

I. Executive Summary

1. Introduction

The purpose of this Draft Environmental Impact Report (EIR) is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the Morrison Project (Project).

The Project is located at 1220 – 1246 Hope Street and 427 – 435 Pico Boulevard (Project Site) in the City of Los Angeles (City). The Project Site consists of approximately 56,325 square feet (1.29 acres), and is bound by a commercial industrial building to the north, an alleyway to the east, Pico Boulevard to the south, and Hope Street to the west. The Project Applicant is Morrison Hotel, LLC and Morrison Residential, LLC (Applicant).

The Project would demolish the existing commercial industrial buildings (approximately 32,550 square feet) and surface parking lot. The existing 46,626-square-foot, 111-unit single-resident occupancy (SRO) Morrison Hotel (Existing Hotel) would be partially rehabilitated, partially demolished and reconstructed, and expanded on the east side by approximately 174,481 square feet (Hotel Expansion). The Project also would construct an approximately 186,155-square-foot, hotel/residential building (Hotel/Residential Tower) to the north of the Existing Hotel.

The Existing Hotel currently fronts along Hope Street with three wings extending east, resulting in a building that appears in the shape of an “E” if seen from above. The rehabilitation of the Existing Hotel would include demolishing the approximately 12,280-square-foot inner wing to create a courtyard, creating a “C”-shaped building through removal of the inner wing. The Existing Hotel would be partially rehabilitated to provide 29,187 square feet of hotel uses and 5,155 square feet of ground floor restaurant uses. The Existing Hotel would be expanded with the Hotel Expansion, which would provide 165,800 square feet of hotel uses, a 2,838-square-foot rooftop restaurant and bar, and a 5,843-square-foot museum.

The Hotel/Residential Tower would include 150,366 square feet of residential uses above 32,997 square feet of hotel uses and a 2,792-square-foot ground-floor restaurant. The total floor area of the Project would be approximately 420,303 square feet, for a Floor Area Ratio (FAR) of 7.5:1, with 136 dwelling units and 444 guest rooms. The Project includes 233 parking spaces to be located within three subterranean levels. A detailed description of the Project is provided in **Section II, Project Description**, of this Draft EIR.

The Project will require certain discretionary approvals by the City and other governmental agencies. Therefore, the Project is subject to environmental review requirements under the

California Environmental Quality Act (CEQA).¹ The City of Los Angeles Department of City Planning is the Lead Agency under CEQA for the Project.

2. Purpose of the Draft EIR

As described in Section 15121(a) and 15362 of the *State CEQA Guidelines*,² an EIR is an informational document that informs public agency decision-makers and the public of any potential significant environmental effects of a project, identifies possible ways to minimize the significant effects, and describes reasonable alternatives to the project. Thus, the purpose of this EIR is to focus the discussion on those potential environmental effects of the Project that the Lead Agency has determined could be significant. In addition, where applicable, feasible mitigation measures are recommended that could reduce or avoid the significant environmental impacts of the Project.

This Draft EIR was prepared in accordance with Section 15151 of the *State CEQA Guidelines*, which defines the standards for EIR adequacy as follows:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

This document analyzes the environmental effects of the Project to the degree of specificity appropriate to the actions by the Project, as required under Section 15146 of the State CEQA Guidelines. This analysis considers the actions associated with the Project to determine the short-term and long-term effects associated with their implementation. This EIR discusses both the direct and indirect impacts of this Project, as well as the cumulative impacts associated with other past, present, and reasonably foreseeable future projects. CEQA requires the preparation of an objective, full disclosure document to inform agency decision-makers and the general public of the direct and indirect environmental effects of the proposed action, including mitigation measures and reasonable alternatives that can reduce or eliminate any identified significant adverse effects.

3. EIR Scoping Process

In compliance with the State CEQA Guidelines, the City has taken steps to provide opportunities for public participation in the environmental process. During the preparation of the Draft EIR, the City contacted various Federal, State, regional, and local government agencies and other interested parties to inform the public of the Project and to solicit comments on the scope of

¹ *Public Resources Code Sections 21000-21177.*

² *California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387.*

environmental review. As further described below, this included the distribution and noticing of an Initial Study and Notice of Preparation (NOP).

a) Initial Study and Notice of Preparation

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project, and comments from identified responsible and trustee agencies, as well as interested parties on the scope of the EIR, were solicited through a Notice of Preparation (NOP) process. The NOP for the EIR was circulated for a 30-day review period starting on April 12, 2019, and ending on May 13, 2019. Refer to Appendix A to this Draft EIR for a copy of the Initial Study and NOP, and written comments in response to the NOP.

b) Environmental Issues Assessed in Draft EIR

Based on the Initial Study, this Draft EIR includes analyses of the following environmental impact areas:

- Air Quality;
- Cultural Resources (historic and archeological resources);
- Energy
- Geology and Soils (paleontological);
- Greenhouse Gas Emissions
- Hydrology and Water Quality;
- Land Use and Planning;
- Noise;
- Population and Housing;
- Public Services;
- Transportation;
- Tribal Cultural Resources; and
- Utilities and Service Systems.

Based on the Initial Study, issues for which no significant impacts are anticipated as a result of project implementation include aesthetics; agriculture and forestry; air quality (odors); biological resources; cultural resources (human remains); geology and soils (fault rupture, seismic ground

shaking, liquefaction, landslides, erosion/loss of topsoil, expansive soil, and septic tanks); hazards; hydrology and water quality (violation of water quality standards, soil erosion, flooding, and storm drain drainage systems); land use and planning (community division); mineral resources; noise (airport/airstrip); public services (schools and parks); transportation (design features); utilities and service systems (solid waste and regulations); and wildfires. These environmental topics are discussed in Chapter V, Other CEQA Considerations, of this Draft EIR. See also the Initial Study in **Appendix A** of this Draft EIR.

Therefore, no further environmental review of these issues in the Draft EIR is necessary.

c) NOP Comments

Table I-1, Summary of NOP Comments, is a matrix of organizations/persons that provided written comments on the NOP to the City of Los Angeles Department of City Planning, which also indicates the issue areas on which each organization/person commented. A summary of the written comments received in response to the NOP follows:

Agencies and Organizations

- 1. State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (SCH):** A copy of the letter that SCH transmitted to reviewing agencies for comment on the Project's NOP was provided to the City as Lead Agency. No substantial comments to be addressed in EIR analysis.
- 2. State of California, Department of Transportation (Caltrans) District 7:** Caltrans requests a detailed Traffic Impact Study (TIS) of the associated state facilities on Interstate 10 (I-10) and State Route 110 (SR-110), including Traffic Analysis and Queuing Analysis for the associated SR-110/I-10 freeway interchange intersections under Caltrans jurisdiction. Caltrans also requesting cumulative trips to state facilities and any nearby projects that will affect the state facilities. Caltrans is requesting for the intersection analysis, to use the actual traffic signal timing verses signal timing optimization, which is not as accurate. Due to the high-level of earth-moving activities, Caltrans is recommending construction vehicles to be covered when hauling dirt/sediment and supports requests to reduce the amount of parking required and that a Transportation Demand Management (TDM) program be implemented as part of the Project. Such TDM measures could include providing bicycle parking in accordance with the City's Bicycle Parking Ordinance while reducing the amount of car parking. Additionally, Caltrans recommends that large-size construction trucks are limited to off-peak commute periods.
- 3. South Coast Air Quality Management District (SCAQMD):** The SCAQMD recommends that the Lead Agency use their CEQA Air Quality Handbook (1993) when preparing the air quality analysis for the EIR. They request that all air quality modeling files be sent to them. The SCAQMD explains the methodology and analyses that they expect to see in the EIR air quality analysis. They suggest guidance for developing mitigation measures, alternatives to the Project, and their role as a responsible agency.

- 4. Native American Heritage Commission (NAHC):** The NAHC explains the tribal consultation requirements under Assembly Bill 52 and Senate Bill 18. They also suggest mitigation measures that could be used to reduce impacts, if needed. In addition, they discuss the requirements for an archaeological resources survey and recommend mitigation measures if needed.
- 5. State of California, Department of Toxic Substances Control (DTSC):** DTSC requests that the Project identify current and past uses of the site for any release of hazardous materials or contamination as well as plans for investigation and/or remediation if applicable, including following regulatory compliance measures if contaminated soil is encountered during construction.

Individuals

- 6. Eric V. Izaguirre:** Mr. Izaguirre is concerned about construction traffic impacts, including access to his residence and noise impacts.

**Table I-1
Summary of NOP Comments**

NOTICE OF PREPARATION SUMMARY OF COMMENTS Morrison Project		Subject and Draft EIR Section														Explanation of "Other"		
		II. Project Description	IV.A. Air Quality	IV.B. Cultural Resources	IV.C. Energy	IV.D. Geology and Soils	IV.E. Greenhouse Gas Emissions	IV.F. Hydrology and Water Quality	IV.G. Land Use and Planning	IV.H. Noise	IV.I. Population and Housing	IV.J. Public Services	IV.K. Transportation	IV.L. Tribal Cultural Resources	IV.M. Utilities and Service Systems		V. Other CEQA Considerations	VI. Alternatives to the Project
State and Regional Agencies and Departments																		
1	State Clearinghouse Governor's Office of Planning and Research, State Clearinghouse and Planning Unit																•	SCH provided the Lead Agency a copy of the letter transmitted to reviewing agencies for their comment on the NOP.
2	State of California, Department of Transportation District 7											•						
3	South Coast Air Quality Management District		•			•										•		
4	Native American Heritage Commission			•								•						
5	State of California, Department of Toxic Substances Control														•			
Organizations and Individuals																		
6	Eric V. Izaguirre								•			•						

4. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant unavoidable impact has been identified. These areas may include on-site construction noise, on- and off-site vibration during Project construction, and construction- and operation-related traffic intersection effects. There were also several comments related to other environmental issues provided to the City in response to the NOP. Based on the NOP comment letters provided in **Appendix A** of this Draft EIR, issues known to be of concern included, but were not limited to, Project impacts on aesthetics, air quality, cultural resources, greenhouse gas emissions, noise, traffic, and tribal cultural resources. Refer to **Appendix A** of this Draft EIR for copies of the NOP comment letters.

5. Public Review of the Draft EIR

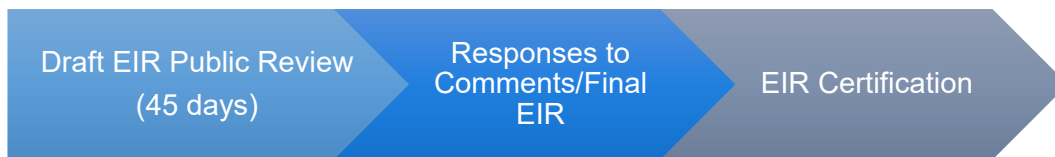
The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 calendar days. In compliance with the provision of Sections 15085(a) and 15087(a)(1) of the State CEQA Guidelines, the City, serving as the Lead Agency: (1) published a Notice of Completion and Availability (NOCA) of a Draft EIR which indicated that the Draft EIR was available for review at the City's Planning Department (Environmental Analysis Section, 221 N. Figueroa Street, Room 1350, Los Angeles, CA 90012); (2) provided copies of the NOCA and Draft EIR to the Los Angeles Central Library, Little Tokyo Branch Library, and the Chinatown Branch Library; (3) posted the NOCA and the Draft EIR on the City's website (<https://planning.lacity.org/development-services/eir>); (4) prepared and transmitted a Notice of Completion (NOC) to the State Clearinghouse; (5) sent a NOCA to all property owners and occupants within 500 feet of the Project Site; and (6) sent a NOCA to the last known name and address of all organizations and individuals who previously requested such notice in writing or attended public meetings about the Project. Proof of publication is available at the City. The public review period commenced on Thursday, March 10, 2022, and will end on Monday, April 25, 2022, for a total of 45 days.

Comments must be submitted via mail and/or e-mail to the following address prior to the end of the public review period:

Erin Strellich
City of Los Angeles Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
Email: erin.strellich@lacity.org
Case Number: ENV-2018-2294-EIR

Upon the close of the public review period, the City will proceed to evaluate and prepare responses to all relevant oral and written comments received from public agencies and other interested parties during the public review period. A Final EIR will then be prepared. The Final EIR will consist of the Draft EIR, possible revisions to the Draft EIR, comments submitted by responsible agencies or reviewing parties during the public circulation period for the Draft EIR,

and City responses to those comments. After the Final EIR is completed and at least 10 days prior to its certification, as required by CEQA, responses to comments made by public agencies on the Draft EIR will be provided to the commenting agencies (CEQA Statute Section 21092.5(a)).



a) Organization of the EIR

This Draft EIR is organized into nine sections as follows:

- **Section I, Executive Summary:** This section provides summary of the Project description, an introduction to the CEQA environmental review process and focus, areas of controversy, a summary of alternatives to the Project, and a summary table of environmental impacts, project design, and mitigation measures.
- **Section II, Project Description:** This section provides a complete detailed description of the Project including the Project location, objectives, characteristics, alternatives and anticipated public agency actions.
- **Section III, Environmental Setting:** This section provides an overview of the study area's environmental setting including a description of existing and surrounding land uses, and a list of the Related Projects in the Project area that form the basis of the cumulative analyses in Section IV.
- **Section IV, Environmental Impact Analysis:** This section is the primary focus of this Draft EIR. Each environmental issue area contains a discussion of existing conditions for the Project area, an assessment and discussion of the significance of impacts associated with the Project, an assessment of cumulative impacts, an identification of project design features and mitigation measures (where applicable), and a discussion of level of impact significance after mitigation.
- **Section V, Other CEQA Considerations:** This section provides a summary of significant and unavoidable impacts of the Project, reasons why the Project is being proposed, a discussion of potential growth inducing effects of the Project, significant irreversible environmental changes, potentially secondary effects of mitigation measures, and effects found not to be significant.
- **Section VI, Alternatives to the Project:** This section includes an assessment of a reasonable range of alternatives to the Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the proposed project and to avoid or substantially lessen any of the significant effects of the Project.

- Section VII, References: This section provides a list of references used in this Draft EIR.
- Section VIII, Acronyms and Abbreviations: This section provides definitions for all of the acronyms and abbreviations used in this Draft EIR.
- Section IX, Preparers of the EIR and Persons Consulted: This section presents a list of City agencies and other agencies and consultant team members that contributed to the preparation of this Draft EIR.

6. Alternatives

This Draft EIR considers a range of alternatives to the Project to allow for informed decision-making in accordance with *State CEQA Guidelines* Section 15126.6. Alternatives to the Project are identified for the purpose of substantially reducing or avoiding the significant impacts of the Project. Two alternatives were considered and rejected as being infeasible for the proposed Project: an alternative project site and alternative onsite uses. The alternatives analyzed in Section VI of this Draft EIR as summarized in the following discussion.

a) Alternative 1 – No Project Alternative

CEQA requires the alternatives analysis to include a No Project Alternative. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the Project with the impacts of not approving the Project (*State CEQA Guidelines* Section 15126.6(e)(1)). Pursuant to *State CEQA Guidelines* Section 15126.6(e)(2):

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans, and consistent with available infrastructure and community services.

b) Alternative 2 – Reduced Density Alternative

Alternative 2 would involve the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the adaptive reuse and expansion of an existing 46,626-square-foot, 111-unit SRO Existing Hotel, and construction of a Hotel/Residential Tower. The total floor area of Alternative 2 would be approximately 337,956 square feet, with 104 dwelling units and 284 guest rooms. Alternative 2 would include 165 parking spaces to be located within three subterranean levels up to 36 feet in depth. Similar to the Project, the parking entry ramp would be accessed via the covered entry from Hope Street. The subterranean levels would also include some hotel and residential back-of-house and storage uses and an immersive museum. Alternative 2 would reduce the total floor area of development by approximately 20 percent, resulting in a 6:1 Floor Area Ratio (FAR).

c) Alternative 3 – Morrison Preservation Alternative— Hotel Use

Alternative 3 would involve the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the rehabilitation of the existing 46,626-square-foot, 111-unit SRO Existing Hotel for continued use as hotel space, expansion of the Existing Hotel to incorporate new hotel uses, and construction of a Hotel/Residential Tower. The total floor area of Alternative 3 would be the same as under the Project, approximately 420,303 square feet, with 136 dwelling units and 444 guest rooms. Alternative 3 would include four subterranean levels under the Hotel/Residential Tower up to 48 feet in depth, three of which would include 250 parking spaces. There would be no subterranean parking under the Existing Hotel. Similar to the Project, the parking entry ramp would be accessed via the entry from Hope Street. The subterranean levels would also include some hotel and residential back-of-house and storage uses. As with the Project, Alternative 3 would result in a FAR of 7.5:1.

d) Alternative 4 – Morrison Preservation Alternative— Office Use

Alternative 4 would involve the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the change of use of the existing 46,626-square-foot, 111-unit SRO Existing Hotel as office space, expansion of the Existing Hotel to incorporate new hotel uses, and construction of a Hotel/Residential Tower. The total floor area and number of residential dwelling units proposed under Alternative 4 would be the same as under the Project, approximately 420,303 square feet with 136 dwelling units, however, due to the elimination of hotel uses from the Existing Hotel, only 270 hotel guest rooms would be developed under Alternative 4. Alternative 4 would include four subterranean levels under the Hotel/Residential Tower up to 48 feet in depth, three of which would include 258 parking spaces. There would be no subterranean parking under the Existing Hotel. Similar to the Project, the parking entry ramp would be accessed via the entry from Hope Street. The subterranean levels would also include some hotel and residential back-of-house and storage uses. As with the Project, Alternative 4 would result in a FAR of 7.5:1.

e) Alternative 5 – DTLA 2040-Compliant Alternative

Alternative 5 would involve the demolition of approximately 32,550 square feet of existing commercial industrial buildings, the adaptive reuse and expansion of an existing 46,626-square-foot, 111-unit SRO Existing Hotel, and construction of a Hotel/Residential Tower consistent with the development regulations allowed under the draft Central City Community Plan Update/DTLA 2040. The draft Central City Community Plan Update/DTLA 2040 designation for the site permits multi-family housing, hotel, commercial office, general retail, restaurants, bars, and theaters and allows for a base range FAR from 7:1 up to 13:1 depending on the proposed uses and the inclusion of certain community benefits.

The total floor area of Alternative 5 would be approximately 477,671 square feet, with 159 dwelling units and 518 guest rooms. As allowed under the draft Central City Community Plan Update/DTLA 2040, Alternative 5 would not provide onsite parking. Therefore, Alternative 5 would reduce the amount of excavation required by the Project for subterranean parking. All hotel and residential back-of-house and storage uses and the immersive museum would be located above ground. Alternative 5 would increase the total floor area of development by approximately 14 percent, resulting in a FAR of 8.75:1.

7. Summary of Environmental Impacts

This section provides a summary of impacts associated with the Project, Project Design Features (PDF) that would be included as part of the Project, Mitigation Measures (MM) that are proposed for potentially significant impacts, and the level of impact after implementation of mitigation measures for each environmental topic evaluated in the Draft EIR, in **Table I-2**.

Table I-2
Summary of Project Impacts

Environmental Issue	MMs and PDFs	Project Impacts
A. AIR QUALITY		
Consistency with Applicable Air Quality Plans	None	Less Than Significant Impact
Increase Criteria Pollutants Under Air Quality Standards	None	Less Than Significant Impact
Expose Sensitive Receptors to Localized Emissions	PDF TR-1	Less Than Significant Impact
Objectionable Odors	None	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
B. CULTURAL RESOURCES		
Historical Resources	MM-CUL-1	Significant Unavoidable
Archaeological Resources	MM CUL-2 MM CUL-3	Less Than Significant with Mitigation Incorporated
Human Remains	None	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
C. ENERGY		
Wasteful, Inefficient or Unnecessary Energy Consumption	None	Less Than Significant Impact
Conflict with State or Local Plans	None	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
D. GEOLOGY AND SOILS		
Surface Rupture	None	Less Than Significant Impact
Ground Shaking	None	Less Than Significant Impact
Liquefaction	None	Less Than Significant Impact
Landslides	None	Less Than Significant Impact
Soil Erosions or Loss of Topsoil	None	Less Than Significant Impact
Lateral Spreading, Subsidence, and Collapse	None	Less Than Significant Impact
Expansive Soils	None	Less Than Significant Impact

**Table I-2
Summary of Project Impacts**

Environmental Issue	MMs and PDFs	Project Impacts
Septic Tanks	None	Less Than Significant Impact
Paleontological Resources	MM GEO-1	Less Than Significant with Mitigation Incorporated
Cumulative Impacts	None	Less Than Significant Impact
E. GREENHOUSE GAS EMISSIONS		
Indirect or Direct GHG Emissions	PDF GHG-1	Less Than Significant Impact
Consistency with Plans, Policies, or Regulations	PDF GHG-1	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
F. HYDROLOGY AND WATER QUALITY		
Water Quality Standards	None	Less Than Significant Impact
Groundwater Supplies	None	Less Than Significant Impact
Drainage Patterns-Erosion or Siltation	None	Less Than Significant Impact
Drainage Patterns-Flooding	None	Less Than Significant Impact
Polluted Runoff	None	Less Than Significant Impact
Drainage Patterns	None	No Impact
Inundation	None	No Impact
Water Control Plan/Sustainable Groundwater Plan	None	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
G. LAND USE AND PLANNING		
Divide a Community	None	No Impact
Consistency with Land Use Plans, Policies, and Regulations	None	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
H. NOISE		
Excessive Noise	PDF NOI-1 PDF NOI-2 PDF NOI-3 MM NOI-1 MM NOI-2	Significant Unavoidable
Excessive Groundborne Vibration	MM NOI-3 MM NOI-4	Significant Unavoidable
Private Airstrip or Airport Land Use Plan	None	No Impact
Cumulative Impacts	None	Significant Unavoidable
I. POPULATION AND HOUSING		
Population Growth	None	Less Than Significant Impact
Displace Substantial Number Existing Housing Units	None	Less Than Significant Impact
Displace Substantial Numbers of People	None	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
J. PUBLIC SERVICES		
Fire Protection	None	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
Police Protection	PDF POL-1	Less Than Significant Impact

**Table I-2
Summary of Project Impacts**

Environmental Issue	MMs and PDFs	Project Impacts
	PDF POL-2 PDF POL-3	
Cumulative Impacts	None	Less Than Significant Impact
Libraries	None	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
K. TRANSPORTATION		
Consistency with Program, Plans, Ordinance and Policy Addressing Circulation System	None	Less Than Significant Impact
Consistency with <i>State CEQA Guidelines</i> Section 15064.3 subdivision (b)	None	Less Than Significant Impact
Geometric Design Feature	None	No Impact
Emergency Access	PDF TR-1	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
L. TRIBAL CULTURAL RESOURCES		
Tribal Cultural Resources	None	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
M. UTILITIES AND SERVICE SYSTEMS		
Water Supply and Infrastructure	PDF WAT-1 PDF WAT-2 PDF WAT-3 PDF WAT-4	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
Wastewater Infrastructure and Capacity	None	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact
Solid Waste-Landfill Capacity	None	Less Than Significant Impact
Solid Waste-Statues and Regulations	None	No Impact
Cumulative Impacts	None	Less Than Significant Impact
Dry Utilities	PDF EPNGTI-1	Less Than Significant Impact
Cumulative Impacts	None	Less Than Significant Impact

Source: EcoTierra Consulting, 2021.

a) Project Design Features

The following project design features are applicable to the Project:

(1) Greenhouse Gas Emissions

PDF GHG-1: The design of the new buildings shall incorporate the following sustainability features:

- Incorporate energy-saving technologies and components to reduce the Project's electrical use profile. Examples of these components include the use of light-emitting diode (LED) and other efficient lighting technology, energy saving lighting control systems

such as light- and motion-detection controls (where applicable), and energy efficient heating, ventilation, and air conditioning (HVAC) equipment.

- HVAC mechanical systems and building lighting shall be controlled with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.
- Demand control ventilation shall be utilized in HVAC systems, and refrigerants in HVAC equipment shall have low GHG emission rates. In particular, the HVAC system shall be designed to optimize exterior and interior air-flow to ensure healthy indoor air quality.

In addition, as part of the Project, the Applicant would incorporate project features to further support and promote environmental sustainability. The sustainability features to be incorporated into the Project would include, but would not be limited to the following: photovoltaic cells; electric vehicle charging stations (discussed further below); material recycling stations; highly efficient HVAC systems; energy-efficient wall insulation and glazing units; WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star–labeled appliances; and water-efficient landscape design (i.e., grouping plants according to their water needs, use of native and low-water plants, etc.). The Project would comply with all applicable State and local regulatory requirements, including the provisions set forth in the City’s Green Building Ordinance. The Project would comply with the City’s EV charging requirements which specifies that 10 percent of new parking spaces would require EV charging equipment. In addition, 30 percent of all new parking spaces would be required to be EV “ready” which will be capable of supporting future EV charging equipment.

(2) Noise

PDF-NOI-1: Project construction will not include the use of impact driven pile systems (i.e., pile drivers).

PDF-NOI-2: All construction equipment will utilize shielding, mufflers and other devices to minimize noise levels. All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

PDF-NOI-3: All outdoor mechanical equipment will be enclosed or screened from off-site noise-sensitive receptors.

(3) Public Services-Police Protection

PDF POL-1: During construction, the Project shall implement a Work Area Plan that will involve temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting and locked entry (e.g., padlock gates or guard restricted access) to limit access by the general public. Regular and multiple security patrols

during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.

PDF POL-2: Prior to the issuance of a building permit, the Project applicant shall submit Project plans to LAPD for review and incorporate the recommended crime prevention features. Specifically, the Project shall:

- Provide 24-hour on-site security personnel whose duties shall include but not be limited to the following:
 - Monitoring entrances and exits;
 - Managing and monitoring fire/life/safety systems; and
 - Controlling and monitoring activities in the parking facilities.
- Provide secured building access/design to residential areas (electronic keys specific to each user);
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points and parking areas;
- Maintaining all security camera footage for at least 30 days, and providing such footage to LAPD as needed;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking area and access points;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from the building, to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed “dead zones.”

PDF POL-3: Prior to the issuance of a demolition permit, the Applicant or its successor shall develop an Emergency Procedures Plan to address emergency concerns and practices for each construction phase and ongoing during operations. The plan

shall include access routes, gate access codes, and any additional information required to facilitate potential LAPD response to the Project Site and shall be subject to review by LAPD.

(4) Transportation

PDF TR-1: A Construction Staging and Traffic Management Plan shall be developed by the Applicant and approved by the Los Angeles Department of Transportation prior to issuance of building permits. The Construction Staging and Traffic Management Plan will formalize how construction will be carried out and identify specific actions that will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. The Construction Staging and Traffic Management Plan shall facilitate traffic and pedestrian movement and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Staging and Traffic Management Plan shall include, but not be limited to, the following:

- Construction workers will be prohibited from parking on adjacent streets and construction workers will be directed to park on-site or at an off-site location.
- The bulk of the work will be conducted on-site. However, if temporary lane closures are needed, Street Services approval would be required to route vehicular traffic, bicyclists, and pedestrians around any such closures. These closures would be limited to the non-peak commute hours of 9:00 AM to 4:00 PM.
- Deliveries of construction material will be coordinated with non-peak commute hours, to the extent possible.
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

(5) Utilities and Service Systems–Water

PDF WAT-1: The Project design shall incorporate the following water conservation fixtures in addition to those measures required by the City’s current codes and ordinances:

- Energy Star Certified Residential Clothes Washers with Integrated Water Factor less than or equal to 4.1 for capacity less than or equal to 2.5 cubic feet, less than or equal to 3.1 for front-loading and capacity greater than 2.5 cubic feet, and less than or equal to 4.1 for top-loading and capacity greater than 2.5 cubic feet.

- Energy Star Certified Residential Dishwashers with gallons per cycle less than or equal to 3.47 for standard and less than or equal to 3.0 for compact.
- High Efficiency Toilets with a flush volume of 1.0 gallons per flush or less (less than the current 1.28 gallons per flush code requirement).
- Showerheads with a flow rate of 1.5 gallons per minute (gpm) or less (less than the current 1.8 gpm code requirement).

PDF WAT-2: The Project design shall incorporate the following landscape and irrigation features in addition to those measures required by the City's current codes and ordinances:

- California Friendly plants or native plants shall be used as needed.
- Drip/Subsurface Irrigation (Micro-Irrigation)
- Drought tolerant "No Mow Fescue" shall be uses as needed.
- Micro-Spray.
- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).

PDF WAT-3: The Project design shall incorporate the following pool features in addition to those measures required by the City's current codes and ordinances:

- Install a meter on the pool make-up line so water can be monitored and leaks can be identified and repaired.
- Pool/Spa recirculating filtration equipment.
- Water-Saving Pool Filter.

PDF WAT-4: The Project design shall incorporate the following utility features in addition to those measures required by the City's current codes and ordinances:

- Domestic Water Heating System located in close proximity to point(s) of use.
- Individual metering and billing for water use for every residential dwelling unit and commercial unit.

PDF EPNGTI-1: Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators will be used during construction.

b) Mitigation Measures

The following mitigation measures are applicable to the Project:

(1) Cultural Resources

MM CUL-1 The Project Applicant or its successor shall conduct the following activities to document the existing Morrison Hotel, ensure Project design that reduces historic resource impacts, and monitor Project construction to preserve character defining features.

Historic American Building Survey.

Prior to demolition and commencement of construction, Historic American Building Survey (HABS) Level II recordation shall be prepared. This documentation shall be prepared by a professional photographer with experience in large format photography and a qualified architectural historian or historic architect who meets the Secretary of the Interior's Professional Qualification Standards. Documentation shall include a written narrative based primarily on information contained in this report and in the 2018 HRTR. Documentation shall record the existing appearance of the building in large format photographic negatives and contact prints. Exterior views of the building, representative interior spaces, character-defining features, as well as setting and contextual views shall be documented. The original archivally-sound documentation shall be submitted to the National Park Service acceptance and transmittal to the Library of Congress for entry into the HABS collection.

Design Review.

The Project Applicant or its successor shall retain a qualified professional historic architect meeting the Secretary of the Interior's Professional Qualification Standards to participate in design collaboration with the project team through preparation of construction documents and issuance of building permits to reduce but not eliminate historical resources impacts. The historic architect monitor shall prepare a memo to be incorporated in the construction documents summarizing treatments to the historical resource and its character-defining features. This work shall be guided by the Secretary of the Interior's Standards to ensure the proper treatment to the character-defining features of the historical resource though the proposed project may not fully conform.

Building Materials Conservation

The Project Applicant or its successor shall retain a qualified building materials conservator to advise on treatments to character-defining features. The building materials conservator shall consult with the general contractor, specialty contractors, and historic architect monitor as necessary prior to demolition and

throughout the course of construction to completion. All materials treatments to existing character-defining features including rehabilitation and restoration in general, as well as reconstruction of the inset tiled entrance, shall be guided by the building materials conservator. This work shall be guided by the Secretary of the Interior's Standards and the American Institute for Conservation Code of Ethics and Guidelines for Practice.

Construction Monitoring

Once building permits for the Project have been issued, the Project Applicant or its successor shall retain a qualified historic architect to participate from preconstruction coordination to construction monitoring during demolition, excavation, and all construction phases to issuance of a permanent certificate of occupancy. The historic architect monitor shall prepare written, photographic, and illustrated documentation in a series of monthly construction monitoring reports or memos. If the Existing Hotel and its associated character-defining features are damaged or may be potentially damaged by any particular construction related activity, the historic architect monitor shall prescribe corrective measures, including halting construction in situations where such activities would imminently endanger the historical resource or its character-defining features. This work shall be guided by the Secretary of the Interior's Standards.

MM CUL-2 The Applicant or its successor shall retain a Qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Qualified Archaeologist) shall be retained by the Applicant or its successor prior to the approval of demolition or grading permits. The Qualified Archaeologist shall provide technical and compliance oversight of all work as it relates to archaeological resources.

The Qualified Archaeologist shall conduct construction worker archaeological resources sensitivity training prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of archaeological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Archaeologist demonstrating that the appropriate construction personnel attended the training.

The Qualified Archaeologist shall perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the Qualified Archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated.

MM CUL-3 In the event of an unanticipated discovery of archaeological materials, the contractor shall immediately cease all work activities in the area (within approximately 50 feet) of the discovery. The discovery shall be evaluated by the Qualified Archaeologist.

If it is determined that the discovered archaeological resource constitutes a historical resource or unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Treatment Plan (Plan) shall be prepared and implemented by the Qualified Archaeologist in consultation with the City of Los Angeles. The City of Los Angeles shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered. The Plan shall include provisions for the recovery and analysis of important data, reporting, and curation at an appropriate accredited facility. If a resource is determined to be a unique archaeological resource as defined in Section 21083.1(g), the provisions of Section 21083.2(b) shall apply.

Construction shall not resume until the Qualified Archaeologist has conferred with the City of Los Angeles on the significance of the resource and the recommendations made by the Qualified Archaeologist have been implemented to the reasonable satisfaction of the archaeologist.

(2) Geology and Soils

MM GEO-1 A Qualified Paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards shall be retained by the Applicant or its Successor prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered.

The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Paleontologist demonstrating that the appropriate construction personnel attended the training.

The Qualified Paleontologist shall conduct an initial spot-check once excavations extend beyond five feet below the surface to determine when and where paleontological monitoring shall be required. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting SVP standards) under the direction of the Qualified Paleontologist. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries.

In the event that paleontological resources (sites, features, artifacts, or fossilized remains) are exposed during construction activities, the City of Los Angeles Department of Building and Safety shall be notified immediately and all work shall cease within a 50-foot radius of the discovery. The Qualified Paleontologist shall determine whether additional study shall be warranted. Construction activity may continue unimpeded on other portions of the Project Site. Personnel of the Project shall not collect or move any paleontological materials and associated materials. The found deposits shall be treated in accordance with Federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.

The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report which shall be submitted to the appropriate repository and the City.

(3) Noise

MM NOI-1 During all Project Site construction phases on-site, construction contractors shall utilize enclosures/acoustical tents and/or sound barriers (as appropriate) that shall achieve a minimum of 11 dBA reduction in construction noise. The sound barriers need to be at least 15-feet in height, solid without holes or cracks. Openings in the temporary barriers for access would be necessary, but should be placed in a manner that does not interrupt the solid barrier between the noise source and the affected sensitive receptor(s).

MM NOI-2 Prior to operating outdoor amplified music and entertainment speakers on the 5th floor Amenity Terrace, an acoustical design plan shall be submitted to the City, shown to result in a composite noise level of no more than 104 dBA_{leq} (94 dBA_{leq} on or before 10 PM) at a distance of 10 feet from the edge of the building. The composite noise level is defined as the sound level resulting from the amplification of recorded or live music combined with simultaneous spoken word (i.e., D.J.) emanating from all speakers in use, and excluding noise from guests and the normal operation of the amenities lounge, food and beverage service. To achieve this performance level, the acoustical design plan shall rely on, among other strategies and technologies, the following:

- Directional speakers or arrays of smaller speakers shall be used so as to maximize on-site sound levels while minimizing the spread of sound beyond the Amenity Terrace perimeter.
- Within the outdoor seating areas of the Amenity Terrace, speakers shall be generally directed towards the interior of the property. Sound from all speakers shall be directed below the top of the railing (if necessary, downward tilted at an appropriate angle). All ceiling-mounted speakers shall be oriented directly downward towards the floor.
- The areas shall be designed with the strategic use of materials with high sound absorption properties within the Amenity Terrace area and shall avoid using highly sound- reflective surfaces, to the extent possible, at the Amenity Terrace.
- The use of amplified speakers for recorded or live music performances shall be limited to up to 2:00 A.M and noise levels must be reduced by at least 10 dBA on or before 10 PM.
- All disc jockeys (DJs) and musicians shall utilize the on-site sound system. The DJs and musicians shall use speakers set at or below pre-approved settings and in predetermined speaker locations and directions.

MM NOI-3 During all Project Site construction, vibratory rollers and/or any other equivalent vibratory equipment shall not be utilized within 136 feet, and large bulldozers shall not be used within 80 feet of the façades of closest residential/mixed-use buildings ([R1] E on Grand Apartments located 20 feet to the east, [R2], Onyx, directly across West Pico Boulevard; and [R3], Hope and Flower, across South Hope Street located approximately 50 feet to the west and south respectively).

MM NOI-4 During all Project Site construction, vibratory rollers and/or any other equivalent vibratory equipment shall not be utilized within 20 feet, and large bulldozers shall not be used within 12 feet of the façade of the adjacent industrial building to the north of the site.