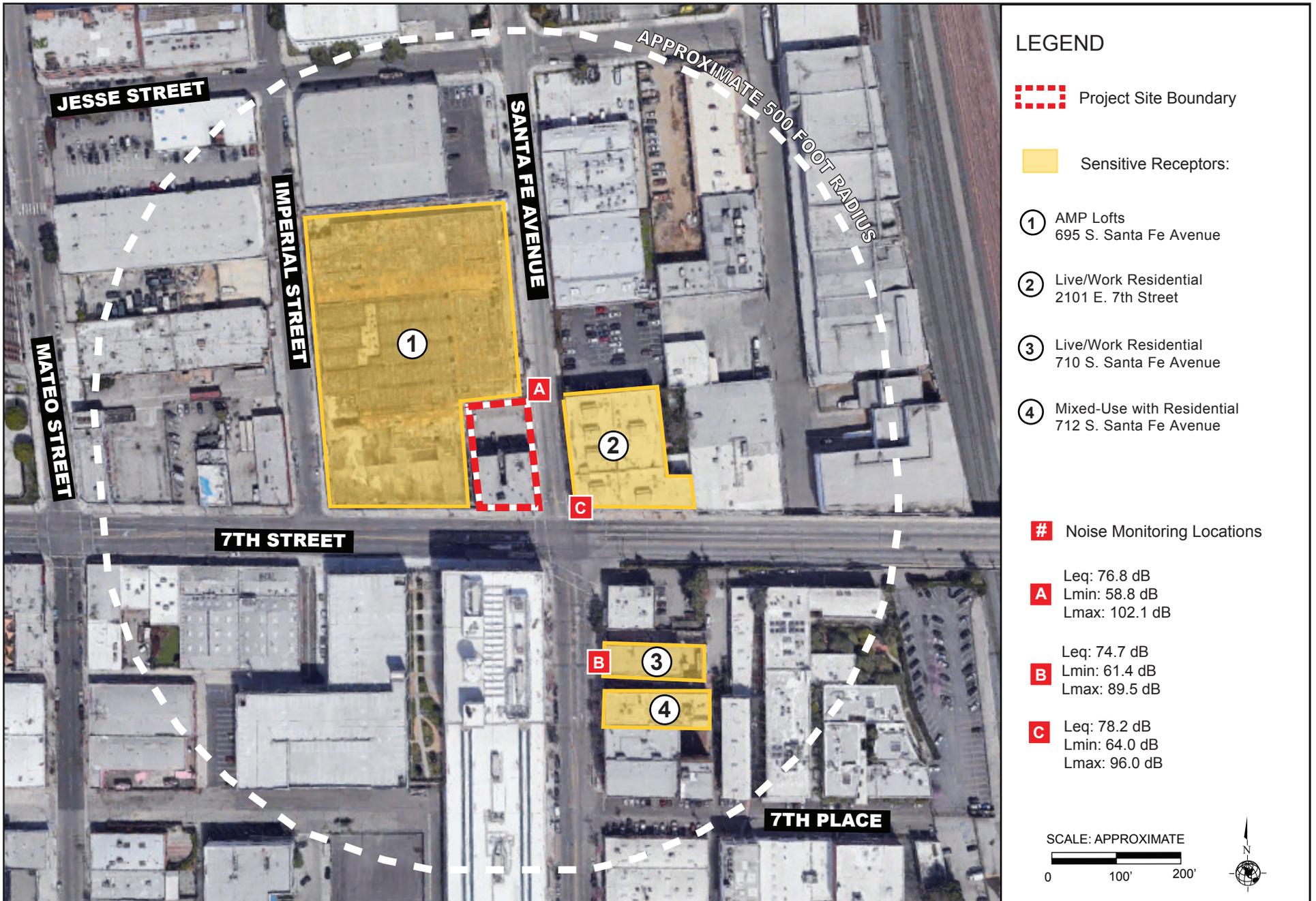
Sensitive Receptors

Several noise sensitive land uses are located adjacent to and in the vicinity of the Proposed Project. For purposes of assessing noise and groundborne vibration impacts on sensitive populations, the following sensitive receptors in close proximity (within 500 feet) to the Project Site were identified:

- 1) A mixed-use development with multi-family dwelling units, located at 695 South Santa Fe Avenue;
- 2) A live/work residential building, located at 2101 East 7th Street;
- 3) A live/work residential building, located at 710 South Santa Fe Avenue; and
- 4) A multi-family residential building, located at 712 South Santa Fe Avenue.

⁴⁴ California Department of Transportation, Division of Environmental Analysis, *Technical Noise Supplement*, September 2013.

⁴⁵ Federal Transit Administration, *Transit Noise and Vibration Assessment Manual*, September 2018.



Source: Google Earth, Aerial View, 2019.

**Table 4.10
Existing Ambient Daytime Noise Levels**

| ID | Location | Primary Noise Sources | Noise Level Statistics ^a | | |
|----|---|---|-------------------------------------|------------------|------------------|
| | | | L _{eq} | L _{min} | L _{max} |
| A | On the west side of Santa Fe Avenue, on the northeast corner of the Project Site | Vehicle traffic, light pedestrian activity, delivery trucks, buses, police siren, helicopters | 76.8 | 58.5 | 102.1 |
| B | On the northeast corner of the intersection of Santa Fe Avenue and 7 th Street | Heavy vehicle traffic, light pedestrian activity, delivery trucks, buses | 78.2 | 64.0 | 96.0 |
| C | On the east side of Santa Fe Avenue, south of 7 th Street | Heavy vehicle traffic, delivery trucks, light pedestrian activity, buses | 74.7 | 61.4 | 89.5 |

Notes:
^a Noise measurements were taken on Tuesday, April 2, 2019 at each location for a duration of 15 minutes. See Appendix F of this IS/MND for noise monitoring data sheets.
Source: Parker Environmental Consultants, 2020.

The locations of these land uses relative to the Project Site are depicted in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 3.5, Photographs of the Surrounding Land Uses.

- a) **Result in 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?**

Less Than Significant Impact With Mitigation Incorporated. A significant impact may occur if the Proposed Project would generate excess noise that would cause the ambient noise environment to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance). Implementation of the Proposed Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below. A significant impact may also occur if the Proposed Project were to result in a substantial temporary or periodic increase or a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Proposed Project.

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source.⁴⁶ However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers,

⁴⁶ As shown in Figure 3.2, Zoning and General Plan Land Use Designations, the properties surrounding the Project Site are zoned Heavy Manufacturing (M3-1-RIO) or Regional Commercial ([Q]C2-1-RIO). Thus LAMC Section 112.05 is not applicable to the Proposed Project. Notwithstanding the M3 zone designation, the Proposed Project's noise impacts upon adjacent residential land uses is addressed in this analysis in accordance with the L.A. CEQA Thresholds Guide.

shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. Pursuant to the *L.A. CEQA Thresholds Guide*, a significant construction noise impact would occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than ten days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would also normally result in a significant impact.

For operational noise impacts, a project would normally have a substantial permanent increase in ambient noise levels from Proposed Project operations if the Proposed Project causes the ambient noise level measured at the property line of affected uses that are shown in Table 4.11, Community Noise Exposure Level (CNEL), to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase.

**Table 4.11
Community Noise Exposure Levels (CNEL)**

| Land Use | Normally Acceptable^a | Conditionally Acceptable^b | Normally Unacceptable^c | Clearly Unacceptable^d |
|--|--|---|--|---|
| Single-family, Duplex, Mobile Homes | 50 - 60 | 55 - 70 | 70 - 75 | above 75 |
| Multi-Family Homes | 50 - 65 | 60 - 70 | 70 - 75 | above 75 |
| Schools, Libraries, Churches, Hospitals, Nursing Homes | 50 - 70 | 60 - 70 | 70 - 80 | above 80 |
| Transient Lodging – Motels, Hotels | 50 - 65 | 60 - 70 | 70 - 80 | above 75 |
| Auditoriums, Concert Halls, Amphitheaters | --- | 50 - 70 | --- | above 70 |
| Sports Arena, Outdoor Spectator Sports | --- | 50 - 75 | --- | above 75 |
| Playgrounds, Neighborhood Parks | 50 - 70 | --- | 67 - 75 | above 75 |
| Golf Courses, Riding Stables, Water Recreation, Cemeteries | 50 - 75 | --- | 70 - 80 | above 80 |
| Office Buildings, Business and Professional Commercial | 50 - 70 | 67 - 77 | above 75 | --- |
| Industrial, Manufacturing, Utilities, Agriculture | 50 - 75 | 70 - 80 | above 75 | --- |

^a *Normally Acceptable:* Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

^b *Conditionally Acceptable:* New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

^c *Normally Unacceptable:* New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

^d *Clearly Unacceptable:* New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Thus, a significant impact would occur if noise levels associated with operation of the Proposed Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting an LAMC violation.

Construction Noise

Construction of the Proposed Project would require the use of heavy equipment for demolition and site 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. The U.S. Environmental Protection Agency (EPA) has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur on-site are presented in Table 4.12, Typical Outdoor Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

**Table 4.12
Typical Outdoor Construction Noise Levels**

| Construction Phase | Noise Levels at 50 Feet with Mufflers (dBA L_{eq}) | Noise Levels at 60 Feet with Mufflers (dBA L_{eq}) | Noise Levels at 100 Feet with Mufflers (dBA L_{eq}) | Noise Levels at 200 Feet with Mufflers (dBA L_{eq}) |
|---------------------------|--|--|---|---|
| Ground Clearing | 82 | 80 | 76 | 70 |
| Excavation, Grading | 86 | 84 | 80 | 74 |
| Foundations | 77 | 75 | 71 | 65 |
| Structural | 83 | 81 | 77 | 71 |
| Finishing | 86 | 84 | 80 | 74 |

Source: United States Environmental Protection Agency, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971.

The noise levels shown in Table 4.12, represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. Construction noise during the heavier initial periods of construction could be expected to be 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of construction activity.⁴⁷ These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA L_{eq} measured at 50 feet from the noise source to the receptor would reduce to 78 dBA L_{eq} at 100

⁴⁷ *Although the peak noise levels generated by certain construction equipment may be greater than 86 dBA at a distance of 50 feet, the equivalent noise level would be approximately 86 dBA L_{eq} (i.e., the equipment does not operate at the peak noise level over the entire duration).*

feet from the source to the receptor, and reduce by another 6 dBA L_{eq} to 72 dBA L_{eq} at 200 feet from the source to the receptor. Construction activities associated with the Proposed Project would be expected to generate similar noise levels to those shown in Table 4.12 during the approximate 18-month construction period.

The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. Pursuant to LAMC Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday. The construction activities associated with the Proposed Project would comply with the LAMC requirements.

As shown in Table 4.13, Estimated Exterior Construction Noise at Nearest Sensitive Receptors Without Mitigation, the Proposed Project's construction noise levels at Sensitive Receptor Nos. 3 and 4 would be under the 5-dBA threshold increase, and thus would not be significantly impacted by the Proposed Project. The ambient exterior noise levels would increase by more than the 5-dBA threshold at Receptor No. 1 and 2, since the Amp Lofts are immediately adjacent to the Project Site and the live/work residential building is approximately 50 feet east of the Project Site. Therefore, based on criteria established in the *L.A. CEQA Threshold Guide*, a substantial temporary or periodic increase in exterior ambient noise levels would occur for two of the four identified sensitive receptors.

As such, it is recommended that a temporary noise barrier be installed along the property lines to block the line-of-sight between the noise sources and Sensitive Receptor Nos. 1 and 2. The construction of a temporary $\frac{3}{4}$ inch plywood noise barrier would be capable of attenuating the noise level by approximately 10 dBA. As mentioned above, construction noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. In addition, the building materials used in each of the sensitive receptors would further attenuate construction noise for interior spaces. For example, standard building construction with closed glass windows can provide an exterior to interior noise reduction of about 20-25 dBA. Thus, construction noise would not adversely impact interior noise environments. Several noise reducing mitigation measures would also be incorporated to reduce the Proposed Project's exterior noise impacts during construction.

Table 4.13
Estimated Exterior Construction Noise at Nearest Sensitive Receptors Without Mitigation

| Sensitive Receptor ^a | Distance to Project Site (feet) | Existing Ambient Noise Levels (dBA L_{eq}) | Maximum Construction Noise Levels (dBA L_{eq}) | Ambient + Construction Noise Level (dBA L_{eq}) | Construction Significance Criteria (dBA L_{eq}) | Noise Impact Above 5-dBA Threshold (dBA L_{eq}) |
|--|--|---|---|--|--|--|
| 1. Amp Lofts 695 S. Santa Fe Ave. | < 50 | 76.8 | 86.4 | 86.9 | 81.8 | 5.1 |
| 2. Live/work Residential 2101 East 7 th Street | 50 | 78.2 | 86.4 | 87.0 | 83.2 | 3.8 |
| 3. Live/work Residential 710 S. Santa Fe Ave. | 200 | 74.7 | 69.4 | 75.8 | 79.7 | 0.0 |
| 4. Multi-family Residential 712 S. Santa Fe Ave. | 260 | 74.7 | 62.1 | 74.9 | 79.7 | 0.0 |

Notes:

^a See Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.

^b Sensitive Receptor No. 3 and 4 incorporates a 10-dB attenuation factor due to buildings separating the Project Site and sensitive receptors.

Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.

As noted in Mitigation Measure N-1 through N-4, noise control efforts to limit the construction activities to permissible hours of construction, incorporate noise shielding devices and sound mufflers, and operate machinery in a manner that reduces noise levels (i.e., not operating several pieces of equipment simultaneously if possible) would be effective in reducing noise impacts. The Proposed Project's construction noise levels would occur on a temporary and intermittent basis during the construction period of the Proposed Project. Pursuant to LAMC Chapter IV, Article 1, Section 41.40, exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday and federal holidays. Demolition and construction are prohibited on Sundays. The construction activities associated with the Proposed Project would comply with these LAMC requirements. Mitigation Measure N-1 would further restrict the permissible hours of construction to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

Further, the Applicant would be required to post informational signage providing contact information to report complaints regarding excessive noise (refer to Mitigation Measure N-5, below). Additionally, the Applicant would be required to provide courtesy notifications to adjacent business owners and residences a minimum of two weeks prior to commencement of construction (refer to Mitigation Measure N-6 below). The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Project Site, and City telephone numbers where violations can be

reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. With implementation of Mitigation Measures N-5 and N-6 and regulatory compliance measures, affected residents and business owners would be provided advanced notice of potential noise impacts and opportunities to comment on construction noise.

Implementation of Mitigation Measures N-1 through N-4 would reduce the noise levels associated with construction of the Proposed Project to nearby multi-family residents to the maximum extent that is technically feasible. As noted in Table 4.14, Estimated Exterior Construction Noise at Nearest Sensitive Receptors With Mitigation, estimated construction noise impacts would be substantially reduced to less than significant levels. Thus, based on the provisions set forth in LAMC 112.05, implementation of Mitigation Measures N-1 through N-6 would additionally ensure impacts associated with construction-related noise levels are mitigated to the maximum extent feasible, and temporary construction-related noise impacts would be considered less than significant in accordance with City requirements and standards.

**Table 4.14
Estimated Exterior Construction Noise at Nearest Sensitive Receptors With Mitigation**

| Sensitive Receptor ^a | Distance to Project Site (feet) | Existing Ambient Noise Levels (dBA L_{eq}) | Maximum Construction Noise Levels (dBA L_{eq}) | Ambient + Construction Noise Level (dBA L_{eq}) | Construction Significance Criteria (dBA L_{eq}) | Noise Impact Above 5-dBA Threshold (dBA L_{eq}) |
|--|--|---|---|--|--|--|
| 1. Amp Lofts 695 S. Santa Fe Ave. | < 50 | 76.8 | 76.4 | 79.6 | 81.8 | 0.0 |
| 2. Live/work Residential 2101 East 7 th Street | 50 | 78.2 | 76.4 | 80.4 | 83.2 | 0.0 |
| 3. Live/work Residential 710 S. Santa Fe Ave. | 200 | 74.7 | 59.4 | 74.8 | 79.7 | 0.0 |
| 4. Multi-family Residential 712 S. Santa Fe Ave. | 260 | 74.7 | 52.1 | 74.7 | 79.7 | 0.0 |

Notes:
^a See Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.
^b Sensitive Receptor Nos. 3 and 4 incorporates a 10-dB attenuation factor due to buildings separating the Project Site and sensitive receptors.
Source: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.

Mitigation Measures:

Increased Noise Levels (Demolition, Grading, and Construction Activities)

MM-N-1 Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.

- MM-N-2** The project contractor(s) shall employ state-of-the-art noise minimization strategies when using mechanized construction equipment. To the maximum extent practical, demolition and construction activities shall be scheduled and coordinated so as to avoid operating several pieces of equipment simultaneously, which cause high noise levels. Construction equipment shall not idle when not in use. The contractor shall place noise construction equipment as far from the Project Site edges as practicable.
- MM-N-3** The project contractor shall use power construction equipment with noise shielding and muffling devices. The noise mufflers shall be consistent with manufacturers' standards and be equipped with all construction equipment, fixed or mobile.
- MM-N-4** The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material capable of achieving a 10-dBA reduction in sound level.
- MM-N-5** An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.
- MM-N-6** The Applicant shall provide a courtesy notice of the project's construction related activities to adjacent business owners and residences a minimum of two weeks prior to commencement of construction.

Haul Truck Noise

During the course of the combined excavation and other construction activities, it is estimated that a total of approximately 2,500 cubic yards (cy) of soil and 266 tons of construction and demolition debris would be exported to a landfill located within the City. The highest daily haul trips would occur during the grading/excavation phase. It is anticipated that 14 cy capacity haul trucks would be used to export soil, resulting in a total of approximately 358 haul round trips, or approximately eight round trips per day (including four inbound and four outbound trips) for a projected duration of 44 hauling days. It is assumed that haul truck trips would occur uniformly predominately outside of peak hours. The local haul route exiting the Project Site to Sunshine Canyon Landfill and Waste Management Downtown Diversion recycling facility would travel east along 7th Street, and utilize the Breed Street on-ramp and Santa Fe Avenue / Mateo Street off-ramp to and from the I-10 Freeway, respectively. A Haul Truck Route program would be described for the Proposed Project and approved by LADOT as part of the Construction Management Plan (refer to Mitigation Measure MM-TR-1). Since haul truck loading and unloading activities would occur on-site and/or within the boundaries of an approved traffic

control plan and during the hours as required by the Noise Ordinance, the haul truck noise would be considered less than significant.

Operational Noise

HVAC Equipment Noise

Upon completion and operation of the Proposed Project, on-site operational noise would be generated by heating, ventilation, and air conditioning (HVAC) equipment installed on the new structures. However, the noise levels generated by these equipment types are not anticipated to be substantially greater than those generated by the current HVAC equipment serving the surrounding buildings in the Project vicinity. In addition, the operation of this and any other on-site stationary sources of noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Thus, because the noise levels generated by the HVAC equipment serving the Proposed Project would not be allowed to exceed the ambient noise level by five decibels on the premises of the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. Adherence to LAMC Section 112.02 would ensure the Proposed Project's noise impacts from HVAC equipment to be less than significant.

Trash Collection and Compactor

Further, the Proposed Project's trash collection areas and trash compactor would be located in the interior portions of the basement level (see Figure 3.7, Basement Level Floor Plan, of the Project Description). A loading/service lane area would be located on the eastern property line along Santa Fe Avenue near the valet drop-off area. Trash collection would occur in the interior portions of the ground floor, which would block the line of site to any surrounding sensitive receptors. Therefore, noise levels from trash collection and on-site trash compactor would be less than significant.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact With Mitigation Incorporated. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and

distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Construction Vibration

Excavation and earthwork activities for the Proposed Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities associated with the Proposed Project could have an adverse impact on sensitive structures (i.e., building damage).

Table 4.15, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table 4.15, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

**Table 4.15
Vibration Source Levels for Construction Equipment**

| Equipment | Approximate PPV (in/sec) | | | | | Approximate RMS (VdB) | | | | |
|------------------|--------------------------|---------|---------|---------|----------|-----------------------|---------|---------|---------|----------|
| | 25 Feet | 50 Feet | 60 Feet | 75 Feet | 100 Feet | 25 Feet | 50 Feet | 60 Feet | 75 Feet | 100 Feet |
| Large Bulldozer | 0.089 | 0.031 | 0.024 | 0.017 | 0.011 | 87 | 78 | 76 | 73 | 69 |
| Caisson Drilling | 0.089 | 0.031 | 0.024 | 0.017 | 0.011 | 87 | 78 | 76 | 73 | 69 |
| Loaded Trucks | 0.076 | 0.027 | 0.020 | 0.015 | 0.010 | 86 | 77 | 75 | 72 | 68 |
| Jackhammer | 0.035 | 0.012 | 0.009 | 0.007 | 0.004 | 79 | 70 | 68 | 65 | 61 |
| Small Bulldozer | 0.003 | 0.001 | 0.0008 | 0.0006 | 0.0004 | 58 | 49 | 47 | 44 | 40 |

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, 2006.

Structural Damage Impacts

For purposes of addressing construction-related vibration impacts on buildings, the City of Los Angeles has not adopted any policies or guidelines relative to groundborne vibration impacts. Consequently, the FTA and Caltrans adopted vibration standards for buildings which were used to evaluate potential impacts related to project construction. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table 4.16, below.

**Table 4.16
Vibration Damage Potential Threshold Criteria**

| Threshold Criteria | Maximum PPV (in/sec) | |
|---|----------------------|--|
| | Transient Sources | Continuous/Frequent Intermittent Sources |
| Structure and Condition | | |
| Extremely fragile historic buildings, ruins, ancient monuments | 0.12 | 0.08 |
| Fragile buildings | 0.2 | 0.1 |
| Historic and some old buildings | 0.5 | 0.25 |
| Older residential structures | 0.5 | 0.3 |
| New residential structures | 1.0 | 0.5 |
| Modern industrial/commercial buildings | 2.0 | 0.5 |
| <i>Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Chapter 7: Vibration Prediction and Screening Assessment for Construction Equipment, Table 19. September 2013.</i> | | |

The nearest off-site structure that would be potentially susceptible to groundborne vibration impacts is the Amps Lofts Building, which immediately abuts the Project Site to the north and west at 695 South Santa Fe Avenue. Due to the relatively short distance between the proposed structure and the adjacent building, the Proposed Project would have the potential to exceed the groundborne vibration thresholds for structural damage. However, the potential for such impacts to occur can be avoided with proper construction planning and design recommendations. Tieback and soldier piles would be employed to protect the buildings during excavation and foundation work as the site is excavated. Furthermore, protection against damage to adjacent structures is provided by existing law. Both the California Civil Code and the LAMC impose affirmative obligations on excavating landowners to protect against damage to adjacent structures. Civil Code Section 832 requires that excavating owners give notice of the excavation to owners of adjoining lands and buildings, use ordinary care and skill and take reasonable precautions to sustain adjoining land. Civil Code Section 832 also imposes additional obligations on owners excavating deeper than nine feet. LAMC Section 91.3307 requires that adjoining public and private property, including without limitation footings and foundations, be protected from damage during construction. The monitoring program shall survey for vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, or noticeable structural damage becomes evident to the Project contractor, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to the surrounding resources. Because the Proposed Project's worst-case vibration impacts are expected to be limited to repairable cosmetic damage, the Proposed Project would not result in excessive groundborne vibration. With implementation of Mitigation Measure N-7, any groundborne vibration impacts on the surrounding buildings would be reduced to less than significant levels.

Mitigation Measures:

MM-N-7 Temporary Groundborne Vibration Impacts

- All new construction work shall be performed so as not to adversely affect the structural integrity of the buildings surrounding the Project Site. Prior to commencement of construction, a qualified structural engineer shall survey the

existing foundations and structures of the Amp Lofts, located 695 South Santa Fe Avenue, and provide a plan to protect them from potential damage. The structural monitoring program shall be implemented and recorded during construction.

- The performance standards of the structure monitoring plan shall including the following:
 - The qualified structural engineer shall monitor vibration during vibration-causing construction activities to ensure that the established impact threshold and shoring design is not exceeded. If feasible, alternative means of setting piles such as predrilled holes or hydraulic pile driving shall be employed to avoid exceeding the impact threshold established. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-on letter describing damage, if any, to immediately adjacent buildings and recommendations for any repair.
 - The monitoring program shall survey for vertical and horizontal movement, as well as vibration thresholds. If the thresholds are met or exceeded, or noticeable structural damage becomes evident to the Project contractor, work shall stop in the area of the affected building until measures have been taken to stabilize the affected building to prevent construction related damage to adjacent buildings.

Operational Vibration

The Proposed Project would include a hotel and commercial development and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Although groundborne vibration at the Project Site and immediate vicinity may currently result from heavy-duty vehicular travel (e.g., refuse trucks and transit buses) on the nearby local roadways, the proposed land uses at the Project Site would not result in the increased use of these heavy-duty vehicles on the public roadways. While refuse trucks would be used for the removal of solid waste at the Project Site, these trips would typically only occur a few times a week and would not be any different than those presently occurring in the vicinity of the Project Site. As such, vibration impacts associated with operation of the Proposed Project would be less than significant.

- 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. A significant impact may occur if the Proposed Project were located within the vicinity of a private airstrip or within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. There are no airports within a two-mile radius of the Project Site, and the Project Site is not located within any airport land use plan or airport hazard zone. Additionally, the Project Site is not located in the vicinity of a private airstrip. The Proposed Project would not expose people to excessive noise levels associated with airport uses. Therefore, no impact would occur.

Cumulative Impacts

Less Than Significant with Mitigation Incorporated. Development of the Proposed Project in conjunction with the 21 related projects identified in Section 3, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. The Project Applicant has no control over the timing or sequencing of the related projects that have been identified within the Proposed Project study area. While the Proposed Project's potential noise impacts are less than significant following mitigation, it is possible that a proximate related project's noise impacts, when coupled with the noise impacts of the Proposed Project, could result in a cumulatively significant noise impact.

There are three related projects located within 500 feet of the Project Site: Related Project No. 2 (Ford Factory Project), Related Project No. 3 (Amp Lofts Mixed-Use Project), and Related Project No. 15 (District Center Mixed-Use Project). See Figure 3.23, Location of Related Projects, in Section 3, Project Description. Development of Related Project No. 3 is already complete. Related Project No. 2 was only recently proposed and has not begun construction. Related Project No. 15 released a Notice of Preparation for an EIR on February 23, 2018, which is still in the process of preparing the EIR and has not published a Draft EIR. Therefore, it is anticipated that the construction of the Proposed Project would potentially have concurrent construction activities with Related Project No. 2 and 15 (depending if these projects obtains approval). Construction-period noise for the Proposed Project and each related project (that has not yet been built) would be localized. Each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced to the maximum extent feasible. Thus, the cumulative impact associated with construction noise would be mitigated to less than significant levels, and the Project's incremental effects would not be cumulatively considerable.

With respect to cumulative operational noise impacts, each of the related projects would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Nevertheless, the siting and development of related projects would be subject to further CEQA review and evaluated on a case-by-case basis. Thus, the cumulative impact associated with operational noise would be less than significant.

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

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)?

Less Than Significant Impact. A significant impact may occur if the proposed project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. The determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On September 3, 2020, SCAG’s Regional Council adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) - a plan that the Regional Council now calls Connect SoCal. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

Based on the regional growth projections in Connect SoCal, the City of Los Angeles had an estimated permanent population of approximately 3,933,800 persons and approximately 1,367,000 residences in 2016. By the year 2045, SCAG forecasts that the City of Los Angeles will increase to 4,771,300 persons (or a 21% increase since the year 2016) and approximately 1,793,000 residences (or a 31% increase since the year 2016). SCAG’s population and housing projections for the City of Los Angeles, Los Angeles County, and the SCAG region as a whole

residential units. As shown in Table 4.18, the Proposed Project would generate approximately 216 jobs or employees during operations.

While construction of the Proposed Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household’s place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project, which could induce substantial population growth.

As shown in Table 4.18, the Proposed Project would generate approximately 216 jobs or employees during operations. Given that the large workforce available in the Project vicinity and greater urban area, it is anticipated that most of the jobs generated by the Proposed Project would be filled by employees who already reside within the City of Los Angeles or County of Los Angeles. However, while jobs associated with the Proposed Project’s hotel and commercial uses would likely be filled by employees already residing within the vicinity of the Project Site, it is also possible that some of the hotel and commercial jobs would be filled by persons moving into the surrounding area, which could increase the housing demand associated with the Proposed Project. However, it is anticipated that some of this demand would be filled by vacancies in the housing market, and some from other new units in the related projects and nearby developments. Therefore, as the Proposed Project would not directly contribute to population growth in the vicinity of the Project Site and most of the jobs and employees generated by the Proposed Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Proposed Project’s employees who may relocate to the surrounding area would not be substantial. As such, although the Proposed Project may result in indirect population growth with new persons relocating to the City of Los Angeles, any such indirect population growth would be well within SCAG’s population growth projections. As such, this addition of employees would be accounted for and consistent with the SCAG forecasts for the year 2040. As such, the Proposed Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Proposed Project occupancy/buildout that would result in an adverse physical change in the environment or introduce unplanned infrastructure that was not previously evaluated.

**Table 4.18
Projected Employment Growth**

| Land Use | Size | Employees per Average SF ^a | Total Employees |
|--|-----------|---------------------------------------|-----------------|
| Proposed Project | | | |
| Restaurant, Bar, Cafe, Gallery | 15,907 sf | 1 emp / 100 sf | 159 |
| Hotel | 51,708 sf | 1 emp / 917 sf | 57 |
| Total Proposed Project Employees: | | | 216 |
| <i>Notes: sf = square feet; emp = employee</i> ^a <i>Employment rate is based on the generation factor of one employee per 917 sf of lodging space and one employee per 100 sf of high turnover (sit down) restaurant space. Source: U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008. Source: Parker Environmental Consultants, 2019.</i> | | | |

Therefore, the Proposed Project would contribute to approximately 216 new jobs/employees to Central City North CPA. The addition of 216 net jobs/employees would be consistent with SCAG's growth projections for the Los Angeles region. As such, the Proposed Project's population and housing impacts would be less than significant.

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

No Impact. A significant impact may occur if the Proposed Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Proposed Project would consist of the one-story addition to an existing three-story hotel building and the new construction of a new 15-story hotel building. The Project Site is currently occupied by an existing three-story hotel and a surface parking lot. No displacement of existing housing would occur with the Proposed Project. Thus, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional jobs and employment opportunities to the Project Site area. New employment from related projects could also result in population growth if new employees move to the area, resulting in direct and indirect population growth in the Project Site area.

As discussed in response to Checklist Question XIV(a), the Proposed Project would not exceed the growth projections of SCAG's Connect SoCal for the City of Los Angeles subregion. Because the Proposed Project would not displace any residents, and population growth potentially associated with the Proposed Project has already been anticipated per SCAG projections, the Proposed Project's population growth would not be cumulatively considerable. Therefore, the Proposed Project's cumulative impacts to population and housing would be less than significant.

With respect to population growth from permanent employment, jobs in commercial land uses typically do not generate substantial population growth within the region. As such, jobs are generally filled by residents that already reside within close proximity to those jobs. Further, residential neighborhoods would be supportive and complementary to the proposed commercial and residential land uses. As such, the related projects would not generate substantial indirect population growth or demand for new housing, and a less than significant impact would occur.

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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. Section 15382 of the CEQA guidelines defines “significant effect on the environment” as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.” Thus, the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service would only be considered significant if such activities result in a physical adverse impact upon the environment.⁴⁸

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 57.507.3.3, Table 507.3.3, of the 2017 City of Los Angeles Fire Code, the maximum response distance between high density residential land uses and a LAFD fire station that houses an engine company or truck company is 1.5 miles or 2 miles, respectively. If either of these distances were exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

Construction

Construction of the Proposed Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of best management practices (BMPs) for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Proposed

⁴⁸ *City of Hayward et al. v. Board of Trustees of the California State University (2015).*

Project. The BMPs that would be implemented during construction of the Proposed Project would include: keeping mechanical equipment in good operating condition, and as required by law, carefully storing flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site and surrounding vicinity during construction through marked emergency access points approved by the LAFD, construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flag persons would be used to facilitate the traffic flow until construction is complete. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Construction of the Proposed Project would result in a less than significant impact.

Operation

A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service that would result in a physical adverse impact upon the environment.

As indicated above, the City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed or if structures located in the applicable residential area install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Proposed Project is located beyond the maximum response distance. Although the Proposed Project is within the adequate response distance, the Proposed Project would install a fire sprinkler system to ensure safety from any fire hazards that may occur within the building.

The Proposed Project would include the one-story addition of the existing three-story hotel and the construction, use and maintenance of a 15-story hotel building with 103 guest rooms resulting in approximately 67,615 square feet of floor area including approximately 15,907 square feet of commercial space comprised of restaurant, café, bar, and art gallery space, generating a net increase of approximately 216 employees.⁴⁹ The Proposed Project would increase the utilization of the Project Site by adding additional hotel and commercial space. The Proposed Project would potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 17, located at 1601 S. Santa Fe Avenue, which is approximately 0.7 mile (driving distance) south of the Project Site. Based on the response distance criteria

⁴⁹ *The employee generation factors for land uses are taken from: U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*

specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 17 to the Project Site, fire protection response would be considered adequate.

Furthermore, the adequacy of existing water pressure and water availability in the area of the Proposed Project would be verified by the LAFD during the plan check review process. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. Further, the Proposed Project would work with LAFD and incorporate LAFD's recommendations relative to fire safety into the building plans. As part of the Proposed Project, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety, including installation of fire sprinklers, would ensure that any impacts upon fire services created by the Proposed Project would be less than significant.

b) Police protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station that would result in a physical adverse impact upon the environment. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new police station or police substation, if warranted, would only be considered significant if such activities result in a physical adverse impact upon the environment.⁵⁰

The Project Site is currently served by LAPD Central Bureau, which oversees LAPD operations in the Central, Hollenbeck, Newton, and Rampart areas. The Central Community Police Station, located at 251 East 6th Street, approximately 0.9 mile northeast (driving distance) and four minutes without traffic from the Project Site. The Central Community Police Station area is approximately 4.5 square miles, consists of 52 Reporting Districts, and includes the communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Artist Lofts, Olvera Street, Jewelry District, the Convention Center, and the Fashion District. The service boundaries for Central Area are as follows: Stadium Way, Pasadena Freeway (SR-110) to the north, Washington Boulevard, 7th Street to the south, Los Angeles

⁵⁰ *City of Hayward et al. v. Board of Trustees of the California State University (2015).*

River to the east, and the Harbor Freeway (I-110) to the west. Within the Central Division Area, the Proposed Project is located within Reporting District (RD) 159.⁵¹

The Central Community Police Station has approximately 370 sworn personnel and 30 civilian support staff assigned. It is a culturally diverse community with a population of approximately 40,000 people. The officer to resident ratio is: 1 officer to 108 residents in the Central Area. Additionally, there are special service teams available within the LAPD to service Central Area. Central Police Station’s emergency response system is directly linked to the LAPD’s Communications Division’s Dispatch Centers. The Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, and paramedic). The average response time to emergency calls for service in the Central Area during 2018 was 2.8 minutes. The average response time for non-emergency calls for service in Central Area during 2018 was 19.6 minutes.⁵² Table 4.19, Central Area Crime Statistics, provides crime statistics for local Project Site area in the City of Los Angeles.

**Table 4.19
Central Area Crime Statistics**

| Crimes | 2018 | 2017 | 2016 |
|-----------------------------|-------------|-------------|-------------|
| Homicide | 14 | 21 | 11 |
| Rape | 97 | 106 | 90 |
| Robbery | 694 | 720 | 682 |
| Aggravated Assault | 1,072 | 1,189 | 909 |
| Burglary | 349 | 375 | 324 |
| Motor Vehicle Theft | 418 | 395 | 399 |
| Burglary From Motor Vehicle | 1,743 | 1,368 | 1,101 |
| Personal / Other Theft | 2,995 | 2,741 | 2,634 |

Source: LAPD Correspondence Letter, Rendon Hotel Project, June 11, 2019.

Construction

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. As part of the standard condition of approval issued by the Department of Building and Safety, the Applicant will be required to ensure the site is secure and does not pose a nuisance to pedestrians or adjacent property owners during construction. Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction

⁵¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: <http://zimas.lacity.org/>, accessed April 2019.

⁵² Los Angeles Police Department Correspondence Letter, Rendon Hotel Project, June 11, 2019 (Appendix H.3 of this IS/MND).

activity from view at the local street level and to keep unpermitted persons from entering the construction area. As such, with adherence to regulations and project conditions, Project impacts would be less than significant during the construction period.

Operation

The Proposed Project would increase the utilization of the Project Site by adding additional hotel and commercial space. The Proposed Project would potentially increase the demand for LAPD services. The Proposed Project would include the expansion of the existing hotel with 103 guest rooms and approximately 15,907 square feet of commercial space comprised of restaurant, café, bar, and art gallery uses, generating a net increase of approximately 216 employees.⁵³ The development of the Proposed Project would result in an increase of on-site visitors, patrons, and employees to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons may escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials.

Upon completion of the Proposed Project, the Applicant would provide the Central Area Commanding Officer with a diagram of each portion of the Proposed Project. The diagram should include access routes and any additional information that might facilitate police response. The Proposed Project would include adequate and strategically positioned functional and security lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities (Please refer to “Design Out Crime Guidelines: Crime Prevention Through Environmental Design,” published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 West 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000). In addition, the continuous visible and non-visible presence of hotel guests and employees at all times of the day would provide a sense of security during evening and early morning hours. As such, the Proposed Project visitors, patrons, and employees would be able to monitor suspicious activity at the building entry points. With incorporation of the security design features identified in the LAPD’s “Design Out Crime Guidelines: Crime Prevention Through Environmental Design”, which will be confirmed through the Site Plan Review process, the Proposed Project’s potential impact upon LAPD services would be less than significant.

c) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project Site is located in LAUSD Board District 2. The Project Site is currently served by one elementary school, one middle school, and three high schools. Table 4.20, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

⁵³ *The employee generation factor for land uses are taken from: U.S. Green Building Code, Building Area per Employee by Business Type, May 13, 2008.*

**Table 4.20
Resident Schools Serving the Project Site**

| School Name | Grades | Address |
|---|--------|-------------------------------|
| 9 th Street Elementary | K-5 | 835 Stanford Avenue |
| Hollenbeck Middle School | 6-8 | 2510 E 6 th Street |
| Boyle Heights Science Tech Engineering Math High School | 9-12 | 2550 E 6 th Street |
| Theodore Roosevelt Senior High School | 9-12 | 456 S Mathews Street |
| Felicitas and Gonalo Mendez Senior High School | 9-12 | 1200 Plaza Del Sol |

Source: Los Angeles Unified School District, Resident School Identifier, website: <http://rsi.lausd.net/ResidentSchoolIdentifier/>, accessed April 2019.

As shown in Table 4.21, Proposed Project Estimated Student Generation, the Proposed Project would generate approximately 27 elementary students, 7 middle school students and 15 high school students, for a total of approximately 49 students. The Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Proposed Project's demands upon local schools. Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of these school development fees, the Proposed Project's potential impact upon public school services would be less than significant.

**Table 4.21
Proposed Project Estimated Student Generation**

| Land Use ^a | Size | Elementary School Students | Middle School Students | High School Students | Total Students |
|----------------------------------|----------------------|----------------------------|------------------------|----------------------|----------------|
| Proposed Project | | | | | |
| Hotel/Commercial | 216 emp ^a | 27 | 7 | 15 | 49 |
| Total Estimated Students: | | 27 | 7 | 15 | 49 |

Notes: sf = square feet, emp = employee
^a Refer to Section XIV. Population and Housing, of this IS/MND, for calculations of estimated employee generation.
^b It is assumed that 0.2249 students are generated per commercial employee (Table 15 of the 2018 Developer Fee Justification Study). Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school).
Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.

d) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the proposed project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from

the Proposed Project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available.

Parks and recreation facilities within a two-mile radius of the Project Site include: Arts District Park, Gladys Park, Boyle Heights Sports Center, Roosevelt Pool, Pecan Recreation Center, Pecan Pool, Hollenbeck Lake, Hollenbeck Park, Hollenbeck Safe Spot Skate Spot, Hollenbeck Recreation Center, San Julian Park, Ross Valencia Community Park, Spring Street Park, Costello Senior Citizen Center, Ramon Garcia Recreation Center, Lou Costello Jr. Recreation Center, Prospect Park, Evergreen Recreation Center, Costello Pool, Central Park Recreation Center, Central Pool, Los Angeles Plaza Park, State Street Recreation Center, Pershing Square Park, and Trinity Recreation Center. The Proposed Project would provide open space that would reduce the Project's demand upon public parks and recreational facilities.

A significant impact generally occurs if a project includes substantial population growth through residential development that could generate an increased demand in recreational and park facilities. The Proposed Project includes the development of a 15-story hotel building. The Proposed Project would not result in direct population growth since the Proposed Project does not include residential uses. Therefore, the Proposed Project would not cause an increased demand on local parks and recreational facilities by new residents. The Proposed Project is expected to attract site visitors, patrons, and retailers that may increase activity in the surrounding area and surrounding recreation and park facilities. As such, the Proposed Project may result in slightly increased recreation and park use in the Project Site vicinity. Nevertheless, the increased use in recreation and park facilities would be minimal, and a less than significant impact would occur.

e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. Based on the L.A. CEQA Thresholds Guide, the determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include:

- Benjamin Franklin Branch Library, located at 2200 East 1st Street, approximately 1.2 miles northeast of the Project Site;
- Little Tokyo Branch Library, located at 203 South Los Angeles Street, approximately 1.3 miles northwest of the Project Site;

- Central Library, located at 630 West 5th Street, approximately 1.7 miles northwest of the Project Site.

The Proposed Project is anticipated to generate 216 employees and therefore would increase the presence of visitors, patrons, and retailers on-site and in the surrounding area. These persons may utilize surrounding neighborhood library facilities. However, any increases in the use of library facilities caused by the Proposed Project are expected to be minimal, since residents usually utilize local libraries. Moreover, the Central Library and branch libraries currently meet the library demands of the community and are anticipated to be able to meet the Proposed Project's demand for library services, because the LAPL is committed to increase the number of people who use the library services, to increase the number of library card holders and actively promote and robustly market programs and services to increase residents' overall engagement with the libraries. Therefore, the Proposed Project's impacts upon library services would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the residential related projects is projected to generate additional employment, housing, and resident population within the study area, which would likely generate additional demands upon fire protection services, police protection services, schools, parks, and library services. As part of the City's annual budget review process, the City assesses the needs for public services and allocates funds via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. The cumulative impacts upon each of the service providers is addressed below.

Fire

With respect to fire services, the Project, in combination with the related projects, could increase the demand for fire protection services in the LAFD service area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis.

Consistent with *City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) the obligation to provide adequate fire protection services is the responsibility of the City. LAFD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular

budgeting efforts, LAFD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, cumulative impacts upon LAFD services would be less than significant.

Police

With respect to police services, the Proposed Project, in combination with the related projects, would increase the demand for police protection services in the Project Site area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. To help reduce any on-site increase in demand for police services, the Project and related projects would implement comprehensive safety and design features to enhance public safety and reduce the demand for police services. In addition, the Project, as well as the related projects, would generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate. Furthermore, in accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

Consistent with *City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) the obligation to provide adequate police services is the responsibility of the City. LAPD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

Schools

With respect to cumulative impacts upon schools, the Project, in combination with related projects is expected to result in a cumulative increase in the demand for school services within the LAUSD service area. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Proposed Project. However, each of the new developments would be responsible for paying mandatory school fees to mitigate the

increased demand for school services. Cumulative impacts on schools would be less than significant.

Parks

With respect to cumulative impacts upon parks, development of the Project in conjunction with related projects could result in an increase in demands upon parks in the area of the Project Site. However, as a hotel development, the Proposed Project is expected to contribute very little demand upon daytime park use. Additional cumulative development would contribute to lowering the City’s existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with payment of Parks and Recreation Fees. Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Proposed Project and related projects would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

Libraries

With respect to cumulative impacts upon library services, the Proposed Project includes the development of an 15-story hotel building and, thus, would not directly increase residential population in the area. Development of the residential related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City’s Public Library system, Los Angeles voters passed a Library Bond Issue for \$178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program’s inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. Thus, the potential increase in library use generated by the Proposed Project would not make a cumulatively considerable impact upon the City’s library system. Therefore, the cumulative impacts related to library facilities would be considered less than significant.

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"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-----------|
|--|--------------------------------|--|------------------------------|-----------|

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. For the purpose of this Initial Study, a significant impact may occur if the project would include substantial employment or population growth, which would 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. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the proposed project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. As discussed above, the Proposed Project proposes a 15-story hotel building, and thus, would not be adding new residences to the area and would not directly contribute to population growth in the area. The Proposed Project would provide on-site open space for the proposed hotel and commercial uses. The Proposed Project is expected to generate a net increase of 216 jobs and would thus increase the amount of visitors, patrons, and retailers to the Project Site. Any incremental need for open space as a result of the Proposed Project would be expected to be met by the Proposed Project's proposed landscaping and open space areas. As such, the Proposed Project would not be expected to increase demand on the surrounding area and surrounding recreation and park facilities. Any increase in recreation and park facilities use would be minimal, and a less than significant impact would occur.

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. A significant impact may occur if a project includes or requires the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, the Proposed Project does not include a residential component and would not directly result in the increase of residential population in the area. As such, the Proposed Project would not result in a substantial increase of recreational or park use in the area. The Proposed Project itself does not include the expansion of park facilities and does not require the construction or expansion of recreational facilities that might have an adverse impact on the environment. Therefore, a less than significant impact would occur.

Cumulative Impacts

Less Than Significant Impact. The Proposed Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Los Angeles. The related projects that include a residential component would be required to provide on-site open space and pay the Dwelling Unit Construction Tax or Quimby fees to improve recreation and park facilities in the area and to mitigate their impacts upon park and recreational facilities. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. Because the Proposed Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Proposed Project would have a less than significant cumulative impact on such resources.

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 or pedestrian facilities? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)? | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The following section summarizes and incorporates by reference the information provided in the Transportation Assessment for the Proposed Rendon Hotel Project, City of Los Angeles prepared by Crain & Associates, dated April 7, 2020 (“Transportation Assessment”); and the LADOT Correspondence Letter, dated July 9, 2020. The Transportation Assessment and LADOT Correspondence Letter are provided as Appendix G to this IS/MND.

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

Less Than Significant With Mitigation Incorporated. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle, and pedestrian

facilities. In accordance with the City’s Transportation Assessment Guidelines (TAG), dated July 2019, a project that generally conforms with, and does not obstruct the City’s development policies and standards will generally be considered to be consistent. The Transportation Assessment and the LADOT Correspondence Letter concluded that the Proposed Project would support and not preclude the implementation of the City’s goals and policies, and therefore, would not have a significant impact regarding compliance with the City’s plans, ordinance, and policies. The City has recently updated their TAG in July 2020. Table 4.22, below, provides responses to the list of policy related questions, as recommended by LADOT, in order to help determine whether the Proposed Project conflicts with the City’s circulation system policies based on questions in the most recent TAG. As indicated in Table 4.22, the Proposed Project is in conformance with the applicable policies and programs corresponding to the Proposed Project and would not preclude the City’s implementation of any adopted policy and/or program. Therefore, the Proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant.

**Table 4.22
Questions to Determine Project Applicability to Plans, Policies and Programs**

| # | Guiding Questions | Response |
|---|--|--|
| <i>Public Right of Way Classification Standards for Dedications and Improvements</i> | | |
| A.1 | Does the Project include additions or a new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned R3 or less restrictive zone? (screening question) | No. The Project Site fronts 7 th Street and Santa Fe Avenue. Per the Mobility Element 2035, 7 th Street and Santa Fe Avenue are Avenue II roadways and require a 86-foot roadway and 56-foot width right-of-way. The Project Site is zoned M3-1-RIO with a General Plan land use designation of Heavy Industrial and proposed a zone change and land use designation change to C2-2-RIO and Regional Center Commercial, respectively. Thus, the Proposed Project would not include a new construction along an Avenue II roadway on a property zoned R3. |
| A.2 | If A.2 is yes , is the project required to make additional dedications or improvements to the Public Right of Way as demonstrated by the street designation? | No Conflict. The 7th Street right-of-way dimension falls three feet short of the Mobility Plan designation, and Santa Fe Avenue’s roadway and right-of-way dimensions fall 22 feet and 36 feet short, respectively. The LAMC (Section 12.37) stipulates that developers contribute funds to widen sub-standard arterial or collector roadways bordering their development project parcels. Based on consultation with the Department of City Planning, however, roadway widening was not deemed necessary for the Proposed Project, as its development entails the preservation of an existing building. Therefore, no roadway widening or dedications are required for 7 th Street or Santa Fe Avenue adjacent to the Proposed Project. Thus, the Proposed Project would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035. |
| | If the answer is to A.1 or A.2 is NO , then the project does not conflict with the dedication and improvement requirements that are needed to comply with the Mobility Plan 2035 Street Designations and Standard | No Conflict. The Proposed Project would not conflict with dedication and improvement requirements of the Mobility Plan 2035. |

| | | |
|--|---|---|
| | Roadway Dimensions. | |
| Public Right of Way Policy Alignment with Project-Initiated Changes | | |
| B.1 | Does the project physically modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property? | <p>No. The Proposed Project would eliminate an existing vehicular driveway along Santa Fe Avenue and proposes a passenger drop-off/loading area along the side of the AMP Lofts mixed-use building to accommodate the Proposed Project. The drop-off/loading area would require configurations to the curb line, which would shift the sidewalk curb approximately 14 feet from its current alignment. Even though the reconfiguration of the curb line for the passenger loading area may slightly increase the distance that pedestrians travel along the west side of Santa Fe Avenue, it would not create new vehicle/pedestrian or vehicle/bicycle conflicts. By providing a location for Proposed Project guests and patrons to load and unload without impeding through southbound traffic, the loading zone would reduce vehicle/vehicle friction along the site-adjacent segment of Santa Fe Avenue. Thus, the Proposed Project would improve the pedestrian and vehicular safety along the adjacent roadways.</p> <p>The Proposed Project does not propose to significantly modify the curb placement or turning radius and/or physically alter the sidewalk and parkways space that changes how people access a property. These improvements would be implemented in coordination with LADOT, and thus would not conflict with long-term mobility needs identified in the Mobility Plan 2035.</p> |
| B.2 | <p>Does the project add new driveways along a street designated as an Avenue or a Boulevard that conflict with LADOT's Driveway Design Guidelines (See Sec. 321 in the Manual of Policies and Procedures) by any of the following:</p> <ul style="list-style-type: none"> • locating new driveways for residential properties on an Avenue or Boulevard, and access is otherwise possible using an alley or a collector/local street, or • locating new driveways for industrial or commercial properties on an Avenue or Boulevard and access is possible along a collector/local street, or • the total number of new driveways exceeds 1 driveway per every 200 feet along on the Avenue 2 or Boulevard frontage, or • locating new driveways on an Avenue or Boulevard within 150 feet from the intersecting street, or • locating new driveways on a collector or local street within 75 feet from the intersecting street, or • locating new driveways near mid-block crosswalks, requiring | <p>No. The Proposed Project would not include any parking spaces on-site and would eliminate an existing vehicular driveway along Santa Fe Avenue and proposes a passenger drop-off/loading area. Therefore, the Proposed Project would not propose any driveways, and no conflict would occur.</p> |

| | | |
|---|---|--|
| | relocation of the mid-block crosswalk | |
| | If the answer to B.1 and B.2 are both NO , then the project would not conflict with a plan or policies that govern the PROW as a result of the project-initiated changes to the PROW. | No Conflict. The Proposed Project would not conflict with a plan or policies that govern the public right-of-way. |
| <i>Alley, Street and Stairway Access</i> | | |
| C.1.1 | Does the project propose to vacate or otherwise restrict public access to a street, alley, or public stairway? If Yes, will the project provide or maintain public access to people walking and biking on the street, alley or stairway. | No Conflict. Therefore, the Proposed Project does not propose to modify, or restrict public access. As such, no conflict would occur. |
| C.2.1 | Does the project create a cul-de-sac or is the Project Site adjacent to an existing cul-de-sac? If yes, will the cul-de-sac maintain convenient and direct public access to people walking and biking to the adjoining street network? | No Conflict. The Project Site is not located adjacent to a cul-de-sac. As such, no conflict would occur. |
| <i>Parking Supply and Transportation Demand Management</i> | | |
| D.1 | Would the project propose a supply of onsite parking that exceeds the baseline amount as required in the Los Angeles Municipal Code or a Specific plan, whichever requirement prevails? | No. Pursuant to the LAMC, the Proposed Project would be required to provide a total of 56 parking spaces for the hotel and commercial uses. The Applicant is requesting a Variance pursuant to LAMC Section 12.21.A.4 to allow zero on-site parking spaces, but will provide 56 parking spaces off-site through a private agreement. Thus, the Proposed Project would provide the required number of parking spaces, but would not provide parking spaces that exceed the LAMC. |
| D.3 | Would the project provide the minimum on and off-site bicycle parking spaces as required by Section 12.21 A.16 of the LAMC? | Yes. The Proposed Project would provide on-site bicycle parking for short-term and long-term bike storage, as required by LAMC Section 12.21 A.16. The Proposed Project is required to provide a total of 26 bicycle parking spaces on-site (13 short-term and 13 long-term). The Proposed Project would provide the required bicycle parking spaces, as required by the LAMC. Thus, the Proposed Project would conflict with bicycle requirements. |
| D.4 | Does the Project include more than 25,000 square feet of gross floor area construction of new non-residential gross floor? | Yes. The Proposed Project would include a hotel building with commercial space with a total of 67,615 square feet of non-residential floor area. |
| D.5 | If the answer to D.4 is yes , does the project comply with the City's TDM Ordinance in Section 12.26 J of the LAMC? | Yes. Further discussed below under Question XVII(b), the Proposed Project proposes to incorporate additional TDM strategies such as reduced parking supply, transit subsidies, and implement/improve an on-street bicycle facility. Thus, the Proposed Project would comply with the City's TDM Ordinance in LAMC Section 12.26.J. |
| | If the answer to D.3 or D.5 is No , the | No Conflict. The answers to D.3 and D.5 are Yes, |

| | | |
|--|---|--|
| | project conflicts with the LAMC code requirements of bicycle parking and TDM measures. | therefore, the proposed Project would not conflict with LAMC code requirements of bicycle parking and TDM measures. |
| Consistency with Regional Plans | | |
| E.1 | <p>Does the Project or Plan apply one the City's efficiency-based impact thresholds (i.e. VMT per capita, VMT per employee, or VMT per service population) as discussed in Section 2.2.3 of the TAG?</p> <p>If the answer to is yes, does the Project or Plan result in a significant VMT impact?</p> | <p>No Conflict. The Proposed Project applies the LADOT VMT Calculator to determine whether the Proposed Project would result in a significant VMT impact. The VMT Calculator estimates the daily vehicle trips, daily VMT, and daily VMT per employee. Further discussed below under Question XVII(b), the Proposed Project would result in a net increase of 619 net daily trips and 4,174 net daily VMT, which would warrant the preparation of a Transportation Assessment and further VMT analysis.</p> <p>The Proposed Project would generate work VMT per employee of 9.2. Since the Proposed Project is located within the Central APC area, the appropriate threshold of significance with which to compare the Proposed Project's work VMT estimate is 7.6 daily work VMT per employee. Therefore, the Proposed Project is expected to have a significant VMT impact based on its work VMT per employee. The Proposed Project proposes to incorporate additional TDM strategies such as reduced parking supply, transit subsidies, and implement/improve an on-street bicycle facility (refer to Mitigation Measure MM-TR-1, below). With the application of these abovementioned TDM strategies, the Proposed Project would generate 7.4 work household VMT per employee, which falls below the Central APC area threshold of significance of 7.6 daily work VMT per employee. Therefore, the Proposed Project would not be expected to result in significant impacts to the surrounding transportation system with the implementation of TDM strategies.</p> |
| <p><i>Source: Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, Attachment D: Plans, Policies and Programs Consistency Worksheet, July 2020.</i></p> | | |

Construction Impacts

The Proposed Project is anticipated to be constructed over a period of approximately 18 months for completion anticipated in the Year 2024. Most construction activities for the Proposed Project are anticipated to be contained within the Project Site. However, the construction activities may encroach into the parking/buffer lane along Santa Fe Avenue. This construction activity would not require the closure of travel lanes along Santa Fe Avenue, but may require the short-term closure of the sidewalk on the west side of Santa Fe Avenue while the existing driveway is removed. Although the sidewalk closure will block pedestrian access routes along the west side of Santa Fe Avenue, the presence of a sidewalk on the other side of the street and the presence of a crosswalk across Santa Fe Avenue at 7th Street would continue to ensure pedestrian connectivity around the Project Site. The sidewalk along the west side of Santa Fe Avenue would be covered and accessible during all other stages of construction. Additionally, construction activities would not interfere with transit stops and would not limit access to

adjacent properties. Further, there are no existing bicycle facilities adjacent to the Project Site that would be impacted by construction activities.

In addition, the Proposed Project would prepare a Construction Staging and Traffic Management Plan, to be approved by the LADOT. This plan will detail the measures enacted to mitigate traffic impacts during construction related to designated haul routes and staging areas, traffic control procedures, emergency access provisions, and construction crew parking. The Project shall obtain prior LADOT approval for any lane closures, detours, on-street staging areas, or other temporary changes in traffic control due to construction activities and will enact appropriate temporary traffic control procedures. Haul routes for Project construction would be coordinated with the City of Los Angeles Department of Building and Safety (LADBS) to minimize the impact of construction traffic to congested roadways and residential streets. With the implementation of these measures, the Proposed Project construction would not adversely affect the pedestrian, bicycle, transit, and vehicular circulation around the Project Site. Refer to Mitigation Measure MM-TR-1, below. The implementation of the Mitigation Measure MM-TR-1 would mitigate any construction traffic impacts to pedestrian, bicycle, transit, and vehicular circulation to a less than significant level.

Mitigation Measures:

MM-TR-1: Construction Staging and Traffic Management Plan

A detailed Construction Staging and Traffic Management Plan, including street closure information, detour plans, haul routes, and staging plans, would be prepared and submitted to LADOT for review and approval. The Construction Staging and Traffic Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Staging and Traffic Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and should include the following elements as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to ensure traffic safety on public roadways. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag persons).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.

- Prohibition of construction-related vehicles/equipment parking on surrounding public streets.
- Coordination with Metro to address any construction near the rail right-of-way.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.

b) Conflict with or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

Less Than Significant with Mitigation Incorporated. CEQA Guidelines Section 15064.3(b)(1) states that for land use projects, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

Vehicle-Miles-Traveled Analysis

Following the passage of Senate Bill 743 (SB 743), the State of California’s Governor’s Office of Planning and Research (OPR) was tasked with developing new guidelines for evaluating transportation impacts under the California Environmental Quality Act (CEQA). These guidelines were intended to shift the transportation performance metric from automobile delay and LOS to one that would promote the reduction of greenhouse gas emissions and the development of multimodal and diverse transportation networks. As a result, OPR determined that, under the proposed update to the CEQA guidelines, vehicle-miles-traveled (VMT) would be established as the primary metric for evaluating environmental and transportation impacts.

As outlined in the Mobility Plan 2035, the City has a goal of reaching a 20 percent reduction in VMT by 2035. In line with these goals, the City has updated the TAG to ensure compliance with Section 15064.3, subdivision (b)(1) of the CEQA Guidelines, which asks if a development project would result in a substantial increase in VMT. The TAG sets the following criterion for determining significant transportation impacts based on VMT:

For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?

To assist in determining which development projects would conflict with CEQA Guidelines section 15064.3, subdivision (b)(1), the TAG establishes two screening criteria to evaluate whether further analysis of a land use project’s impact based on VMT is required. Both of the following criteria must be met in order to require further analysis of a land use project’s VMT contribution:

1. The land use project would generate a net increase of 250 or more daily vehicle trips.
2. The project would generate a net increase in daily VMT.

In addition, the TAG provides specific instructions for evaluating the VMT contribution of retail and restaurant uses. Should a land use project contain retail or restaurant components that are small-scale or local-serving in nature, the retail/restaurant portion of the land use project can be assumed not to result in a significant VMT impact. The retail/restaurant component of a land use project can be considered small-scale or local-serving if the total retail and restaurant square footage does not exceed 50,000 square feet. For a mixed-use development, if the retail/restaurant component does not exceed 50,000 square feet in size, the retail/restaurant portion of the land use project can be considered to have a less-than-significant VMT impact; however, the remaining portions of the mixed-use development are subject to further VMT analysis if the above two screening criteria are met.

After the initial screening, the TAG provides guidance for further analysis of the VMT contribution of a land use project. Under the updated TAG, two forms of VMT are analyzed: (1) household VMT per capita and (2) work VMT per employee. The household VMT per capita is the home-based VMT produced by the residential component of a land use project divided by the number of residents within the development. The work VMT per employee is the home-based work VMT attracted by the non-residential uses of a land use project divided by the number of employees within the development. As outlined in the TAG, in order for a proposed land use project to have a less-than-significant VMT impact, two criteria must be met: (1) the land use project's household VMT per capita must be at least 15 percent below the average household VMT per capita, and (2) the land use project's work VMT per employee must be at least 15 percent below the average work VMT per employee. The thresholds corresponding to 15 percent below the average household VMT per capita and average work VMT per employee were determined for each of the seven Area Planning Commission (APC) areas within the City and are shown in Table 4.23. The APC area in which a land use project is located determines the appropriate significance thresholds to be applied.

Table 4.23
LADOT Thresholds for Significant VMT Impacts

| Area Planning Commission | Daily Household VMT per Capita | Daily Work VMT per Employee |
|--------------------------|--------------------------------|-----------------------------|
| Central | 6.0 | 7.6 |
| East LA | 7.2 | 12.7 |
| Harbor | 9.2 | 12.3 |
| North Valley | 9.2 | 15.0 |
| South LA | 6.0 | 11.6 |
| South Valley | 9.4 | 11.6 |
| West LA | 7.4 | 11.1 |

Source: Crain and Associates, Transportation Assessment for the Proposed Rendon Hotel Project, City of Los Angeles, April 7, 2020 (see Appendix G to this IS/MND).

Along with the updated TAG, LADOT developed VMT Calculator, which calculates the daily vehicle trips, daily VMT, daily household VMT per capita, and daily work VMT per employee for land use projects. The VMT Calculator utilizes average daily trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Edition, 2012) and empirical trip generation data to determine the base daily trips associated with a land use project. The number of daily trips is further refined using data from the Environmental Protection Agency's (EPA's) Mixed-Use (MXD) Model and the City's Travel Demand Forecasting (TDF) Model.

The VMT Calculator also determines population and employment estimates for a land use project based on rates developed from U.S. Census data for the City of Los Angeles and employment data from a variety of sources, including the Los Angeles Unified School District and the San Diego Association of Governments (SANDAG). The VMT Calculator then uses trip length information from the TDF Model, in combination with the daily trips and population/employment estimates, to calculate the land use project's daily VMT, household VMT per capita, and work VMT per employee. The VMT Calculator also provides a menu of Transportation Demand Management (TDM) strategies that can be implemented for a land use project, either as project features or mitigation measures, to reduce the project's daily vehicle trips and VMT. Further detail on the VMT Calculator can be found in the City of Los Angeles VMT Calculator Documentation (November 2019).

To determine whether the Proposed Project requires further VMT analysis, the Proposed Project's existing and proposed land uses were inputted into the VMT Calculator. As shown in Appendix A of the Transportation Assessment, the Housing (Hotel) land use rates were applied to the corresponding Proposed Project use. As shown, based on the VMT Calculator, the Proposed Project would generate 619 net daily trips and 4,174 net daily VMT. As the Proposed Project would generate more than 250 net daily trips and would result in a net increase in daily VMT, the Proposed Project would meet both screening criteria and further VMT analysis is required.

The VMT Calculator was then utilized to determine the household VMT per capita and the work VMT per employee. The Project proposes to incorporate some of the TDM strategies listed in the VMT Calculator as part of the Proposed Project development, and therefore those measures were considered in the VMT calculation for the Proposed Project. The TDM measures include:

1. Include Bike Parking Per LAMC – The LAMC requires a total of 13 short-term and 13 long-term bicycle parking spaces. The Project proposes to provide the required number of short-term bicycle parking spaces on the ground-floor along Santa Fe Avenue, and the required number of long-term bicycle parking spaces within the Project's basement level.

Since the Proposed Project would not include residential uses, the Proposed Project would not generate household VMT per capita. Thus, the Proposed Project would have a less-than-significant residential VMT impact. With the above-mentioned TDM strategies implemented as part of the Proposed Project, the VMT Calculator determined that the hotel portion of the

Proposed Project would generate work VMT per employee of 9.2, as shown in Table 4.24, below. Since the Proposed Project is located within the Central APC area, the appropriate threshold of significance with which to compare the Proposed Project’s work VMT estimate is 7.6 daily work VMT per employee, as shown in Table 4.24. Therefore, the Proposed Project is expected to have a significant VMT impact based on its work VMT per employee. Thus, additional TDM strategies beyond those included as Proposed Project features were explored to reduce the Project’s daily work VMT per employee (9.2) below the Central APC significance threshold for daily work VMT per employee (7.6). The Proposed Project proposes to incorporate additional TDM strategies such as reduced parking supply, transit subsidies, and implement/improve an on-street bicycle facility (refer to Mitigation Measure MM-TR-1, below).

**Table 4.24
VMT Analysis of Proposed Project With and Without Mitigation**

| Category | Work | | |
|-------------------------------------|--------------------|-------------------------------|--------|
| Scenario | Work VMT Threshold | Project Work VMT per Employee | Impact |
| Proposed Project Without Mitigation | 7.6 | 9.2 | Yes |
| Proposed Project With Mitigation | 7.6 | 7.4 | No |

Source: Crain and Associates, Transportation Assessment for the Proposed Rendon Hotel Project, City of Los Angeles, April 7, 2020 (see Appendix G to this IS/MND).

Applying the three abovementioned TDM strategies, the VMT Calculator determined that the Proposed Project would generate the following with-mitigation trip estimates: 494 daily vehicle trips and 3,343 daily VMT. The report outputs of the VMT Calculator have been included in Appendix A of the Transportation Assessment.

Based on the 3,343 daily VMT, the VMT Calculator determined that the Proposed Project would generate 7.4 work household VMT per employee. This value falls below the Central APC area threshold of significance of 7.6 daily work VMT per employee. Therefore, implementation of Mitigation Measure MM-TR-2 would reduce the Proposed Project’s daily work VMT per employee, and transportation impacts would be less than significant.

Mitigation Measures:

MM-TR-2: Transportation Demand Management (TDM) Strategies

The Proposed Project shall integrate the following additional TDM strategies:

- Reduced Parking Supply – The LAMC, without consideration of parking reduction mechanisms, would require a total of 195 parking spaces. The Project proposes to provide zero on-site parking spaces, which is below the amount of vehicle parking required by direct application of the LAMC.
- Transit Subsidies – The Project will subsidize transit fares for employees of the Project site. The subsidies will be offered to each employee at least once annually for a

minimum of five years. Per the options provided in the VMT Calculator, the Project will provide subsidies equivalent to \$1.49 per employee per day, with 100 percent of employees eligible as part of the subsidy program.

- Implement/Improve On-Street Bicycle Facility – The Project proposes to install short-term bicycle parking along Santa Fe Avenue. Since 7th Street is identified as part of the Bicycle Network in the Mobility Plan 2035, the Project will improve bicycle infrastructure adjacent to this route by providing secure locations for visitors to secure their bicycles while they patronize the Project and nearby uses. This will help to reinforce that the Project and the surrounding area is a bicycle-friendly environment.

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. A significant impact may occur if the Proposed Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions. The Proposed Project would not include unusual or hazardous design features.

The Proposed Project would not introduce new driveways along its frontage on 7th Street and Santa Fe Avenue, and it would eliminate an existing driveway on Santa Fe Avenue. Further, the Proposed Project would not be required to provide dedications along Santa Fe Avenue or 7th Street, as the Proposed Project involves the preservation and adaptive reuse of an existing building. However, the Proposed Project proposes a passenger loading area along southbound Santa Fe Avenue adjacent to and in conjunction with the AMP Lofts mixed-use project. This loading area would require reconfigurations to the curb line.

The proposed passenger drop-off facility along southbound Santa Fe Avenue would shift the sidewalk curb face approximately 14 feet from its current alignment, but would not cause any new breaks in the sidewalk. The AMP Lofts mixed-use project has a proposed commercial use-only driveway that would be located near the northerly end of the loading zone, but this driveway (and its sidewalk break) would exist irrespective of the Proposed Project loading zone. Thus, the Proposed Project loading zone would not in and of itself incorporate any driveways or other facilities that would break up the sidewalk. Even though the reconfiguration of the curb line for the passenger loading area may slightly increase the distance that pedestrians travel along the west side of Santa Fe Avenue, it would not create new vehicle/pedestrian or vehicle/bicycle conflicts. Furthermore, the passenger loading area would provide an area for vehicles to stop outside of the southbound travel lane/shoulder. By providing a location for Proposed Project guests and patrons to load and unload without impeding through southbound traffic, the loading zone would reduce vehicle/vehicle friction along the site-adjacent segment of Santa Fe Avenue. Thus, the Proposed Project would improve the pedestrian and vehicular safety along the adjacent roadways. Therefore, the Proposed Project would have a less than significant impact related to substantially increasing roadway hazards due to geometric design features or incompatible uses.

d) Result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. As previously discussed in Section VIII(g), the Project Site is not located in a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.⁵⁴ Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.⁵⁵ Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Further, the Proposed Project would be developed in a manner that satisfies the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. Furthermore, the Proposed Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Proposed Project would not be expected to result in inadequate emergency access and impacts would be less than significant.

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 |
|--------------------------------|--|------------------------------|-----------|
|--------------------------------|--|------------------------------|-----------|

⁵⁴ Los Angeles County Department of Public Works, *City of Los Angeles Central Area Disaster Route Map, August 13, 2008.*

⁵⁵ *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles, April 1995.*

| | 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" 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)?**

Less Than Significant With Mitigation Incorporated. Public Resources Code Section 21084.2 establishes that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” A project would cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe if such resource 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), or if such resource is 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. Public Resources Code 5024.1(c) states that “[a] resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed in response to Checklist Question V.b (Cultural Resources, Archeological Resources), the Project Site and immediate surrounding areas do not contain any known archaeological resources.⁵⁶ Pursuant to the procedures imposed by AB 52, the Department of City Planning sent pre-consultation request letters on January 4, 2021 to local Native American Tribal representatives who are on file with the Department of City Planning as having requested to be notified of future development projects. The City of Los Angeles received a request for consultation from the Gabrieleño Band of Mission Indians – Kizh Nation, who has claimed that the Project Site falls within their Ancestral Tribal Territory. To date, the City of Los Angeles has not received any additional information from this tribe indicating that the Proposed Project would result in any adverse impacts to tribal cultural resources. Therefore, the AB52 tribal consultation is ongoing at this time.

While there are currently no recorded archaeological sites within the Project Site area, buried resources could potentially be unearthed during project activities. The Proposed Project would include excavation and grading to ensure the proper base and slope for the one-level subterranean basement. Thus, there is a potential for the accidental discovery of unknown and unrecorded archaeological materials, including tribal cultural resources. As such, it is possible that unknown tribal cultural resources could be discovered during construction of the Proposed Project, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. Because the presence or absence of such materials cannot be determined until the site is excavated, periodic monitoring during construction is required to identify any previously unidentified archaeological resources uncovered by Project construction activity. Mitigation Measure MM-CR-1 and MM-GEO-1, described in Section V(b), would be implemented to ensure that if any archaeological resources or tribal cultural resources are encountered during construction, impacts to such resources would be mitigated to a less than significant level.

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?

Less Than Significant With Mitigation Incorporated. The Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. As discussed above, pursuant to the procedures imposed by AB 52, pre-consultation request letters were sent on January 4, 2021 to local Native American Tribal representatives who are on file with the Department of City Planning as having requested to be notified of future

⁵⁶ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

development projects. The City of Los Angeles received a request for consultation from the Gabrieleño Band of Mission Indians – Kizh Nation, who has claimed that the Project Site falls within their Ancestral Tribal Territory. To date, the City of Los Angeles has not received any additional information from this tribe indicating that the Proposed Project would result in any adverse impacts to tribal cultural resources. Therefore, the AB52 tribal consultation is ongoing at this time. Based on the Project Site’s prior soil disturbance and lack of any known Native American resources or cultural or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. Nevertheless, the City will incorporate standard conditions of project approval to address the unlikely discovery of any potential tribal cultural resources. Implementation of Mitigation Measures MM-CR-1 and MM-GEO-1 would ensure impacts associated with the accidental discovery of any Native American tribal resources would be avoided or reduced to less than significant levels. With mitigation, impacts to tribal cultural resources remain less than significant during Project construction.

Cumulative Impacts

As indicated above, the Project Site does not contain any known tribal cultural resources, nor did search results by the Assembly Bill 52 consultation process provide substantial evidence as to the presence of tribal cultural resources on site. Additionally, compliance with standard conditions of approval and regulatory requirements would ensure potential impacts from inadvertent discovery would be reduced to a less-than-significant level. It is unknown whether or not any of the properties on which the related projects are located contain tribal cultural resources. However, similar to the Proposed Project, each of the related projects would be required to follow the regulatory requirements of Assembly Bill 52, as applicable, which includes notifying tribes to solicit consultation and to analyze and mitigate potential impact of tribal cultural resources. Any related project sites that contain tribal cultural resources would be required to comply with conditions of approval and/or site specific mitigation measures to avoid or substantially lessen potential impacts. Therefore, cumulative impacts would be less than significant.

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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|-------------------------------------|--------------------------|
| b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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? | | | | |

Less Than Significant Impact. A significant impact may occur if a project would increase demands upon infrastructure to such a degree that the construction or relocation of facilities currently serving the Project Site would result in significant environmental impacts. The determination of whether a project results in a significant impact on water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities shall be made considering the following factors: (a) the total estimated demand for the project; (b) whether sufficient capacity exists in the infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; and (c) whether improvements or upgrades necessary to serve the project would result in significant environmental impacts.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to

treat approximately 600 million gallons per day (mgd).⁵⁷ In 2017, the LADWP’s water system supplied 4 million customers with nearly 160 billion gallons of treated water, resulting in an average daily water demand of approximately 438 mgd. Therefore, the LAAFP has a remaining capacity of treating approximately 162 mgd, which may fluctuate depending on the season.⁵⁸

Based on correspondence from the LADWP, the Project Site is currently served by an 8-inch water main along Santa Fe Avenue, a 16-inch pipe along the north side of East 7th Street, and a 10-inch pipe along the south side of East 7th Street.⁵⁹ There are no known water deficiencies in the area.⁶⁰

As shown in Table 4.25, the Proposed Project would generate an increase in water demand of approximately 22,244 gallons per day (gpd) of water (or approximately 25 acre feet per year), which is significantly below available capacity. Because the Proposed Project’s employment growth is within SCAG’s forecast, the Proposed Project’s increased water demand would not measurably reduce the LAAFP’s capacity. Therefore, no new or expanded water treatment facilities would be required. With respect to water treatment facilities, the Proposed Project would have a less-than-significant impact.

**Table 4.25
Proposed Project Estimated Water Demand**

| Type of Use | Size | Water Demand Rate (gpd/unit) ^a | Total Water Demand (gpd) |
|---|-----------|---|--------------------------------|
| Proposed Project | | | |
| Hotel | 103 Rooms | 120 gpd/room | 12,360 |
| Bar: Cocktail, Public Table Area | 2,651 sf | 0.72 gpd/sf | 1,909 |
| Restaurant: Full Service Indoor | 218 seat | 30 gpd/seat | 6,540 |
| Restaurant: Take-Out | 4,783 sf | 0.3 gpd/sf | 1,435 |
| Total Project Water Demand | | | 22,244 gpd (25 AFY) |
| <i>Notes: sf =square feet; gpd = gallons per day; AFY = acre feet per year</i> | | | |
| <i>^a Bureau of Sanitation, Sewer Capacity Availability Request (SCAR), 2053 E. 7th Street, April 2, 2019. It is assumed that all water usage would convert to wastewater.</i> | | | |
| <i>Source: Parker Environmental Consultants, 2019.</i> | | | |

Although no further upgrades are anticipated at this time, in the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure

⁵⁷ U.S. Department of Energy, website: <https://betterbuildingsolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization---oxygen-plant-replacement>, accessed April 2019.

⁵⁸ Los Angeles Department of Water and Power, Water, L.A.’s Drinking Water Quality Report, website: <http://www.ladwp.com/>, accessed April 2019.

⁵⁹ City of Los Angeles Department of Water and Power, Correspondence from Charles C. Holloway, Manager of Environmental Planning and Assessment, to Parker Environmental Consultants, dated May 21, 2019 (see Appendix H.2 to this IS/MND).

⁶⁰ *Ibid.*

improvements would be conducted within the right-of-way easements serving the Project Site area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be of a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Therefore, potential impacts resulting from water infrastructure improvements would be less than significant.

Wastewater Treatment Facilities and Existing Infrastructure

A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer’s capacity is already constrained or that would cause a sewer’s capacity to become constrained; or (b) the project’s additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The Los Angeles Bureau of Sanitation (BOS) provides sewer service to the Proposed Project Site area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant (HWRP). The Hyperion Water Reclamation Plant treats an average daily flow of 275 million gallons per day (mgd) on a dry weather day. Because the amount of wastewater entering the HWRP can double on rainy days, the plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 450 mgd and a peak wet weather flow of 800 mgd.⁶¹ This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HWRP. As shown in Table 4.26 below, the Proposed Project would generate approximately 22,244 gpd of wastewater, representing a fraction of one percent of the available capacity.

Based on the Bureau of Sanitation SCAR Letter, the sewer lines serving the Project Site are adequate to serve the Proposed Project.⁶² Through the rules and regulations established in the City of Los Angeles Sewer Allocation Ordinance (Ord. 166,060), the Bureau of Sanitation (BOS) will re-verify the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. If it is later determined that the local sewer system has insufficient capacity to serve the Proposed Project, the Applicant would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate the Proposed Project’s increased flows. Any infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right-of-way. Such construction activities would be localized in nature and would generally involve partial lane

⁶¹ *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, website: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=t4yrq0jkq_4&_afLoop=10780400868530458#!, accessed April 2019.*

⁶² *Bureau of Sanitation, Sewer Capacity Availability Request (SCAR), 2053 E. 7th Street, April 2, 2019 (see Appendix H to this IS/MND).*

closures for a relatively short duration of time typically lasting a few days to a few weeks. Impacts to sewer capacity and infrastructure would be less than significant. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

**Table 4.26
Proposed Project Estimated Wastewater Generation**

| Type of Use | Size | Wastewater Demand Rate (gpd/unit) ^a | Total Wastewater Demand (gpd) |
|--|-----------|--|-------------------------------|
| Proposed Project | | | |
| Hotel | 103 rooms | 120 gpd/room | 12,360 |
| Bar: Cocktail, Public Table Area | 2,651 sf | 0.72 gpd/sf | 1,909 |
| Restaurant: Full Service Indoor | 218 seat | 30 gpd/seat | 6,540 |
| Restaurant: Take-Out | 4,783 sf | 0.3 gpd/sf | 1,435 |
| Total Project Wastewater Generation | | | 22,244 gpd |
| <i>Notes: sf =square feet; gpd = gallons per day</i> ^a Bureau of Sanitation, Sewer Capacity Availability Request (SCAR), 2053 E. 7 th Street, April 2, 2019. Source: Parker Environmental Consultants, 2019. | | | |

Stormwater Drainage Facilities

As described in Question X(c), the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Proposed Project would be required to demonstrate compliance with Low Impact Development (LID) standards and retain or treat the first ¼-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. The Proposed Project Site is currently developed with a three-story hotel building and surface parking. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in response to Checklist Question X.a), the Project shall comply with NPDES requirements and the LID regulations, and implement Best Management Practices (BMPs) during the construction and operation of the Proposed Project.

The appropriate design and application of BMPs devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. Thus, development of the Proposed Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, Project impacts to stormwater drainage facilities would be considered less than significant.

Electricity

The projected increase in electrical demand due to the Proposed Project would not have an adverse impact on its electrical system. Depending on the exact location and size of the requested services (to be determined as site plans are finalized), the Project Applicant may be financially responsible for some infrastructure improvements necessary to serve the Proposed Project (e.g. installation of electric power facilities or service connections or adding a line extension on the public street). New service connections may occasionally result in temporary

disruptions in electrical services for existing customers. However, no outages or short outage is anticipated to occur when hooking up the Proposed Project.

The Project Site is located in a highly urbanized area in the Central City North Community. Based on correspondence with LADWP, dated May 21, 2019 (see Appendix H.2 of this IS/MND), one underground 4.8kV circuit and one overhead 4.8kV circuit are adjacent to the Project Site along East 7th Street. There is another overhead 4.8kV circuit adjacent to the Project Site along South Santa Fe Avenue. One underground 34.5kV circuit is adjacent to the Project Site along East 7th Street. The LADWP has confirmed that there are no existing electricity service problems or deficiencies in the Project area. However, cumulative effect of the Proposed Project and other new and added loads in the area may require near term and/or future additions to distribution system capacity. The Proposed Project would require on-site transformers and may require underground line extension on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project Site area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project Site vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant.

The LADWP has confirmed that the estimated power requirement for the Proposed Project is within the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system. The LADWP's load growth forecast incorporates construction activity and is built into the commercial floor space model. In planning sufficient future resources, the LADWP's Power SLTRP incorporates the estimated power requirement for the Proposed Project through the load forecast input and has planned sufficient resources to supply the electricity needs. Electricity supplies from LADWP are adequate to serve the Proposed Project, and any improvements to existing infrastructure would not be expected to result in any significant secondary environmental effects. Therefore, the Proposed Project impacts to local and regional electricity supplies and existing electrical facilities would be less than significant.

Natural Gas

The Southern California Gas Company manages the pipelines adjacent to the Project Site. If problems/deficiencies were to exist, appropriate actions (e.g. pressure betterments, natural gas supplies) would need to be initiated to solve problems. It is anticipated that SoCalGas would be able to meet the natural gas demands of the proposed Project; however, a natural gas survey of equipment would be completed to identify if the current infrastructure would sustain the demand for the proposed Project. Further, since natural gas supplies vary with time, the Southern California Gas Company's ability to accommodate Proposed Project's demand for natural gas supplies can only be evaluated when the Proposed Project is approved.

Since the Proposed Project is located in an area already served by existing natural gas infrastructure, the Proposed Project would not require extensive infrastructure improvement to

serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Proposed Project. The Proposed Project would, however, require local infrastructure improvements to connect to the existing infrastructure serving the Project area. “Hooking-up” disruptions cannot be determined until the actual natural gas demand is known. However, impacts associated with utility upgrades or additional connections would be temporary in nature and would not require new supply facilities.

As estimated above, the Proposed Project’s net natural gas demands are estimated to be approximately 1,621,410 kBTU per year or approximately 1,588,982 million cf per year. The natural gas consumption of 1.6 million cubic feet per year would represent a very small fraction of one percent of SoCalGas’ existing natural gas storage capacity and therefore, would be well within SoCalGas’ existing natural gas storage capacity of 112.5 billion cubic feet as of 2018. The operation of the Proposed Project would not result in the increase in demand for natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities. Therefore, the proposed Project would result in a less than significant impact to natural gas infrastructure capacity.

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

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. The determination of whether the Proposed Project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City’s water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD’s member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG’s RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to reduce the City’s water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table 4.25, the Proposed Project’s net increase for water demand would be 22,244 gallons per day. Through the 2015 UWMP, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040, with implementation of conservation strategies and proper supply management. Accordingly, the Proposed Project’s anticipated water demand has been accounted for and would not exceed the water demand estimates of the City’s 2015 UWMP. Thus, the Proposed Project would have a less-than-significant impact on water demand.

In addition, high efficiency water closets, high efficiency urinals, water saving showerheads, and low flow faucets must be installed in new construction. The flow rates of new plumbing fixtures must comply with the most stringent of the following: Los Angeles City Ordinance No. 184248, Los Angeles Ordinance No. 184,692, the 2017 Los Angeles Plumbing Code, the 2019 California Green Building Standards Code (CAL Green) and the 2017 Los Angeles Green Building Code. With respect to landscaping, the Proposed Project would be required to comply with Los Angeles City Ordinance No. 170978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

The City of Los Angeles has enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance. Compliance with the regulatory compliance measures identified above would reduce the Proposed Project’s demands for potable water resources to a less than significant level.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project, related projects and the cumulative growth throughout the City of Los Angeles, would further increase the demand for potable water within the City of Los Angeles. Through the 2015 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City of Los Angeles through the year 2040, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD’s member agencies. MWD’s demographic projections use data reported in SCAG’s RTP/SCS. As discussed previously in Section XIV, Population and Housing, the Proposed Project’s population and employment growth is consistent with SCAG’s growth projections for the City of Los Angeles subregion. As such, the additional water demands generated by the Proposed Project are accounted for in the 2015 Urban Water Management Plan.

- 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?**

Less Than Significant Impact. A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. As stated in Checklist Question XIX(b), above, the sewage flow will ultimately be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Proposed Project.⁶³ Therefore, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase regional demands on HWRP's capacity.

Local Wastewater Generation

Similar to the Proposed Project, each related project would be required to submit a SCAR and obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since the Proposed Project would require approval from the Bureau of Sanitation, signifying that the sewer lines serving the Project Site have adequate capacity, the Proposed Project would not be expected to contribute to a local cumulative impact. Locally, the Proposed Project would not be cumulatively considerable.

Regional Wastewater Generation

The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City of Los Angeles and surrounding area. However, it is anticipated that the 175 mgd of available capacity in the HWRP would not be significantly reduced with the cumulative wastewater generation from the related projects and Proposed Project. As such, cumulative impacts with respect to wastewater demand would be less than significant.

- 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?**

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be made considering the following

⁶³ *City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Treatment Plant, website: <https://www.lacitysan.org>, accessed April 2019.*

factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), or the Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030.⁶⁴ State law (AB 341) currently requires at least 50% solid waste diversion and establishes a state-wide goal of not less than 75% of solid waste generated to be source reduced, recycled, or composted by the year 2020. As of 2012, the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.⁶⁵

Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multi-family solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

In 2017, the City of Los Angeles entered into exclusive franchise agreements with waste haulers to provide solid waste, commingled recyclables, and organics collection, transfer, disposal, and processing services to commercial and multi-family establishments in the City. The companies that were awarded the contract for each franchise secured a dedicated waste

⁶⁴ *City of Los Angeles, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015.*

⁶⁵ *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

stream, increasing the financial viability to develop new organic waste processing and conversion technology facilities in the vicinity of the City of Los Angeles. The Project Site is located within the Downtown Commercial Waste Franchise Zone, which is serviced under contract to NASA Services, Inc. Under the existing contract, the service provider is required to deliver solid waste resources collected to the following certified facilities: Central Los Angeles Recycling and Transfer Station (CLARTS), located at 2201 East Washington Boulevard; and Puente Hills Material Recovery Facilities, located at 2808 South Workman Mill Road. All solid waste is initially disposed into these two recycling and transfer facilities. Then all trash and non-recyclables materials are transferred to a landfill that accepts non-recyclable waste. It is assumed that the Proposed Project's solid waste would be disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 69.8 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 18 years.⁶⁶

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. Based on the calculations provided in Table 4.27, it is estimated that the proposed construction activities would generate approximately 266 tons of debris during the demolition and construction process that would be exported to a landfill located within the City. In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, the Applicant's contractor would be required to obtain an AB 939 Compliance Permit from the Bureau of Sanitation certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility.

As shown in Table 4.28, below, Estimated Operational Solid Waste Generation, the Proposed Project's net increase in solid waste generation during operation of the Proposed Project would be 1,880 pounds per day or approximately 343 tons per year. However, this estimate is conservative, as it does not factor in any recycling or waste diversion programs. The Proposed Project's solid waste would be handled by private waste collection services. The amount of solid waste generated by the Proposed Project is within the available capacities at area landfills and Project impacts to regional landfill capacity would be less than significant. In compliance with AB 341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

⁶⁶ *County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, September 2020.*

**Table 4.27
Estimated Construction and Demolition Debris**

| Construction Activity | Size | Rate ^a | Generated Waste (tons) |
|---|-----------------------|-------------------|------------------------|
| Demolition | | | |
| Surface Asphalt | 5,500 sf ^b | 2,400 lbs/cy | 122 |
| Construction | | | |
| Hotel | 51,708 sf | 4.38 lbs/sf | 113 |
| Commercial | 15,907 sf | 3.89 lbs/sf | 31 |
| Total Debris: | | | 266 |
| <i>Notes: sf= square feet; cy = cubic yards</i> ^a USEPA Report No EPA530-98-010, <i>Characterization of Building Related Construction and Demolition Debris in the United States</i> , July 1998. ^b It is estimated that approximately 5,500 sf of paved asphalt with a ½-foot depth encompasses the portion of the Project Site to be demolished. Source: Parker Environmental Consultants, 2020. | | | |

**Table 4.28
Estimated Operational Solid Waste Generation**

| Type of Use | Size ^b | Solid Waste Generation Rate ^a (lbs/unit/day) | Total Solid Waste Generated (lbs/day) |
|---|-------------------|---|---------------------------------------|
| Proposed Project | | | |
| Commercial (15,907 sf) | 159 | 10.53 lbs/employee/day | 1,674 |
| Hotel | 103 | 2.0 lbs/room/day | 206 |
| Total Project Solid Waste Generation: | | | 1,880 |
| <i>Notes: sf = square feet</i> ^a Includes all materials discarded, whether or not they are later recycled or disposed of in a landfill. ^b The employee generation factor for land uses are taken from U.S. Green Building Code, <i>Building Area per Employee by Business Type</i> , May 13, 2008. Source: Parker Environmental Consultants, 2020. | | | |

The Proposed Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure and is within the available capacities of area landfills. Therefore, the Proposed Project's impacts to solid waste generation would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the

development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, 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 “blueprint” of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services. Mandatory recycling of organic waste is the next step toward achieving California’s recycling and greenhouse gas emission goals. Organic waste such as green materials and food materials are recyclable through composting and mulching, and through anaerobic digestion, which can produce renewable energy and fuel. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant and no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Proposed Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City of Los Angeles. Based on the 2019 Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the countywide cumulative need for Class III landfill disposal capacity of approximately 154.3 million tons in the year 2032 will exceed the 2019 remaining permitted Class III landfill capacity of

148.4 million tons.⁶⁷ However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the Countywide Integrated Waste Management Plan – Los Angeles County – Countywide Summary Plan and Citing Element (adopted December 2016) demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

Furthermore, it should be noted that the City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG’s regional population growth projections. The growth associated with Proposed Project is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City’s SRRE.

As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.⁶⁸ Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Thus, the Proposed Project’s contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Moreover, as with the Proposed Project, other related projects would participate in regional source reduction and recycling programs significantly reducing the amount of solid waste deposited in area landfills. Therefore, the Proposed Project’s contribution to cumulative solid waste impacts would be less than cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant.

⁶⁷ *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020.*

⁶⁸ *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" type="checkbox"/> |

Responses a through d: No Impact. A potential significant impact upon wildfire hazards could occur if the Project Site were to be located on state responsibility areas or lands classified as very high fire hazard severity zones. Lands subject to this provision have been designated by the City of Los Angeles Fire Department pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code. The Very High Fire Hazard Severity Zone (VHFHSZ) was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The Proposed Project Site is not located within a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, this checklist question is not applicable to the Proposed Project and no impact would occur.

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 type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input checked="" 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?

Less Than Significant with Mitigation Incorporated. A significant impact would occur only if the Proposed Project results in potentially significant impacts for any of the above issues. The Proposed Project is located in a densely populated urban area and would have no unmitigated significant impacts with respect to biological resources or California’s history or pre-history. As noted in the analysis above, the site is developed with a commercial hotel and surface parking lot and does not support any substantial habitat of a fish or wildlife species. Vegetation on the site is limited to ornamental trees within and surrounding the parking lot. Compliance with standard regulatory compliance measures would reduce potential impacts upon migratory bird species associated with the proposed tree removals, should construction commence during the breeding season.

Additionally, although no known direct impacts to archaeological resources are anticipated, implementation of Mitigation Measure MM-CR-1 would ensure that any impacts upon cultural resources are mitigated to a less than significant level in the unlikely event any such archaeological materials are accidentally discovered during the construction process.

With respect to paleontological resources, excavations that extend down below five feet may encounter significant fossil vertebrate specimens. Any substantial excavations below the uppermost layers in the area of the Proposed Project, therefore, should be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. With adherence to regulatory compliance measures and Mitigation Measure MM-GEO-1, any impacts to paleontological resources would be mitigated to a less-than-significant level. Therefore, with mitigation and adherence to regulatory compliance measures, the Proposed Project would not have the potential to degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history.

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)?

Less Than Significant Impact. A significant impact may occur if the Proposed Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. As concluded in the cumulative impact analysis provided under each Checklist Question above, the Proposed Project’s incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, tribal cultural resources, utilities, and wildland fire hazards would be less than significant. As such, the Proposed Project’s contribution to cumulative impacts would be less than significant.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Proposed Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Proposed Project would not have significant environmental effects on human beings, either directly or indirectly after mitigation. Thus, with mitigation, any potentially significant impacts to humans would be less than significant.

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2. Acronyms and Abbreviations

| | |
|-----------------|--|
| AAM | Annual Arithmetic Mean |
| AB | Assembly Bill |
| ACM | Asbestos-containing materials |
| AEP | Association of Environmental Professionals |
| AFY | Acre-feet per year |
| APN | Assessor Parcel Number |
| AQMP | Air Quality Management Plan |
| ASTM | American Society of Testing and Materials |
| ASTs | above-ground storage tanks |
| ATCS | Adaptive Traffic Control System |
| Basin | South Coast Air Basin |
| BMPs | Best Management Practices |
| C/D | construction/demolition |
| CAA | Clean Air Act |
| CAAQS | California ambient air quality standards |
| Caltrans | California Department of Transportation |
| Cal/EPA | California Environmental Protection Agency |
| CAPCOA | California Air Pollution Control Officers Association |
| CARB | California Air Resources Board |
| CAT | Climate Action Team |
| CBC | California Building Code (2007) |
| CCAA | California Clean Air Act |
| CCAR | California Climate Action Registry |
| CCR | California Code of Regulations |
| CDFW | California Department of Fish and Wildlife |
| CDMG | California Division of Mines and Geology |
| CEC | California Energy Commission |
| CEQA | California Environmental Quality Act |
| CERCLIS | Comprehensive Environmental Response, Compensation, and Liability Information System |
| Cf | Cubic feet |
| CFC | Chlorofluorocarbons |
| CGS | California Geological Survey |
| CH ₄ | Methane |
| CHMIRS | California Hazardous Material Incident Report System |

| | |
|-------------------|--|
| CiSWMPP | City of Los Angeles Solid Waste Management Policy Plan |
| CIWMA | California Integrated Waste Management Act |
| CLARTS | Central Los Angeles Refuse Transfer Station |
| CMP | Congestion Management Plan |
| CNEL | Community Noise Exposure Level |
| CO | carbon monoxide |
| CO ₂ | carbon dioxide |
| CO ₂ e | carbon dioxide equivalent |
| COHb | carboxyhemoglobin |
| COPC | Chemical of Potential Concern |
| CORRACTS | Corrective Action Treatment, Storage, and Disposal Facilities |
| CPA | Community Plan Area |
| CPT | cone penetrometer test |
| CPU | Crime Prevention Unit |
| CRA/LA | Community Redevelopment Agency of the City of Los Angeles |
| CUP | conditional use permit |
| CWA | Clean Water Act |
| CWC | California Water Code |
| cy | cubic yards |
| dB | decibel |
| dBA | A-weighted decibel scale |
| d/D | flow level |
| DHS | California Department of Health and Services |
| DOGGR | California Department of Conservation Division of Oil, Gas, and Geothermal Resources |
| DWP | Department of Water and Power |
| DWR | California Department of Water Resources |
| du | dwelling unit |
| EIR | Environmental Impact Report |
| EMS | Emergency Medical Service |
| EOO | Emergency Operations Organization |
| EPA | Environmental Protection Agency |
| ERNS | Emergency Response Notification System |
| EZ | Los Angeles State Enterprise Zone |
| FAR | Floor Area Ratio |
| FCAA | Federal Clean Air Act |
| FEMA | Federal Emergency Management Agency |
| FHWA | Federal Highway Administration |
| FTIP | Federal Transportation Improvement Program |
| GBCI | Green Building Certification Institute |
| GHG | greenhouse gas |
| gpd | gallons per day |
| gpm | gallons per minute |
| GWP | Global Warming Potential |
| HFC | hydrofluorocarbons |
| HQTA | High-Quality Transit Areas |
| HSA | Hyperion Service Area |
| HTP | Hyperion Treatment Plant |
| HVAC | Heating, Ventilation and Air Conditioning |
| I-101 | Hollywood Freeway |
| ISO | Interim Control Ordinance |
| ITE | Institute of Transportation Engineers |
| km | kilometers |

| | |
|------------------|---|
| kV | kilovolt |
| kWh | kilowatt-hours |
| LAA | Los Angeles Aqueduct |
| LAAFP | Los Angeles Aqueduct Filtration Plant |
| LABC | City of Los Angeles Building Code |
| LABS | Los Angeles Department of Public Works Bureau of Sanitation |
| LADBS | Los Angeles Department of Building and Safety |
| LADOT | Los Angeles Department of Transportation |
| LADRP | Los Angeles Department of Recreation and Parks |
| LADWP | Los Angeles Department of Water and Power |
| LAFD | Los Angeles Fire Department |
| LAMC | Los Angeles Municipal Code |
| LAPD | Los Angeles Police Department |
| LAPL | Los Angeles Public Library |
| LARWQCB | Los Angeles Regional Water Quality Control Board |
| LAUSD | Los Angeles Unified School District |
| LBP | Lead-based paint |
| lbs/day | pounds per day |
| LCFS | Low Carbon Fuel Standard |
| L _{dn} | day-night average noise level |
| LEED | Leadership in Energy and Environmental Design |
| L _{eq} | equivalent energy noise level/ambient noise level |
| LID | Low Impact Development |
| LOS | Level of Service |
| LST | localized significance thresholds |
| LUST | leaking underground storage tank |
| LUTP | Land Use/Transportation Policy |
| MBTA | Migratory Bird Treaty Act |
| MCE | Maximum Considered Earthquake |
| MEP | maximum extent practicable |
| MERV | Minimum Efficiency Reporting Value |
| Metro | Los Angeles County Metropolitan Transit Authority |
| mgd | million gallons per day |
| mi | miles |
| MPO | Metropolitan Planning Organization |
| MS4 | medium and large municipal separate storm sewer systems |
| msl | mean sea level |
| mm | millimeters |
| M _{max} | maximum moment magnitude |
| MTA | Metropolitan Transportation Authority |
| MWD | Metropolitan Water District |
| MWh | Mega-Watt hours |
| N ₂ O | nitrous oxide |
| NAAQS | National ambient air quality standards |
| NAHC | Native American Heritage Commission |
| NFRAP | No Further Remedial Action Planned Sites |
| NO ₂ | nitrogen dioxide |
| NOP | Notice of Preparation |
| NOx | nitrogen oxides |
| NPDES | National Pollutant Discharge Elimination System |
| NPL | National Priorities List |
| O ₃ | Ozone |
| OAL | California Office of Administrative Law |

| | |
|-------------------|--|
| OPR | Office of Planning and Research |
| Pb | lead |
| PCB | polychlorinated biphenyl |
| PCE | tetrachloroethylene |
| PEC | Potential environmental concern |
| PFC | perfluorocarbons |
| PGA | peak horizontal ground acceleration |
| PM | particulate matter |
| PM ₁₀ | respirable particulate matter |
| PM _{2.5} | fine particulate matter |
| ppd | pounds per day |
| ppm | parts per million |
| PSI | pounds per square inch |
| PUC | Public Utilities Commission (also see CPUC) |
| PWS | Public water suppliers |
| RCP | Regional Comprehensive Plan |
| RCPG | Regional Comprehensive Plan and Guide |
| RCRA | Resource Conservation Recovery Act |
| RD | Reporting District |
| REC | Recognized Environmental Condition |
| ROG | Reactive Organic Gases |
| ROWD | Report of Waste Discharge |
| RTP | Regional Transportation Plan |
| RTP/SCS | Regional Transportation/Sustainable Communities Strategy |
| RWQCB | Regional Water Quality Control Board |
| SB | Senate Bill |
| SCAB | South Coast Air Basin |
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SCG | Southern California Gas Company |
| SCH | State Clearinghouse |
| sf | square feet |
| SF ₆ | sulfur hexafluoride |
| SIP | State Implementation Plan |
| SLIC | Spills, Leaks, Investigation and Cleanup |
| SO ₂ | sulfur dioxide |
| SO ₄ | sulfates |
| SOx | sulfur oxides |
| SOPA | Society of Professional Archeologist |
| SPT | Standard Penetration Test |
| SR-110 | Harbor Freeway |
| SRA | source receptor area |
| SRRE | Source Reduction and Recycling Element |
| SUSMP | Standard Urban Storm Water Mitigation Plan |
| SWAT | Solid Waste Assessment Test |
| SWF/LF | Solid Waste Information System |
| SWFP | Solid Waste Facility Permit |
| SWMP | Stormwater Management Plan |
| SWMPP | Solid Waste Management Policy Plan |
| SWP | State Water Project |
| SWPPP | Storm Water Pollution Prevention Plan |
| SWRCB | State Water Resource Control Board |
| TAC | Toxic Air Contaminants |

| | |
|-------------------|---|
| TCM | transportation control measures |
| TDM | Transportation Demand Management Plan |
| TFAR | Transfer of Floor Area Rights |
| TIA | Traffic Impact Assessment |
| TOD | Transit Oriented District |
| TPH | total petroleum hydrocarbons |
| TSD | Treatment, Storage, and Disposal |
| TSP | Transportation Specific Plan |
| ULSD | Ultra Low Sulfur Diesel |
| US-101 | Hollywood Freeway |
| U.S.EPA | United States Environmental Protection Agency |
| USFWS | United States Fish and Wildlife Service |
| USGBC | United States Green Building Council |
| USGS | U.S. Geological Survey |
| UST | underground storage tank |
| UWMP | Urban Water Management Plan |
| V/C | Volume-to-Capacity |
| VCP | Voluntary Cleanup Plan |
| VdB | Vibration decibels |
| VHFHSZ | Very High Fire Hazard Severity Zone |
| VMT | Vehicle Miles Traveled |
| VOC | Volatile Organic Compound |
| VRF | Variable Refrigerant Flow Air-conditioning |
| WE | Water Efficiency |
| WMA | Watershed Management Area |
| WMUDS | Waste Management Unit Database System |
| WSA | Water Supply Assessment |
| µg/m ³ | micrograms per cubic meter |
| ZIMAS | Zoning Information and Map Access System |