

III. Revisions, Clarifications, and Corrections to the Draft EIR

This section of the Final EIR provides changes to the Draft EIR that have been made to revise, clarify, or correct the environmental impact analysis for the 676 Mateo Street Project (Project). Such changes are the result of proposed refinements to the Project proposed by the Applicant, public and agency comments received in response to the Draft EIR, and/or additional information that has become available since publication of the Draft EIR. The changes described in this section do not result in any new significant environmental impacts or a substantial increase in any significant impacts identified in the Draft EIR.

This section is divided into two parts: **Section III.A, Corrections and Additions to the Draft EIR Sections and Appendices**; and **Section III.B, Effect of Corrections and Revisions**.

A. Corrections and Additions to the Draft EIR Sections and Appendices

Changes have been made to the Draft EIR as a result of public and agency comments received in response to the Draft EIR and/or new information that has become available since publication of the Draft EIR. Deletions are shown in strikethrough text and additions are shown in underlined text. Such changes are presented in this EIR Section.

Executive Summary

No corrections or additions have been made to this section of the Draft EIR.

I. Introduction

No corrections or additions have been made to this section of the Draft EIR.

II. Project Description

Section II, Project Description, page II-36, under g) Site Operation and Security, revise the paragraph as follows:

“Given the live/work uses on the Project Site, the Project would operate 24 hours per day. Business hours for commercial operations would likely be within the range of 6:00 AM to 2:00 AM, depending on the requirements of the individual commercial use. The Project would provide security features including, but not limited to, controlled access to live/work areas, and video surveillance. Noise associated with the ground level and Level 2 amenity space would consist primarily of people talking which would be generally consistent with the existing pedestrian-oriented environment along Mateo Street. While amplified speech and amplified music would be permitted, these sources are subject to the City’s noise

regulations. No amplified music or amplified speech would be permitted between the hours of 9 p.m. and 8 a.m.”

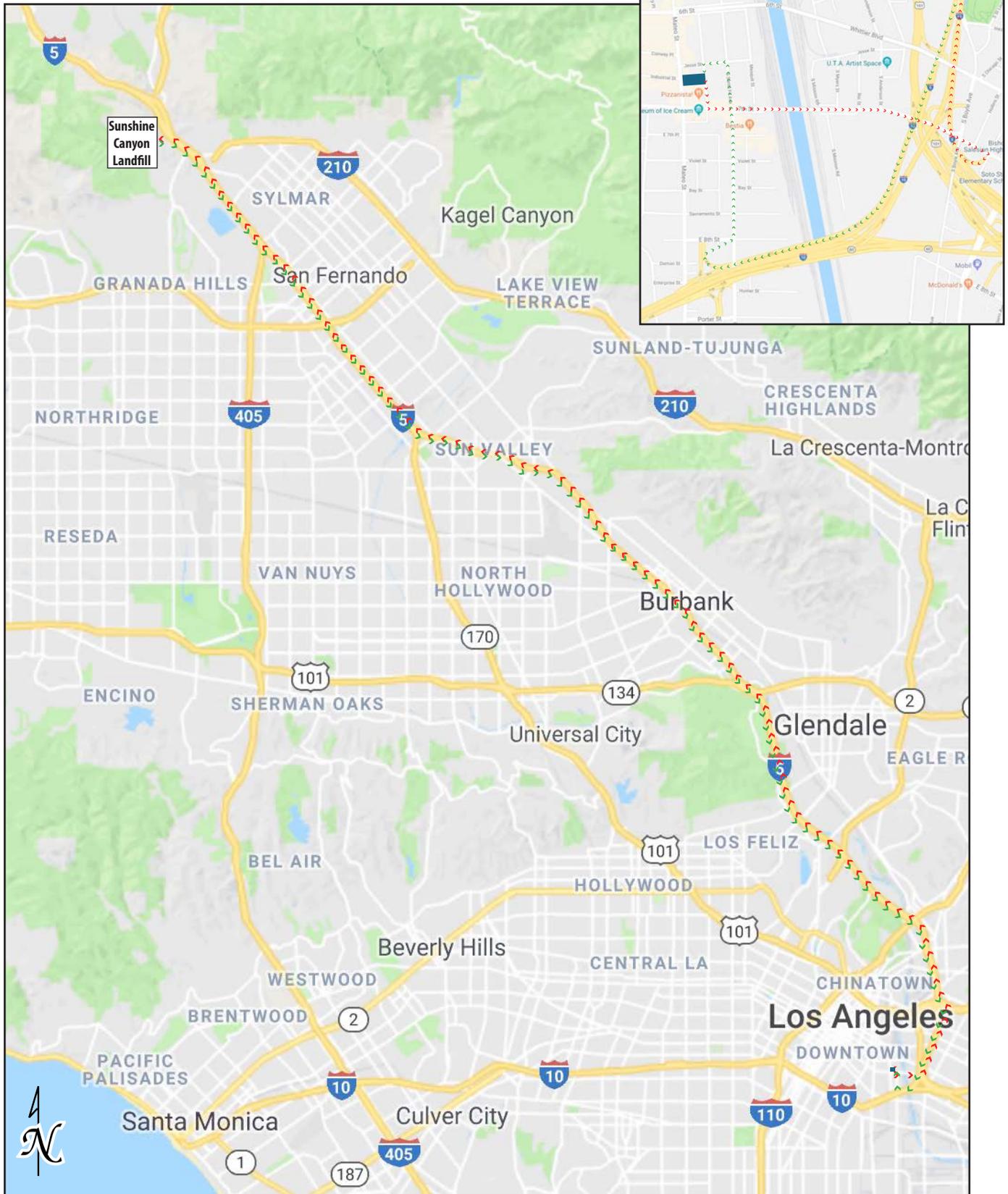
Section II, Project Description, page II-37, under 4. Construction, revise the paragraphs as follows:

“The Project would be constructed over approximately 24 months. Construction activities would include the demolition of the existing warehouse and surface parking lot and grading, excavation, and building construction. Demolition activities are anticipated to start in 2021, and construction completion and occupancy is anticipated in 2023. The construction of the Project would not begin prior to the 4th quarter of 2021 (October 2021).

The Project is estimated to require a net export of approximately 74,500 cubic yards of soil, and thus, would require a haul route permit. The anticipated outbound haul route from the Project Site would be south on ~~Mateo~~ Imperial Street and east on E. 7th Street to the Golden State Freeway (I-5), and the anticipated inbound haul route to the Project Site would be exiting the I-10 from Exit 16A (Santa Fe Avenue) ~~toward Santa Fe Avenue and Mateo Street, east west~~ onto E. 8th Street, ~~and north onto Mateo Street~~ north on Santa Fe Avenue to Jesse Street, west on Jesse Street, and south onto Imperial Street. The locations of the off-site truck staging during hauling activities would be Imperial Street and Jesse Street. Exported materials would likely be disposed at Sunshine Canyon Landfill in Sylmar. The anticipated inbound and outbound haul route for the Project is shown on **Figure II-24, Anticipated Haul Route**. The Project’s haul route would be reviewed by the City as part of its consideration of the Project Applicant’s entitlement requests.

The Project would export the total of 74,500 cubic yards of material over the grading duration of 66 days, which would generate approximately 142 haul truck trips per day (71 inbound, 71 outbound) travelling to and from the Project Site, which represents an average load of 16 cubic yards for each double-bottom dirt haul truck (capacity 20 cubic yards). Construction hours in the City of Los Angeles are 7:00 a.m. to 9:00 p.m. weekdays, 8:00 a.m. to 6:00 p.m. Saturdays and national holidays, and prohibited on Sunday, although construction activity is expected to be completed no later than 5:00 p.m. on construction days. Haul truck activity would be limited to these hours as well.”

Section II, Project Description, page II-38, replace Figure II-24 with the following, which reflects the modifications to the haul route included above:



■ = PROJECT SITE

Source: GoogleEarth, April 2018.

◀ ◀ ◀ ◀ ◀ Haul Route to Sunshine Canyon Landfill

▶ ▶ ▶ ▶ ▶ Haul Route from Sunshine Canyon Landfill

Figure II-24
Anticipated Haul Route

III. Environmental Setting

Section III, Environmental Setting, page III-5, under d) Land Use Plans, revise the first paragraph as follows:

“Regional plans that are applicable to the Project Site include: California Green Building Standards Code, Southern California Association of Governments’ (SCAG) 2008 Regional Comprehensive Plan, SCAG’s 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and 2020-2045 (RTP/SCS), and the South Coast Air Quality Management District’s 2016 Air Quality Management Plan, and Los Angeles County Metropolitan Transportation Authority’s 2010 Congestion Management Plan for Los Angeles County. The City has opted out of the Los Angeles County Congestion Management Program. Therefore, the 2010 Congestion Management Plan is no longer applicable to the Project.”

IV.A. Air Quality

Section IV.A, Air Quality, page IV.A-10, revise the second full paragraph as follows:

“On September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. ~~The RTP/SCS is currently pending certification by the California Air Resources Board (CARB). Similar to the 2016-2040 RTP/SCS, the~~ newly adopted 2020-2045 RTP/SCS encompasses and 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 plan lays out a strategy for the region to meet CARB greenhouse gas reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. In addition, the plan anticipates a 25.7 percent decrease in time spent in traffic delay per capita and a five percent decrease in daily miles driven per capita from 2016 to 2045. It is expected that the growth forecasts in the 2020-2045 RTP/SCS will be incorporated into the next update of the regional Air Quality Management Plan.”

Section IV.A. Air Quality, page IV.A-30, revise footnote 13 as follows:

¹³ *It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project’s consistency with the 2016-2040 RTP/SCS. In addition, the 2016 AQMP is based on 2016-2040 RTP/SCS.*”

Section IV.A. Air Quality, page IV.A-31, revise footnote 14 as follows:

¹⁴ *It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project’s consistency with the 2016-2040 RTP/SCS. In addition, the 2016 AQMP is based on the 2016-2040 RTP/SCS.*”

IV.B. Cultural Resources

No corrections or additions have been made to this section of the Draft EIR.

IV.C. Geology and Soils

No corrections or additions have been made to this section of the Draft EIR.

IV.D. Greenhouse Gas Emissions

Section IV.D, Greenhouse Gas Emissions, page IV.D-18 through and IV.D-20, revise the four paragraphs under (b) Southern California Association of Governments, as follows:

“On ~~April 7, 2016~~ September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the ~~2016-2040~~ 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (~~2016-2040~~ 2020-2045 RTP/SCS). The ~~2016-2040~~ 2020-2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The ~~2016-2040~~ 2020-2045 RTP/SCS provides specific strategies for implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a “Complete Streets” policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.³³

The ~~2016-2040~~ 2020-2045 RTP/SCS states that the SCAG region is home to approximately ~~18.3~~ 19 million people in ~~2012~~ 2016 and currently includes approximately ~~5.9~~ 6 million homes and ~~7.4~~ 8 million jobs. By ~~2040~~ 2045, the integrated growth forecast projects that these figures will increase by ~~3.8~~ 3.6 million people, with nearly ~~4.5~~ 1.6 million more homes and ~~2.4~~ 1.6 million more jobs. High Quality Transit Areas (HQTAs), which are defined by the ~~2016-2040~~ 2020-2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours, will account for 3 percent of regional total land, but are projected to accommodate ~~46~~ 51 percent and ~~55~~ 60 percent of future household and employment growth respectively between ~~2012~~ 2016 and ~~2040~~ 2045.³⁴ The ~~2016-2040~~ 2020-2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region’s HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The SCAG region strives toward sustainability through integrated land use and transportation planning. The SCAG region must achieve specific federal air quality standards and is required by State law to lower regional GHG emissions. California law at

the time required the region to reduce per capita GHG emissions in the SCAG region by eight percent by 2020—compared with 2005 levels—and by 13 percent by 2035. The strategies, programs, and projects outlined in the ~~2016-2040~~ 2020-2045 RTP/SCS are projected to result in GHG emissions reductions in the SCAG region that meet or exceed these targets (i.e., the plan would reduce per capita transportation emissions by ~~8 percent by 2020, 18 percent by 2035, and 21 percent by 2040~~ 19 percent by 2045).³⁵ Accordingly, CARB has accepted that the ~~2016-2040~~ 2020-2045 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the State’s GHG emission reduction goals.

~~On September 3, 2020, SCAG approved and adopted the Connect SoCal 2020-2045 RTP/SCS. The RTP/SCS is currently pending certification by CARB that the RTP/SCS would meet statewide GHG reduction targets. Similar to the 2016-2040 RTP/SCS, the newly adopted 2020-2045 RTP/SCS encompasses and 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 plan lays out a strategy for the region to meet CARB greenhouse gas reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. In addition, the plan anticipates a 25.7 percent decrease in time spent in traffic delay per capita and a five percent decrease in daily miles driven per capita from 2016 to 2045.”~~

Section IV.D, Greenhouse Gas Emissions, page IV.D-19, revise footnote 33 as follows:

³³ *Southern California Association of Governments, ~~2016-2040~~ 2020-2045 RTP/SCS, pages ~~170-181~~ 49-50.”*

Section IV.D, Greenhouse Gas Emissions, page IV.D-19, revise footnote 34 as follows:

³⁴ *Southern California Association of Governments, ~~2016-2040~~ 2020-2045 RTP/SCS, ~~pages 20, 75-77~~ page 128.”*

Section IV.D, Greenhouse Gas Emissions, page IV.D-19, revise footnote 35 as follows:

³⁵ *SCAG, ~~The 2016-2040~~ 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Executive Summary, Adopted ~~April 2016~~ September 2020.”*

Section IV.D, Greenhouse Gas Emissions, page IV.D-25, revise the third paragraph as follows:

“State CEQA Guidelines Appendix G and Section 15064.4, as well as Executive Orders S-3-05 and B-30-15, SB 375, SCAG’s ~~2016-2040~~ 2020-2045 RTP/SCS,⁴⁰ the LA Green Plan, Green New Deal, and the LA Green Building Code all apply to the Project and are all intended to reduce GHG emissions to meet the statewide targets set forth in AB 32 and SB 32. With respect to *State CEQA Guidelines* Appendix G Threshold (a) for greenhouse gas emissions, a quantitative threshold has not been adopted which may determine if a project’s greenhouse gas emissions may have a significant impact on the environment.

Thus, in the absence of any adopted, quantitative threshold, the following threshold of significance has been developed for purposes of this analysis.”

Section IV.D, Greenhouse Gas Emissions, page IV.D-25, revise footnote 40 as follows:

~~“⁴⁰ As discussed in the regulatory setting above, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020–2045 RTP/SCS. In addition, the GHG reduction targets in the 2020–2045 RTP/SCS have not been certified by CARB. Therefore the analysis focuses on the Project’s consistency with the 2016–2040 RTP/SCS. [deleted].”~~

Section IV.D, Greenhouse Gas Emissions, page IV.D-27, under (1) Consistency with Plans, revise the third paragraph as follows:

“A consistency analysis is provided below and describes the Project’s compliance with or exceedance of performance-based standards included in the regulations outlined in the applicable portions of the 2008 Climate Change Scoping Plan and subsequent updates, ~~2016–2040–2020–2045~~ RTP/SCS, and the Green New Deal.”

Section IV.D, Greenhouse Gas Emissions, IV.D-34, under c) Project Design Features, revise the paragraph as follows:

“See Project Design Feature (PDF) TR-1 outlined in **Section IV.K., Transportation**, of this Draft EIR which would reduce ~~air quality~~ GHG emissions impacts by developing a Construction Staging and Traffic Management Plan. The Construction Staging and Traffic Management Plan would reduce impacts to sensitive receptors by ensuring haul trucks follow a specified haul route, and do not travel through residential neighborhoods. The Construction Staging and Traffic Management Plan would also include coordination with nearby projects that have potential overlapping construction timeframes. While this PDF would be beneficial, this ~~air quality~~ GHG analysis does not account for quantitative reductions of ~~air quality~~ GHG emissions which discloses a worst-case scenario.”

Section IV.D, Greenhouse Gas Emissions, IV.D-36, revise the first full paragraph as follows:

“**Table IV.D-4, Project-Related GHG Emissions** shows that the subtotal for the Project’s emissions (~~without accounting for project characteristics or compliance with incorporation of design features/regulations~~) would be 4,444.80 MTCO₂e per year. With the removal of the existing uses, the emissions are reduced to 3,898.59 MTCO₂e per year. The data provided in **Table IV.D-5, Project-Related GHG Emissions With Incorporation of Project Characteristics Design Features and Regulations** shows that the Project’s total “mitigated” emissions (incorporation of ~~design features–project characteristics~~ and compliance with regulation, shown as “mitigation” in the CalEEMod output) would be reduced to 2,848.13 MTCO₂e per year resulting in a reduction of 26.9 percent. The 26.9 percent reduction comes from incorporation of the following project ~~design features characteristics~~ and regulatory compliance: utilizing low-flow fixtures that would reduce

indoor water demand by 20 percent per CALGreen Standards, using water-efficient irrigation systems on-site per City requirements, recycling programs that reduces waste to landfills by a minimum of 75 percent (per AB 341); use of Energy Star® appliances on-site, installation of energy efficient LED lighting, energy efficient glazing and energy efficient window frames; incorporation of the CAPCOA-based land use and site enhancement reduction measures: LUT-1 Increased Density⁵², LUT-3 Increased Diversity⁵³, LUT-6 Integrate Below Market Housing Rate⁵⁴, PDT-1 Limit Parking Supply⁵⁵, and PDT-2 Unbundle Parking Costs⁵⁶. The Project would be required by LAMC to provide approximately 46 new trees. The reduction demonstrates that material reductions in Project GHG emissions would be achieved through conformance with regulations designed to reduce GHG emissions.”

Section IV.D, Greenhouse Gas Emissions, IV.D-37, revise title of Table IV.D-5 as follows:

Table IV.D-5
Project-Related GHG Emissions With Incorporation of Project Characteristics Design Features and Regulations

Section IV.D, Greenhouse Gas Emissions, IV.D-38, under (2) Flexibility Option, revise the second paragraph as follows:

“The GHG emissions have been calculated based on the parameters described above. A summary of the results (using the trip generation rates-based mobile source analysis) are shown below in **Table IV.D-6, Project-Related GHG Emissions Flexibility Option** and the CalEEMod Model runs for the Flexibility Option are provided in **Appendix E** of this Draft EIR. **Table IV.D-6** shows that the subtotal for the Flexibility Option’s emissions (without accounting for project characteristics or compliance with incorporation of design features/regulation) would be 4,572.37 MTCO_{2e} per year. With the removal of the existing uses, the emissions are reduced to 4,026.16 MTCO_{2e} per year. The data provided in **Table IV.D-7, Project-Related GHG Emissions Flexibility Option With Incorporation of Project Characteristics Design Features and Regulations** shows that the Increased Commercial Flexibility Option’s total “mitigated” emissions (incorporation of project characteristics design features and compliance with regulation is shown as “mitigation” in the CalEEMod output) would be reduced to 2,956.01 MTCO_{2e} per year resulting in a reduction of 26.9 percent. The 26.9 percent reduction comes from incorporation of the following project characteristics design features and regulatory compliance: utilizing low-flow fixtures that would reduce indoor water demand by 20 percent per CALGreen Standards, using water-efficient irrigation systems on-site per City requirements, recycling programs that reduces waste to landfills by a minimum of 75 percent (per AB 341); use of Energy Star® appliances on-site, installation of energy efficient LED lighting, energy efficient glazing and energy efficient window frames; incorporation of the CAPCOA-based land use and site enhancement reduction measures: LUT-1 Increased Density⁵⁷, LUT-3 Increased Diversity⁵⁸, LUT-6 Integrate Below Market Housing Rate⁵⁹, PDT-1 Limit Parking Supply⁶⁰, and PDT-2 Unbundle Parking Costs⁶¹. The Flexibility Option would also be

required by LAMC to provide approximately 46 new trees. The reduction demonstrates that material reductions in Project GHG emissions would be achieved through conformance with regulations designed to reduce GHG emissions.”

Section IV.D, Greenhouse Gas Emissions, IV.D-40, revise title of Table IV.D-7 as follows:

Table IV.D-7
Project-Related GHG Emissions Flexibility Option With Incorporation of Project Characteristics Design Features and Regulations

Section IV.D, Greenhouse Gas Emissions, page IV.D-41, under (1) Impact Analysis, revise the first paragraph as follows:

“The following describes the Project’s consistency with applicable regulatory plans and policies intended to reduce GHG emissions, including Executive Orders S-3-05 and B-30-15, AB 32 Scoping Plan, SCAG’s ~~2016-2040~~ 2020-2045 RTP/SCS, the LA Sustainable City pLAn, and the LA Green Building Code. As shown below, the Project would be consistent with the applicable GHG reduction plans, policies, and regulations.”

Section IV.D, Greenhouse Gas Emissions, page IV.D-48, revise heading (c) 2016-2040 RTP/SCS, as follows:

“(c) ~~2016-2040~~ 2020-2045 RTP/SCS”

Section IV.D, Greenhouse Gas Emissions, pages IV.D-48 through IV.D-50, under (c) ~~2016-2040~~ 2020-2045 RTP/SCS, revise as follows:

“The purpose of the ~~2016-2040~~ 2020-2045 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG’s Program EIR for the ~~2016-2040~~ 2020-2045 RTP/SCS, released in ~~December 2015~~ May 2020, states that SB 375 requires “[e]ach [Metropolitan Planning Organization] is required to prepare an SCS in conjunction to [sic] with the RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375.”⁷⁶ As part of the ~~2016-2040~~ RTP/SCS, “~~transportation network improvements would be included, and more compact, infill, walkable and mixed use development strategies to accommodate new region’s growth would be encouraged to accommodate increases in population, households, employment, and travel demand.”⁷⁷~~ Moreover, the ~~2016-2040~~ RTP/SCS states that while “[p]opulation and job growth would induce land use change (development projects) and increase VMT, and would result in direct and indirect GHG emissions,” the ~~2016-2040~~ RTP/SCS would “supports sustainable growth through a more compact, infill, and walkable development pattern.”⁷⁸ “Metropolitan Planning Organizations to include a SCS element as part of their RTP updates, with the purpose of identifying policies and strategies to reduce per capita passenger vehicle-generated GHG emissions. The SCS is required to identify the general location of land uses, residential densities, and building intensities within the region; identify areas within the region

sufficient to house all the population of the region; identify areas within the region sufficient to house an eight-year projection of the regional housing need; identify a transportation network to service the regional transportation needs; gather and consider the best practically available scientific information regarding resources areas and farmland in the region; consider the state housing goals; set forth a forecasted development pattern for the region; and allow the regional transportation plan to comply with the CAA, of which, when integrated with the transportation network, and other transportation measures and policies will reduce the GHG from automobiles and light duty trucks to achieve, if there is a reasonable way to do so, the GHG emission reduction targets approved by CARB.”⁷⁶ The 2020-2045 RTP/SCS seeks “improved mobility, accessibility, reliability and safety that improve the existing transportation system.”⁷⁷ The 2020-2045 RTP/SCS seeks to implement “infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.”⁷⁸ As part of the 2020-2045 RTP/SCS, “transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region’s growth would be encouraged to accommodate increases in population, households, employment, and travel demand.”^{78a}

At the regional level, the ~~2016-2040~~ 2020-2045 RTP/SCS represent the region’s Climate Action Plan that defines strategies for reducing GHGs. In order to assess the Project’s potential to conflict with the ~~2016-2040~~ 2020-2045 RTP/SCS, this section analyzes the Project’s land use profile for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG’s Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

Consistent with SCAG’s ~~2016-2040~~ 2020-2045 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would accommodate increases in population, households, employment, and travel demand. As discussed previously, the Project Site is an urban center location close to jobs, off-site housing, shopping and entertainment uses and in close proximity to public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. The ~~2016-2040~~ 2020-2045 RTP/SCS projects that these urban center/infill areas, while comprising only three percent of land area in the region make up ~~46~~ 51 percent of future household growth and ~~54~~ 60 percent of future job growth.

The Project and Flexibility Option would also be consistent with the ~~following~~ key GHG reduction strategies in the ~~2016-2040~~ 2020-2045 RTP/SCS, which ~~promote~~ are based on changing changes in the region’s land use and travel patterns. Project characteristics that support these strategies include:

- Providing Ccompact growth in an areas accessible to transit;

- Construction of an up to 197,355-square-foot mixed-use building including up to 185 live/work units in an urban center/infill location, with up to 23,380 square feet of art-production and neighborhood-serving retail/commercial space.
- Providing ~~J~~jobs and housing closer to transit;
- Providing ~~N~~new housing and job growth focused in HQTAs (defined by the 2016 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours); and
- Providing ~~B~~biking and walking infrastructure to improve active transportation options and transit access.

Further, the vertical integration of land uses on the Project Site will produce substantial reductions in auto mode share to and from the Project Site that will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the ~~2016-2040~~ 2020-2045 RTP/SCS. Additionally, the inclusion of electric vehicle charging infrastructure (per LA Green Building Code) will support the penetration of electric zero-emission vehicles into the vehicle fleet.

For a discussion of the Project's consistency with the ~~2016-2040~~ 2020-2045 RTP/SCS, please refer to **Section IV.G., Land Use and Planning**, of this Draft EIR. As demonstrated therein, the Project would be consistent with the applicable goals, including those pertaining to reductions in GHG emissions, in the ~~2016-2040~~ 2020-2045 RTP/SCS.

~~It should be noted that the circulation of the Notice of Preparation (NOP) for the Project was on February 23, 2018 which was prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project's consistency with the 2016-2040 RTP/SCS. However, as the 2020-2045 RTP/SCS encompasses and builds upon the previous RTP/SCS, many of the same goals and strategies are similar between the two plans. As demonstrated above, the Project would be located in an area well served by public transit provided by Metro, as well as is in proximity to several transit investment projects in planning and construction phases, including the Regional Connector and Gold Line Arts District station relocation, expansion of the West Santa Ana line into the Arts District, and recently added DASH stops by LADOT to improve service in the Arts District; the Project is comprised of a mix of uses, including commercial uses and 185 live/work units, including eleven percent set aside for (approximately 20 live/work units) deed restricted Very Low Income households; and would create a pedestrian friendly environment through an active and transparent ground floor design and by providing a landscaped paseo connecting Mateo Street and Imperial Street. Furthermore, the integration of land uses on the Project Site would produce substantial reductions in auto mode share to and from the Project Site that would help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces~~

per capita emissions, and would therefore not conflict with the goals of the 2020-2045 RTP/SCS.”

Section IV.D, Greenhouse Gas Emissions, page IV.D-48, revise footnote 76 as follows:

^{“76} *Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2015 Environmental Impact Report – 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, May 2020, Executive Summary, page 3.8-37ES-1.*”

Section IV.D, Greenhouse Gas Emissions, page IV.D-48, revise footnote 77 as follows:

^{“77} *Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2015 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, page 3.8-3510.*”

Section IV.D, Greenhouse Gas Emissions, page IV.D-48, revise footnote 78 as follows:

^{“78} *Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, page 3.8-3649.*”

Section IV.D, Greenhouse Gas Emissions, page IV.D-48, add new footnote 78a:

^{“78a} *Southern California Association of Governments, Environmental Impact Report – Regional Transportation Plan/Sustainable Communities Strategy, May 2020, page 3.8-62.*”

Section IV.D, Greenhouse Gas Emissions, page IV.D-54, under (f) Conclusion, revise the first paragraph as follows:

“Although the Project and Flexibility Plan would generate GHG emissions, GHGs would be reduced in a manner consistent with applicable regulatory plans and policies to reduce GHG emissions, including: Executive Orders S-3-05 and B-30-15; AB 32 Scoping Plan; SCAG’s 2016-2040-2020-2045 RTP/SCS; the LA Sustainable City pLAN; and the LA Green Building Code.”

IV.E. Hazards and Hazardous Materials

No corrections or additions have been made to this section of the Draft EIR.

IV.F. Hydrology and Water Quality

No corrections or additions have been made to this section of the Draft EIR.

IV.G. Land Use and Planning

Section IV.G, Land Use and Planning, page IV.G-1, under (1) Introduction, revise the bullet points as follows:

- “The Project’s consistency with the Southern California Association of Government’s (SCAG’s) *2016-2040 –Regional Transportation Plan/Sustainable Communities Strategy (2016-2040-RTP/SCS)* and smart growth principles that are embodied in SB 375, the *2016 Air Quality Management Plan*, and the *Air Quality Element of the General Plan* are analyzed in **Section IV.A, Air Quality**, of this Draft EIR;
- The Project’s consistency with SCAG’s *2016-2040–2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040–2020-2045 RTP/SCS)*, and the *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan) are analyzed in **Section IV.D, Greenhouse Gas Emissions**, of this Draft EIR;
- The Project’s consistency with the *City of Los Angeles General Plan Safety Element* and the *Los Angeles Municipal Code* (LAMC) are analyzed in **Section IV.E, Hazards and Hazardous Materials**, of this Draft EIR;
- The Project’s consistency with the *City of Los Angeles General Plan Noise Element* and Chapter XI of the LAMC, which includes the City’s comprehensive noise ordinance, are analyzed in **Section IV.N, Noise**, of this Draft EIR;
- The Project’s consistency with the *2016-2040–2020-2045 RTP/SCS*, SCAG’s *Regional Housing Needs Assessment*, the *City of Angeles General Plan Framework Land Use, Housing and Economic Chapters*, the *City of Los Angeles General Plan Housing Element*, and the *Sustainable City pLAN* are analyzed in **Section IV.I, Population and Housing**, of this Draft EIR;
- The Project’s consistency with the *City of Los Angele Charter*, the *City of Angeles General Plan Framework Infrastructure and Public Services Chapter*, the *City of Los Angeles General Plan Safety Element and Open Space Element*, the LAMC, the *2018-2020 Strategic Plan*, the *Mutual Aid Operations Plan*, *Public Recreation Plan*, the *Los Angeles Public Library (LAPL) Branch Facilities Plan*, and the *LAPL Strategic Plan 2015-2020* are analyzed in **Section IV.J, Public Services**, of this Draft EIR; and

The Project’s consistency with the *2016-2040–2020-2045 RTP/SCS*, *Congestion Management Plan*, *City of Los Angeles Mobility Plan 2035*, and the LAMC are analyzed in **Section IV.K, Transportation**, of this Draft EIR.”

Section IV.G, Land Use and Planning, page IV.G-3, the second paragraph as follows:

“On September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. ~~The 2020-2045 RTP/SCS is currently pending certification by the California Air Resources Board (CARB). Similar to the 2016-2040 RTP/SCS, t~~The newly adopted 2020-2045 RTP/SCS encompasses, builds upon and expands previous SCAG RTP/SCS plans’ land use and transportation strategies to improve mobility options and achieve a more sustainable growth pattern. The 2020-2045 RTP/SCS lays out a strategy for the region to meet CARB greenhouse gas reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. In addition, the plan anticipates a five percent decrease in daily miles driven per capita from 2016 to 2045. On October 30, 2020, CARB certified that the greenhouse gas reduction strategies included in the 2020-2045 RTP would achieve Statewide GHG emissions targets.”

Section IV.G, Land Use and Planning, page IV.G-4, under (a) Regional Transportation Plan/Sustainable Communities Strategy, revise as follows:

“As previously discussed, SCAG adopted the ~~2016-2040-2020-2045~~ RTP/SCS on ~~April 7, 2016-September 3, 2020~~. The ~~2016-2040-2020-2045~~ RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region’s residents. For the first time, SCAG has integrated land use, housing and environmental strategies with transportation planning to help meet emissions reduction targets set by the CARB, as required by SB 375. The ~~2016-2040-2020-2045~~ RTP/SCS provides an alternative to “business as usual” development. It encourages community revitalization and neighborhoods that are bike and pedestrian friendly, with convenient access to transit. Approved by state and federal agencies in ~~April 2016-September 2020~~, the ~~2016-2040-2020-2045~~ RTP/SCS includes approximately ~~\$556.5~~ \$638.9 billion in projected funding for transportation projects for Los Angeles County.

The ~~2016-2040-2020-2045~~ RTP/SCS contains a plan to provide adequate highway, transit, rail, aviation, and goods movement infrastructure to meet the region’s needs through 2040. The ~~2016-2040-2020-2045~~ RTP/SCS is linked to Los Angeles County transportation plans and models in the form of shared growth and travel projections. As such, the ~~2016-2040-2020-2045~~ RTP/SCS is guided by and incorporates all projects from Metro’s own Long-Range Transportation Plan.

The ~~2016-2040-2020-2045~~ RTP/SCS includes ~~nine-ten~~ goals that pertain to economic development, mobility, accessibility, travel safety, productivity of the transportation system, protection of the environment and health through improved air quality, reduced greenhouse gas emissions, energy efficiency, and land use and growth patterns that complement the state and region’s transportation investments, and security of the regional transportation system, and promotion of conservation of natural and agricultural lands. A consistency analysis of the goals and policies relevant to the Project is provided in **Table IV.G-1, Project Consistency with the Applicable Goals of the ~~2016-2040-2020-2045~~ RTP/SCS**, found in **Appendix H** of this Draft EIR. The regional transportation impacts of the Project are analyzed in greater detail in **Section IV.K, Transportation**, of this Draft EIR.”

Section IV.G, Land Use and Planning, page IV.G-23, change heading (a) as follows

“(a) ~~2016-2040 and 2020-2045~~ Regional Transportation Plan/Sustainable Communities Strategy”

Section IV.G, Land Use and Planning, page IV.G-23, under (a) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, change the discussion to read:

“Conflicts and consistency of the Project with the ~~2016-2040-2020-2045~~ RTP/SCS is addressed in **Table IV.G-1, Consistency with Applicable Goals of ~~2016-2040-2020-2045~~ RTP/SCS**, found in **Appendix H** of this Draft EIR.

Based on the analysis presented in **Table IV.G-1**, found in **Appendix H** of this Draft EIR, the Project would not be in conflict and would be consistent with applicable ~~2016-2040~~ 2020-2045 RTP/SCS goals. The Project would be located in an area well-served by public transit provided by Metro. Metro provides local bus service in the Project area along E. 6th Street, Alameda Street, and Santa Fe Avenue. In anticipation of the region's planned growth, Metro has several transit investment projects in the planning phases, including the expansion of the West Santa Ana line, with a possible stop at 7th Street and Alameda, and recently added DASH stops by LADOT that would improve service in the Arts District.²² The Project would include short-term and long-term bicycle facilities and create a pedestrian-friendly environment by providing a landscaped paseo connecting Mateo Street and Imperial Street along the southern boundary of the Project Site in an east west orientation and perpendicular to its adjacent streets. The paseo would be open to the sky, and would provide access to ground floor terraces, commercial uses, and amenities. In addition to these transit options, the Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. Development of the Project within this established community would promote a variety of travel choices and would create new employment and housing opportunities in the Arts District area.

As shown in **Table IV.G-1**, found in **Appendix H** of this Draft EIR, the Project would not be in conflict and would be consistent with the ~~2016-2040~~ 2020-2045 goals to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency and facilitate the use of alternative modes of transportation.

~~It should be noted that the circulation of the Notice of Preparation (NOP) for the Project was on [February 23, 2018], prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project's consistency with the 2016-2040 RTP/SCS. However, as the 2020-2045 RTP/SCS encompasses and builds upon the previous RTP/SCS, many of the goals and strategies from the previous plan are incorporated and have been updated or expanded upon. As described above, the Project is comprised of 185 live/work units, 20 live/work units deed restricted for Very Low Income households, and commercial uses, and the Project would be located in an urban area well served by public transit provided by Metro, which as previously mentioned has several transit investment projects in planning phases, including bicycle facilities. Furthermore, the integration of land uses on the Project Site would produce reductions in mode share to and from the Project Site that would help the region accommodate growth and meet the goals of the RTP/SCS that minimize per capita GHG emissions, and would therefore similarly not conflict with the goals of the 2020-2045 RTP/SCS.~~

Therefore, the Project or the Flexibility Option would result in a less than significant impact as it would not conflict with the ~~2016-2040 RTP/SCS and 2020-2045 RTP/SCS.~~"

Section IV.G, Land Use and Planning, page IV.G-26, under (c) City of Los Angeles General Plan Housing Element, revise the second paragraph as follows:

“Based on the analysis presented in **Table IV.G-4**, found in **Appendix H** of this Draft EIR, the Project would be consistent with the applicable objectives and policies in the Housing Element. The Project would provide 185 new live/work units that would add to the citywide housing supply. The Project would be a mixed-use development that would include new jobs associated with office, retail, and restaurant uses that is accessible to Metro local and rapid bus lines along E. 6th Street, E. 7th Street, Alameda Street, and Santa Fe Avenue. In addition, The Project would promote and facilitate reduction of water consumption through the use of water-saving and energy-saving devices, such as low-flow toilets and urinals. Finally, the Project would be an infill, urban-scale development that would be ~~reflective of~~ consistent with the expected visual character of the area as it would be developed in accordance with adopted land use plans, including the Central City North Community Plan and the Central Industrial Redevelopment Project. **Therefore, the Project would result in a less-than-significant impact as it would not conflict with the Los Angeles General Plan Housing Element.**”

Section IV.G, Land Use and Planning, page IV.G-29, change the header (g) to read:

“(g) Central Industrial Redevelopment ~~Area~~Plan”

Section IV.G, Land Use and Planning, page IV.G-40, revise the paragraph as follows:

The Project’s consistency with applicable objectives in the Citywide Design Guidelines is presented in **Table IV.G-9, Consistency with Applicable Objectives of the Citywide Design Guidelines**, found in **Appendix H** of this Draft EIR. The Project Site is an underutilized site occupied with an industrial warehouse building and surface parking lot, The new development would be a mixed-use live/work development that provides opportunities for artists to live in close proximity to work and potentially within the same space. The Project’s proposed design is a contemporary architectural style and would feature sculptural elements, including a custom-shaped building that emerges from a single-story base, oriented west toward the Industrial Street/Mateo Street T-intersection, connecting to the rest of the Project from the third floor and above. The corner building would consist of metal and glass. The remainder of the Mateo Street facade above ground level would consist of masonry and a regular grid of large windows. The Imperial Street facade would consist of the same glass, metal, and masonry, as well as channel glass surrounding the ground-floor entrance to the subterranean parking structure. The materials palette is intended to complement the decorative brick of surrounding buildings and the texture of corrugated metal. The Project has been designed to create a pedestrian-oriented streetscape by providing a variety of commercial uses along Mateo Street and Imperial Street. In addition, the publicly accessible pedestrian paseo would provide connectivity between the building’s frontages and the two public streets. The Project would include approximately 15,320 square feet of useable open space (and approximately 14,160 square feet under the Flexibility Option), of which approximately 9,290 square feet would be outdoor common space, including the pedestrian paseo. Soft lighting would wash the interior walls to ~~create the effect~~ provide for security without producing excessive brightness, and all light fixtures would be shielded to avoid light or glare

spillover. New Project signage would be used for building identification, wayfinding, and security. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties. **Therefore, the Project or the Flexibility Option would not conflict with the Citywide Design Guidelines and impacts would be less than significant.**

IV.H. Noise

Section IV.H, Noise, page IV.H-23, under (c) Project Design Features, revise the paragraph as follows:

“No specific Project Design Features related to noise reduction are included in the Project. The Project would implement the following project design feature (PDF) to minimize adverse noise impacts. The PDF would be incorporated into the Project and is considered to be part of the Project for purposes of the impact analysis.

PDF NOI-1 Amplified music and amplified speech will be prohibited between the hours of 9 p.m. and 8 a.m.”

Section IV.H, Noise, page IV.H-27, revise the first paragraph as follows:

“As shown in **Table IV.H-9**, without mitigation, peak construction noise levels at all sensitive receptors would be below the 75 dBA construction noise threshold defined by ~~Section 41.40~~ Section 112.05 of the LAMC.”

Section IV.H, Noise, page IV.H-28, revise the second full paragraph as follows:

“In addition to on-site construction activities, the Project would also generate off-site construction activities and noise during the excavation phase in the form of haul trips. The Project would export a total of 74,500 cubic yards of material over the grading duration of 66 days, which would generate approximately 142 haul truck trips per day (71 inbound, 71 outbound) travelling to and from the Project Site. The anticipated outbound haul route from the Project Site would be south on ~~Mateo~~ Imperial Street and east on E. 7th Street to the Golden State Freeway (I-5), and the anticipated inbound haul route to the Project Site would be exiting the I-10 from Exit 16A (~~Santa Fe Avenue~~) toward Santa Fe Avenue and Mateo Street, west east onto E. 8th Street, ~~and north onto Mateo Street~~ north on Santa Fe Avenue to Jesse Street, west on Jesse Street, and south onto Imperial Street. Exported materials would likely be disposed at Sunshine Canyon Landfill in Sylmar. Building frontages along the haul route are located approximately 30 feet from the roadway center line. Moreover, multi-family and single-family residential receptors are located along the anticipated haul route. As shown in **Table IV.H-8** above, typical noise from haul trucks driving by can reach up to 76 dBA L_{max} at a distance of 50 feet. As shown in **Table IV.H-7**, the existing, daytime maximum noise for Mateo Street is 77.3 dBA; 86.7 dBA L_{max} for Imperial Street. Therefore, the noise level of a Project haul truck passing by would be

lower than the existing, ambient noise levels at receptor locations along haul route roadway segments.”

Section IV.H, Noise, page IV.H-34, revise **MM NOI-1** as follows:

MM NOI-1 “During all Project Site demolition and excavation/grading, construction contractors shall install a temporary, continuous sound barrier along the western (Mateo Street) boundary of the Project Site. The barrier shall be at least 8 feet in height and constructed of materials achieving a Transmission Loss (TL) value of at least 10 dBA, such as ½ inch plywood.²⁶ The supporting structures shall be engineered and erected according to applicable codes. At the time of plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.”

Section IV.H, Noise, page IV.H-34, add **MM NOI-2** as follows:

“MM NOI-2 Prior to any demolition and excavating/grading, to address construction sound levels above the ground floor at receptor 1 (Biscuit Company Lofts and Toy Factory Lofts), the Project Applicant shall submit a noise mitigation analysis prepared by a qualified acoustic specialist for the review and approval of the Department of City Planning and the Department of Building and Safety that defines any additional temporary sound barriers, specific equipment mix, noise mufflers and buffer distances for specific pieces of equipment, and/or other measures that would reduce the effect of construction noise on the above ground-floor units at the Biscuit Company Lofts and Toy Factory Lofts to less than a 5-dBA increase above ambient levels, with calculations showing the actual mix of equipment and demolition techniques to be used, source levels, and utilization rates, and the resulting noise levels at sensitive receptors. Any supporting structures shall be engineered and erected according to applicable codes. At the time of plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.”

Section IV.H, Noise, page IV.H-44, add the following before the last paragraph of Section (4. Cumulative Impacts, a) Construction Noise):

“Construction of the related projects would involve truck traffic for hauling and deliveries, which could potentially overlap with construction truck traffic from the Project. The extent to which truck traffic associated with the Project would overlap with the related projects is speculative as the construction schedules for the related projects cannot be known at present. However, even if construction schedules were to overlap, as with the Project, related projects would be required to prepare Construction Staging and Traffic Management Programs, which would be submitted to LADOT. LADOT would review these plans and ensure that haul routes for the related projects would not use the same roadways at the same time as the Project, in order to avoid traffic conflicts. As such, it is unlikely that, even if construction schedules of the Project and related projects were to

overlap, trucks would not be using the same routes, and the potential for cumulative noise impacts from construction trucks would be minimal.”

Section IV.H, Noise, page IV.H-46, revise the second paragraph as follows:

“Operational noise associated with the ~~Proposed~~ Project would be consistent with the other land uses in the Project area. As is true for the Project, compliance with the LAMC-required provisions that limit stationary source noise from items, such as rooftop mechanical equipment, would ensure that noise levels would be less than significant at the property line for each related project. In addition, onsite noise generated by each related project would be sufficiently low and sufficiently distant from the Project Site that it would not result in an additive increase to Project-related noise levels.”

IV.I. Population and Housing

Section IV.I, Population and Housing, page IV.I-2, under (b) Senate Bill 375, revise the second paragraph as follows:

“SB 375 requires ~~the~~ CARB to develop regional reduction targets for GHG emissions, and calls for the creation of regional plans to reduce those emissions from vehicle use through the development of more compact, complete, and efficient communities. The theory behind SB 375 is that if Californians spend less time and travel fewer miles in their vehicles, those vehicles would emit fewer GHGs. This can be done, in part, by locating growth in areas already devoted to urban uses that are readily accessible to transit. In accordance with SB 375, each of California’s 18 Metropolitan Planning Organizations, including SCAG, were required to develop a “Sustainable Community Strategy” (SCS) through integrated land use and transportation planning. ~~Subsequently, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS),⁴ updated in September 2020 with the 2020-2045 RTP/SCS.² The SCS goals and policies that reduce VMT (and result in corresponding decreases in transportation-related fuel consumption) focus on transportation and land use planning and include building infill projects, locating residents closer to where they work and play, and designing communities with access to high quality transit service. Finally, SB 375 requires SCAG to “develop overall guidelines, create public participation plans, ensure coordination, resolve conflicts, make sure that the overall plan complies with applicable legal requirements, and adopt the plan for the region.” Accordingly, consistency with SB 375 is demonstrated through consistency with the goals and policies of SCAG’s 2016-2040 RTP/SCS and 2020-2045 RTP/SCS. The Project’s consistency with the relevant goals and policies of the RTP/SCS is provided in **Table IV.G-1, Project Consistency with the Applicable Goals of the 2016-2040 RTP/SCS**, found in **Appendix H** of this Draft EIR and discussion of the 2020-2045 RTP/SCS is included below. As discussed further below, on September 3, 2020, SCAG adopted its Connect SoCal: The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), which is an update to the previous 2016-2040 RTP/SCS.¹ Using growth forecasts and economic~~

trends, the RTP/SCS provides a vision for transportation throughout the region for the next 25 years that achieves the statewide reduction targets; and in so doing identifies the amount and location of growth expected to occur within the region. Accordingly, consistency with SB 375 is demonstrated through consistency with the goals and policies of SCAG's 2016-2040 RTP/SCS and 2020-2045 RTP/SCS. The Project's consistency with the relevant goals and policies of the RTP/SCS is provided in **Table IV.G-1, Project Consistency with the Applicable Goals of the 2016-2040 2020-2045 RTP/SCS**, found in **Appendix H** of this Draft EIR and discussion of the 2020-2045 RTP/SCS is included below."

Section IV.I, Population and Housing, page IV.I-2, revise footnote 1 as follows:

¹ *Southern California Association of Governments, 2016-2040-2020-2045 RTP/SCS, April 2016, available at: <https://scag.ca.gov/connect-socal>. Accessed January 2021.*

Section IV.I, Population and Housing, page IV.I-2, revise footnote 2 as follows.

² *Southern California Association of Governments, 2020-2045 RTP/SCS, September 2020. [deleted]*

Section IV.I, Population and Housing, page IV.I-3, under (b) Regional Transportation Plan/Sustainable Communities Strategy, replace the entire discussion with:

"Pursuant to Government Code Section 65080(b)(2)(B), SCAG must prepare a RTP/SCS, which (1) identifies the general location of uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Government Code Section 65584; (4) identify a transportation network to service the transportation needs of the region; (5) gather and consider the best practically available scientific information regarding resource areas and farmland in the region; and (6) consider the State housing goals specified in Sections 65580 and 65581, (7) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the GHG emissions from automobiles and light trucks to achieve the GHG reduction targets approved by the state board, and (8) allow the RTP to comply with air quality conformity requirements under the federal Clean Air Act.

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS. On October 30, 2020, CARB accepted SCAG's determination that the SCS would achieve GHG emission reduction targets. The 2020-2045 RTP/SCS meets federal and State requirements and is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS contains

baseline socioeconomic projections that serve as the basis for SCAG's transportation planning. It includes projections of population, households, and employment forecasted for the years 2020, 2030, 2035, and 2045 at the regional, county, and local jurisdictional levels, and Traffic Analysis Zones (TAZ) that provide small area data for transportation modeling.³ However, TAZ-level projections are utilized by SCAG for regional modeling purposes and are not adopted as part of the 2020-2045 RTP/SCS or included as part of the Forecasted Regional Development Pattern.⁴

Section IV.I, Population and Housing, page IV.I-4, revise footnote 3 as follows:

~~³ *The Southern California Association of Governments provides population, housing, and employment estimates forecasted for 2020, 2035, and 2040 for regional, county, and city/jurisdictional geographies. Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics & Growth Forecast Appendix, available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf. Accessed January 2021.*~~

Section IV.I, Population and Housing, page IV.I-4, revise footnote 4 as follows:

~~⁴ *Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Adopted April 2016, Figure 5.1, System Management Pyramid, p. 85. Southern California Association of Governments, 2020-2045 RTP/SCS, Demographics & Growth Forecast Appendix, page 27, available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf. Accessed January 2021.*~~

Section IV.I, Population and Housing, page IV.I-4, revise footnote 5 as follows:

~~⁵ *Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Adopted April 2016, Figure 5.1, System Management Pyramid, p. 16. [deleted].*~~

Section IV.I, Population and Housing, page IV.I-4, revise footnote 6 as follows:

~~⁶ *Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Adopted April 2016, Figure 5.1, System Management Pyramid, p. 20. [deleted].*~~

Section IV.I, Population and Housing, page IV.I-4, revise footnote 7 as follows:

~~⁷ *Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Adopted April 2016, Figure 5.1, System Management Pyramid, p. 75. [deleted].*~~

Section IV.I, Population and Housing, page IV-5, revise footnote 8 as follows:

~~⁸ *Southern California Association of Governments, The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Adopted April 2016, Figure 5.1, System Management Pyramid, ps. 25 and 27. [deleted].*~~

Section IV.I, Population and Housing, pages IV.I-10 and IV.I-11, under (1) Existing and Forecasted Population, Housing, and Employment Estimates for the City of Los Angeles, revise the first paragraph as follows:

“The Project Site is located within the Central City Community Plan Area of the City. Project impacts at the citywide level are analyzed in this section with current and future projected population, housing and employment estimates based on data included in the ~~2016-2040-2020-2045~~ RTP/SCS²⁴The ~~2016-2040-2020-2045~~ RTP/SCS prepares growth projections for populations, households, and employment for regional, county, local jurisdictional areas and transportation analysis zones (TAZs), which is a geographic unit for inventorying demographic data. The ~~2016-2040-2020-2045~~ RTP/SCS reports the demographic data for years ~~2012-2016~~ and ~~2040-2045~~. The ~~2016-2040-2020-2045~~ RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, accounting for recent and past trends, reasonable key technical assumptions, and local or regional growth policies. The 2018 baseline population and the growth projections for 2023 (Project buildout year) and ~~2040-2045~~ (SCAG projection horizon year) are shown in **Table IV.I-1, Population, Housing, and Employment Forecasts for the City of Los Angeles Subregion**, and discussed below.”

**Table IV.I-1
Population, Housing and Employment Forecasts
for the City of Los Angeles Subregion**

Area	Population	Housing Units	Employment
City of Los Angeles			
SCAG Forecasts			
2018 ^a	4,059,665	1,480,426	1,871,484 <u>1,868,214</u>
2023 ^b	4,178,547 <u>4,182,927</u>	1,525,712 <u>1,544,807</u>	1,935,320 <u>1,915,120</u>
2040-2045 ^c	4,609,400 <u>4,771,300</u>	1,690,300 <u>1,793,000</u>	2,169,100 <u>2,135,900</u>
Change [Percent Change]			
2018 to 2023	118,882 [+2.9%] <u>123,262 [+3.0%]</u>	45,286 [+3.1%] <u>64,381 [+4.3%]</u>	63,836 [+3.4%] <u>46,906 [+2.5%]</u>
2018 to 2040-2045	549,735 [+13.5%] <u>711,635 [+17.5%]</u>	209,874 [+14.2%] <u>312,574 [+21.1%]</u>	297,616 [+15.9%] <u>267,686 [+14.3%]</u>
^a Project baseline year values source: Southern California Association of Governments, Local Profiles Report 2018, Profile of the City of Los Angeles, May 2019, page 3. Note that the Local Profiles Report value for employment is for 2017. Accordingly, the 2018 value was interpolated according to the compound growth rate described below in footnote b. ^b Project buildout year values were interpolated from the difference between the baseline year values and the SCAG projection horizon year values using a compound growth rate of 0.58 <u>0.60</u> percent for population, 0.60 <u>0.71</u> percent for housing, and 0.67 <u>0.50</u> percent for employment. ²² ^c SCAG projections horizon year values source: Source (table): EcoTierra Consulting, <u>May 2020 January 2021</u> .			

Section IV.I, Population and Housing, page IV.I-11, revise footnote 21 as follows:

²¹ ~~As discussed in the regulatory setting above, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020–2045 RTP/SCS, and therefore the analysis focuses on the Project’s consistency with the 2016–2040 RTP/SCS.~~[deleted].”

Section IV.I, Population and Housing, page IV.I-11, revise footnote 22 as follows:

²² ~~Formula for determining compound annual growth rate is $CAGR = ((V_{final} / V_{begin}) ^ {1/t}) - 1$; where CAGR = compound growth rate, V_{final} = the final value, V_{begin} = the beginning value, and t = the time between the beginning and final values. So, in the 2018–2040 population example above: $((4,609,400 / 4,059,665) ^ {4/22}) - 1 = 0.58$~~ 2018–2045 population example above: $((4,771,300 / 4,059,665) ^ {4/22}) - 1 = 0.60$ percent yearly population growth.”

Section IV.I, Population and Housing, page IV.I-11, under (a) Population, change the discussion to read:

“As indicated in **Table IV.I-1**, the City population is expected to grow beyond its estimated 2018 population of 4,059,665 people by approximately ~~118,882~~ 123,262 people (or ~~2.9~~ 3.0 percent) by Project buildout in 2023. By ~~2040~~ 2045, the horizon year of SCAG projections, the City population is expected to grow by ~~549,735~~ 711,635 people (or ~~13.5~~ 17.5 percent) over 2018 baseline estimates.”

Section IV.I, Population and Housing, page IV.I-12, under (b) Housing, change the discussion to read:

“As indicated in **Table IV.I-1**, the number of housing units in the City is expected to grow beyond its estimated 2018 supply of 1,480,426 housing units by approximately ~~45,286~~ 64,381 housing units (or ~~3.1~~ 4.3 percent) by Project buildout in 2023. By ~~2040~~ 2045, the number of housing units in the City is expected to grow by ~~209,874~~ 312,574 housing units (or ~~14.2~~ 21.1 percent) over 2018 baseline estimates.”

Section IV.I, Population and Housing, page IV.I-12, under (c) Employment, change the discussion to read:

“As indicated in **Table IV.I-1**, the number of jobs in the City is expected to grow beyond its estimated 2018 supply of ~~1,871,484~~ 1,868,214 jobs by approximately ~~63,836~~ 46,906 jobs (or ~~3.4~~ 2.5 percent) by Project buildout in 2023. By ~~2040~~ 2045, the number of jobs in the City is expected to grow by ~~310,128~~ 267,686 (or ~~16.7~~ 14.3 percent) over 2018 baseline estimates.”

Section IV.I, Population and Housing, pages IV.I-14 and IV.I-15, under b) Methodology, revise the third and fourth paragraphs as follows:

~~“The projections of future population, housing, and employment in this section are based on interpolation of data provided in SCAG’s 2016-2040-2020-2045 RTP/SCS.²⁶ As discussed in the regulatory setting above, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020-2045 RTP/SCS. It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project’s consistency with the 2016-2040 RTP/SCS. The 2016-2040-2020-2045 RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, accounting for recent and past trends, key demographic and economic assumptions,²⁷ and local or regional growth policies.~~

The Project’s generation of population, housing, and employment were compared to the growth projections in SCAG’s ~~2016-2040-2020-2045 RTP/SCS~~ for the City that were presented above in **Table IV.I-1, Population, Housing, and Employment Forecasts for the City of Los Angeles Subregion.**”

Section IV.I, Population and Housing, page IV.I-14, revise footnote 26 as follows:

~~“²⁶ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction. *Southern California Association of Governments, 2016-2040 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies, Final Growth Forecast by Jurisdiction.*”~~

Section IV.I, Population and Housing, page IV.I-14, change footnote 27 to read:

~~“²⁷ Detailed technical assumptions can be found in: Southern California Association of Governments, 2016-2040 2020-2045 Regional Transportation Plan/Sustainable Communities Strategies, Demographics and Growth Forecast Appendix, Forecast Methodology and Assumptions, pages 14-20 20-28.”~~

Section IV.I, Population and Housing, pages IV.I-16 and IV.I-17, under (ii) Operation, revise the paragraph as follows:

“The Project would replace the existing warehouse and parking lot with a 197,355-square-foot mixed-use building containing 185 live/work units and 23,380 square feet of art-production and commercial space. In order to provide the most conservative estimate of employment generation for the Project, consistent with the traffic study assumptions, 3,900 square feet of the live/work units ~~was~~ were designated as office space and included in the employment calculations. Development of the Project would create new housing and generate employees and residents in the area. The Project’s estimated contributions to the residential population, housing supply, and employment are summarized below in **Table IV.I-3, Project Generation of Population, Housing, and Employment.** The projected Project-related increases are compared to growth projections in the SCAG

2016-2040-2020-2045 RTP/SCS for the City in Table IV.I-4, Project Population, Housing, and Employment Impacts for the City of Los Angeles.”

Section IV.I, Population and Housing, page IV.I-18, revise Table IV.I-4, Project Population, Housing, and Employment Impacts for the City of Los Angeles, as follows:

**Table IV.I-4
Project Population, Housing, and Employment Impacts
for the City of Los Angeles**

	Project Increase ^a	SCAG Projected Growth ^b	Project Percentage of Growth
Population			
2018 – 2023 Buildout	448	118,882 <u>123,262</u>	0.4
2018 – 2040-2045 Projection Horizon	448	549,735 <u>711,635</u>	0.1
Housing Units			
2018 – 2023 Buildout	185	45,286 <u>64,381</u>	0.4 <u>0.3</u>
2018 – 2040-2045 Projection Horizon	185	209,874 <u>312,574</u>	0.1
Employment			
2018 – 2023 Buildout	(2) / 92 ^c	63,836 <u>46,906</u>	0 / 0.1 <u>0.2</u>
2018 – 2040-2045 Projection Horizon	(2) / 92 ^c	310,128 <u>267,686</u>	0 / <0.1
<p><i>a From Table IV.I-3.</i> <i>b From Table IV.I-1.</i> <i>c Based on the existing employment at the Project Site at the time of the publication of the NOP, the Project would result in a net decrease of 2 jobs at the Site compared to existing conditions; however, because the existing warehouse use has been vacated subsequent to the publication of the Project’s NOP, in order to provide the most conservative estimate of employment impacts, this analysis assumes that there is no existing employment at the Project Site and the Project would result in an increase of 92 jobs.</i> Source (table): EcoTierra Consulting, 2020-January 2021.</p>			

Section IV.I, Population and Housing, page IV.I-18, revise the first paragraph as follows:

“Population growth can be a direct result of the creation of new housing and employment in an area. As shown in **Table IV.I-4**, the Project would create 185 new housing units, which, based on the City’s average household size of 2.42 persons per multi-family household,²⁸ would generate an estimated 448 new residents. Based on SCAG’s projected growth for the City, the Project’s housing growth of 185 housing units would represent approximately 0.4 percent of the short-term housing growth projections and 0.1 percent of the long-term housing growth projections for the City. The Project’s population growth of 448 residents would represent approximately 0.4 percent of the short-term

population growth projections and 0.1 percent of the long-term population growth projections for the City. Because the Project would result in a net decrease of 2 jobs at the Project Site compared to existing conditions, the Project would account for 0 percent of the short-term and long-term employment growth projections for the City. As such, there would be no direct Project-related increase in employment. However, because the existing warehouse use has been vacated subsequent to the publication of the Project's NOP, in order to provide the most conservative estimate of employment impacts, this analysis assumes that there is no existing employment at the Project Site and the Project would result in an increase of 92 jobs (see employment generation in **Table IV.I-3** above). Under these assumptions, the Project's employment growth of 92 jobs would represent approximately ~~0.1~~0.2 percent of the short-term employment growth projections and less than 0.1 percent of the long-term employment growth projections for the City. Accordingly, the Project's direct growth in the City would not be substantial and would be within SCAG's planning projections for the City."

Section IV.I, Population and Housing, page IV.I-20, revise the first full paragraph as follows:

"The jobs/housing ratio for the entire SCAG region is approximately ~~1.35~~1.40.³² That is, there are approximately 1.35 jobs for each household unit. Based on the 2018 employment and household estimates presented in **Table IV.I-1**, above, the 2018 jobs/housing ratio in the City was 1.26. The projected 2023 estimate is ~~1.4~~1.24. The projected ~~2040-2045~~ estimate is ~~1.28~~1.19. As such, the jobs/housing ratio is expected to ~~increase~~ decrease slightly, ~~but remain largely stable~~ meaning housing is expected to increase at a larger rate than jobs. As the Project represents a very small percentage of 2023 and ~~2040-2045~~ employment and housing within both the SCAG region and the City, the growth generated by the Project would have a negligible effect on the regional and Citywide jobs/housing ratios. However, the Project's generation of 92 employees and 185 live/work units at the Project Site would create a jobs/housing ratio of 0.50, which shows that the Project would be more housing-rich. Therefore, the Project would support the anticipated population trends and SCAG efforts to improve the jobs/housing balance of local communities in the region by providing more housing units than employees on the Project Site."

Section IV.I, Population and Housing, page IV.I-20, revise footnote 32 as follows:

³² *Southern California Association of Governments, ~~2016-2040~~ 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographics & Growth Forecast Appendix, Adopted: ~~April 2016~~ September 3, 2020. Based on ~~2015-2016~~ regional employment value of ~~8,006,000~~ 8,389,000 as presented in Table 8, Regional Population and Employment by County, p. 18, and ~~2016~~ regional household unit value of ~~5,947,000~~ 6,012,000 households as presented in Table 4, Characteristics of Regional Households, Table 14: Jurisdictional-Level Growth Forecast, p. 8 pages 33 to 40."*

Section IV.I, Population and Housing, pages IV.I-21 and IV.I-22, under (ii) Operation, revise the paragraph as follows:

“As with the Project, in order to provide the most conservative estimate of employment generation for the Flexibility Option, consistent with the traffic study assumptions, 3,600 square feet of the live/work units was designated as office space and included in the employment calculations. Development of the Flexibility Option would create new housing and generate employees and residents in the area. The Flexibility Option estimated contributions to the residential population, housing supply, and employment are summarized below in **Table IV.I-5, Flexibility Option Generation of Population, Housing, and Employment**. The projected Flexibility Option-related increases are compared to growth projections in the SCAG ~~2016-2040~~ 2020-2045 RTP/SCS for the City in **Table IV.I-4, Project Population, Housing, and Employment Impacts for the City of Los Angeles**.”

Section IV.I, Population and Housing, page IV.I-23, revise Table IV.I-6, Flexibility Option Population, Housing, and Employment Impacts as follows:

**Table IV.I-6
Flexibility Option Population, Housing, and Employment Impacts
for the City of Los Angeles**

	Project Increase ^a	SCAG Projected Growth ^b	Project Percentage of Growth
Population			
2018 – 2023 Buildout	385	118,882 <u>123,262</u>	0.3
2018 – 2040-2045 Projection Horizon	385	549,735 <u>711,635</u>	0.1
Housing Units			
2018 – 2023 Buildout	159	45,286 <u>64,381</u>	0.4 <u>0.2</u>
2018 – 2040-2045 Projection Horizon	159	209,874 <u>312,574</u>	0.1
Employment			
2018 – 2023 Buildout	57 / 151 ^c	63,836 <u>46,906</u>	0.1 / 0.2 <u>0.3</u>
2018 – 2040-2045 Projection Horizon	57 / 151 ^c	310,128 <u>267,686</u>	<0.1 / <0.1 <u>0.1</u>
<p><i>a From Table IV.I-3.</i></p> <p><i>b From Table IV.I-1.</i></p> <p><i>c Based on the existing employment at the Project Site at the time of the publication of the NOP, the Flexibility Option would result in an increase of 57 jobs at the Project Site compared to existing conditions; however, because the existing warehouse use has been vacated subsequent to the publication of the Project’s NOP, in order to provide the most conservative estimate of employment impacts, this analysis assumes that there is no existing employment at the Project Site and the Flexibility Option would result in an increase of 151 jobs.</i></p> <p><i>Source (table): EcoTierra Consulting, <u>2020-January 2021</u>.</i></p>			

Section IV.I, Population and Housing, pages IV.I-23 and IV.I-24, under a. Direct Population Growth, change the last sentence of the paragraph to read:

“Population growth can be a direct result of the creation of new housing and employment in an area. As shown in **Table IV.I-6**, the Flexibility Option would create 159 new housing units, which, based on the City’s average household size of 2.42 persons per multi-family household,³³ would generate an estimated 385 new residents. Based on SCAG’s projected growth for the City, the Flexibility Option’s housing growth of 159 units would represent approximately 0.4 percent of the short-term housing growth and 0.1 percent of the long-term housing growth projections for the City. The Flexibility Option’s population growth of 385 residents would represent approximately 0.3 percent of the short-term population growth projections and 0.1 percent of the long-term population growth projections for the City. The Flexibility Option’s net employment growth of 57 jobs would represent approximately 0.1 percent of the short-term employment growth projections and less than 0.1 percent of the long-term employment growth projections for the City. However, because the existing warehouse use has been vacated subsequent to the publication of the Project’s NOP, in order to provide the most conservative estimate of employment impacts, this analysis assumes that there is no existing employment at the Project Site and the Flexibility Option would result in an increase of 151 jobs (see employment generation in **Table IV.I-5** above). Under these assumptions, the Flexibility Option’s employment growth of 151 jobs would represent approximately ~~0.2~~ 0.3 percent of the short-term employment growth projections and ~~less than~~ 0.1 percent of the long-term employment growth projections for the City. Accordingly, the Project’s direct growth in the City would not be substantial and would be within SCAG’s planning projections for the City.”

Section IV.I, Population and Housing, page IV.I-25, revise the first full paragraph discussion as follows:

“The jobs/housing ratio for the entire SCAG region is approximately ~~1.35~~ 1.40.³⁷ That is, there are approximately 1.35 jobs for each household unit. Based on the 2018 employment and household estimates presented in **Table IV.I-1**, above, the 2018 jobs/housing ratio in the City was 1.26. The projected 2023 estimate is ~~1.4~~ 1.24. The projected ~~2040-2045~~ estimate is ~~1.28~~ 1.19. As such, the jobs/housing ratio is expected to ~~increase~~ decrease slightly, ~~but remain largely stable meaning housing is expected to increase at a larger rate than jobs.~~ As the Flexibility Option represents a very small percentage of ~~2021-2023~~ and ~~2040-2045~~ employment and housing within both the SCAG region and the City, the growth generated by the Flexibility Option would have a negligible effect on the regional and Citywide jobs/housing ratios. However, the Flexibility Option’s generation of 151 employees and 159 live/work units at the Project Site would create a jobs/housing ratio of 0.95, which shows that the Flexibility Option would be balanced, with slightly more housing than jobs. Therefore, the Flexibility Option would support the anticipated population trends and SCAG efforts to improve the jobs/housing balance of

local communities in the region by providing more housing units than employees on the Project Site, although to a lesser extent than the Project.”

Section IV.I, Population and Housing, page IV.I-25, revise footnote 37 as follows:

³⁷ *Southern California Association of Governments, 2016-2040 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographics & Growth Forecast Appendix, Adopted: April 2016 September 3, 2020. Based on 2015-2016 regional employment value of 8,006,000 8,389,000 as presented in Table 8, Regional Population and Employment by County, p. 18, and 2016 regional household unit value of 5,947,000 6,012,000 households as presented in Table 4, Characteristics of Regional Households, Table 14: Jurisdictional-Level Growth Forecast, p. 8 pages 33 to 40.*

Section IV.I, Population and Housing, page IV.I-28, revise the first paragraph as follows:

“**Table IV.I-8, Cumulative Project Population, Housing, and Employment Impacts in the City of Los Angeles (Project)**, compares projected cumulative growth within the City, inclusive of the Project, to 2018 RTP/SCS ~~2040–2045~~ horizon year projections. Projections focus on the ~~2040-2045~~ horizon year as opposed to the Project’s 2023 buildout date because SCAG projections incorporate regional policies and are based on long-term demographic trends that average out short-term variations, which may not be reflected in shorter-term 2023 projections³⁸. In addition, California and the federal government require that SCAG and other regional planning agencies update their respective RTP/SCS every four years. Frequent updates allow SCAG to reflect land use and planning changes that have occurred since previous updates in order to present the most accurate long-term projections. Accordingly, the long-term projections, not the interim projections, are the most accurate reflections of the development changes within the region.”

Section IV.I, Population and Housing, page IV.I-28, revise Table IV.I-8, Cumulative Project Population, Housing, and Employment Impacts in the City of Los Angeles (Project), as follows:

**Table IV.I-8
Cumulative Project Population, Housing, and Employment Impacts
in the City of Los Angeles (Project)**

	Cumulative Increase ^a	SCAG Projected Growth ^b	Cumulative Percentage of Growth
Population	5,491	549,735 <u>711,635</u>	4.0 <u>0.8</u>
Housing Units	13,289	209,874 <u>312,574</u>	6.3 <u>4.3</u>
Employment	15,005	310,128 <u>267,686</u>	4.8 <u>5.6</u>
<i>a From Table IV.I-7. b From Table IV.I-1. Source (table): EcoTierra Consulting, 2020 January 2021.</i>			

Section IV.I, Population and Housing, page IV.I-28, revise the second paragraph (the first paragraph after Table IV.I-8) as follows:

“As indicated in **Table IV.I-8**, the cumulative population growth of 5,491 people would represent ~~4.0~~0.8 percent of SCAG’s population growth estimate for the ~~2040~~2045 horizon year; the cumulative housing growth of 13,289 units would represent ~~6.3~~4.3 percent of SCAG’s housing growth estimate; and the cumulative employment growth of 15,005 jobs would represent ~~4.8~~5.6 percent of SCAG’s employment growth estimate. Accordingly, the cumulative growth would be within SCAG’s long-range projections for the City identified in the ~~2016-2040~~2020-2045 RTP/SCS.”

Section IV.I, Population and Housing, page IV.I-28, revise the third paragraph as follows:

“The smaller increase in population (~~4.0~~0.8 percent) than housing units (~~6.3~~4.3 percent) show that the City is generating more housing than population to help meet the existing housing deficit. Additionally, the increases in the number and variety of housing units and employment opportunities in the Project vicinity would provide housing and jobs in proximity to public transit, which would be consistent with regional and City policies to focus development in areas well served by public transit. The increase in housing stock in the City provides opportunities for residents to locate within an HQTAs and within proximity to transit facilities, thereby reducing the demand for development in lower-density areas and achieving greater efficiency in the provision and use of services and infrastructure. The additional employment opportunities would increase the number of jobs adjacent to residential areas and public transit, which would support City and regional policies intended to reduce VMT. The new jobs would bolster the local economy and bring new jobs to a lower-density area with few existing jobs.”

Section IV.I, Population and Housing, page IV.I-30, revise the first paragraph (between Tables IV.I-9 and IV.I-10) as follows:

“**Table IV.I-10, Cumulative Flexibility Option Population, Housing, and Employment Impacts in the City of Los Angeles (Flexibility Option)**, compares projected cumulative growth within the City, inclusive of the Flexibility Option, to the ~~2040-2045~~ horizon year projections in the ~~2016-2040~~2020-2045 RTP/SCS. As discussed above, projections focus on the ~~2040-2045~~ horizon year as opposed to the Flexibility Option’s 2023 buildout date because SCAG projections incorporate regional policies and are based on long-term demographic trends that average out short-term variations, which may not be reflected in shorter-term 2023 projections.³⁹ In addition, California and the federal government require that SCAG and other regional planning agencies update their respective RTP/SCS every four years. Frequent updates allow SCAG to reflect land use and planning changes that have occurred since previous updates in order to present the most accurate long-term projections. Accordingly, the long-term projections, not the interim projections, are the most accurate reflections of the development changes within the region.”

Section IV.I, Population and Housing, page IV.I-30, revise Table IV.I-10, Cumulative Flexibility Option Population, Housing, and Employment Impacts in the City of Los Angeles (Flexibility Option) as follows:

Table IV.I-10
Cumulative Flexibility Option Population, Housing, and Employment Impacts
in the City of Los Angeles (Flexibility Option)

	Cumulative Increase ^a	SCAG Projected Growth ^b	Cumulative Percentage of Growth
Population	5,465	549,735 <u>711,635</u>	1.0 <u>0.8</u>
Housing Units	13,226	209,874 <u>312,574</u>	6.3 <u>4.2</u>
Employment	15,064	310,128 <u>267,686</u>	4.9 <u>5.6</u>
<i>a From Table IV.I-7.</i> <i>b From Table IV.I-1.</i> <i>Source (table): EcoTierra Consulting, 2020-January 2021.</i>			

Section IV.I, Population and Housing, pages IV.I-30 and IV.I-31, revise the last paragraph beginning on page IV.I-30 as follows:

“As indicated in **Table IV.I-8**, the cumulative population growth of 5,465 people would represent ~~1.0~~ 0.8 percent of SCAG’s population growth estimate for the ~~2040~~ 2045 horizon year; the cumulative housing growth of 13,226 units would represent ~~6.3~~ 4.2 percent of SCAG’s housing growth estimate; and the cumulative employment growth of 15,064 jobs would represent ~~4.8~~ 5.6 percent of SCAG’s employment growth estimate. Accordingly, the cumulative growth would be within SCAG’s long-range projections for the City identified in the ~~2016-2040~~ 2020-2045 RTP/SCS.”

Section IV.I, Population and Housing, page 31, revise the first full paragraph as follows:

“As under the Project, the smaller increase in population (~~1.0~~ 0.8 percent) and housing units (~~6.3~~ 4.2 percent) show that the City is generating more housing than population to help meet the existing housing deficit. Additionally, the increases in the number and variety of housing units and employment opportunities in the Flexibility Option vicinity would provide housing and jobs in proximity to public transit, which would be consistent with regional and City policies to focus development in areas well served by public transit. The increase in housing stock in the City provides opportunities for residents to locate within an HQTAs and within proximity to transit facilities, thereby reducing the demand for development in lower-density areas and achieving greater efficiency in the provision and use of services and infrastructure. The additional employment opportunities would increase the number of jobs adjacent to residential areas and public transit, which would support City and regional policies intended to reduce VMT. The new jobs would bolster the local economy and bring new jobs to a lower-density area with few existing jobs.”

IV.J.1. Public Services – Fire Protection

No corrections or additions have been made to this section of the Draft EIR.

IV.J.2. Public Services – Police Protection

Section IV.J.2, Public Services – Police Protection, pages IV.J-38 and IV.J-39, under i) Construction, revise the fourth paragraph as follows:

“Furthermore, the Project is estimated to require a net export of approximately 74,500 cubic yards of soil, and thus, would require a haul route permit. The anticipated outbound haul route from the Project Site would be south on ~~Mateo-Imperial~~ Street and east on E. 7th Street to the Golden State Freeway (I-5), and the anticipated inbound haul route to the Project Site would be exiting the I-10 from Exit 16A (~~Santa Fe Avenue~~)~~toward Santa Fe Avenue and Mateo Street, west east~~ onto E. 8th Street, and north onto Mateo Street north on Santa Fe Avenue to Jesse Street, west on Jesse Street, and south onto Imperial Street. Exported materials would likely be disposed at Sunshine Canyon Landfill in Sylmar. Hauling of material from the Project Site would occur on weekdays between 7:00 AM. and 6:00 PM (i.e., a 12-hour period) and Saturdays between 8:00 AM and 2:00 PM (i.e., an 8-hour period).”

IV.J.3. Public Services – Schools

Section IV.J.3, Public Services - Schools, page IV.J-64, after (i) construction, revise the first paragraph after the bullets as follows:

“As a result, it is likely that the skilled workers anticipated to work on the Project already reside within the region and would not need to relocate as a result of employment. Furthermore, construction activity associated with the 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 Project occupancy/buildout not result in an adverse physical change in the environment. The nearest school to the Project Site is Metropolitan High School, located at 727 Wilson Street, approximately 0.3 mile southwest of the Site. The construction of the Project would not require the closure of any vehicle travel lanes. Temporary closures of the sidewalks adjacent to the Project Site on Mateo Street and Imperial Street may be required during portions of the construction period. Furthermore, the anticipated outbound haul route from the Project Site would be south on ~~Mateo-Imperial~~ Street and east on E. 7th Street to the Golden State Freeway (I-5), and the anticipated inbound haul route to the Project Site would be exiting the I-10 from Exit 16A (~~Santa Fe Avenue~~)~~toward Santa Fe Avenue and Mateo Street, west east~~ onto E. 8th Street, and north onto Mateo Street north on Santa Fe Avenue to Jesse Street, west on Jesse Street, and south onto Imperial Street. However, these temporary sidewalk closures and the anticipated haul routes would not adversely affect Metropolitan High School due to its location, which is located southwest of the Project Site. **Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts would not necessitate the expansion or**

construction of new school facilities, and therefore Project construction impacts would be less than significant; no mitigation measures are required.”

Section IV.J.3, Public Services - Schools, page IV.J-69, revise the first paragraph as follows:

“As a result, it is likely that the skilled workers anticipated to work on the Flexibility Option already reside within the region and would not need to relocate as a result of employment. Furthermore, construction activity associated with the Flexibility Option 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 project occupancy/buildout not result in an adverse physical change in the environment. The nearest school to the Project Site is Metropolitan High School, located at 727 Wilson Street, approximately 0.3-mile southwest of the Site. The construction of the Project would not require the closure of any vehicle travel lanes. Temporary closures of the sidewalks adjacent to the Project Site on Mateo Street and Imperial Street may be required during portions of the construction period. Furthermore, the anticipated outbound haul route from the Project Site would be south on ~~Mateo~~-Imperial Street and east on E. 7th Street to the Golden State Freeway (I-5), and the anticipated inbound haul route to the Project Site would be exiting the I-10 from Exit 16A (~~Santa Fe Avenue~~)~~toward Santa Fe Avenue and Mateo Street, west east~~ onto E. 8th Street, and ~~north onto Mateo Street north on Santa Fe Avenue to Jesse Street, west on Jesse Street, and south onto Imperial Street.~~ However, these temporary sidewalk closures and anticipated haul routes would not adversely affect Metropolitan High School due to its location, which located southwest of the Project Site. **Therefore, the construction employment generated by the Flexibility Option would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts would not necessitate the expansion or construction of new school facilities, and therefore Project construction impacts would be less than significant; no mitigation measures would be required.”**

IV.J.4. Public Services – Parks and Recreation

No corrections or additions have been made to this section of the Draft EIR.

IV.J.5. Public Services – Libraries

Section IV.J-5, Public Services – Libraries, page IV.J-117, revise second full paragraph as follows:

“Similar to the Project, the related residential projects, which would generate 12,841 residents, would be subject to the standards to determine demand for library facilities used by the City. There are no currently planned improvements to add capacity through expansion to existing libraries and no plans for the development of any other new libraries to serve the Project community.¹⁴⁷ However, similar to the Project, each Related Project, and other future development in the Central City North Community Plan area would generate revenues to the City’s General Fund (in the form of property taxes, sales tax,

business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. These revenues to the General Fund would help offset the increase in demand for library services as a result of the Project and the Related Projects. ~~However, similar to the Project, each Related Project, and other future development in the Central City North Community Plan area would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. These revenues to the General Fund would help offset the increase in demand for library services as a result of the Project and the Related Projects.~~ If LAPL determines that new facilities are necessary at some point in the future, it is reasonably anticipated that such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and one acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332 and would not be expected to result in significant impacts.

IV.K. Transportation

Section IV.K, Transportation, page IV.K-3, revise heading (b) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, as follows

“(b) ~~2016-2040~~ 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy”

Section IV.K, Transportation, page IV.K-3, under (b) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, revise as follows:

“On ~~April 7, 2016~~ September 3, 2020, the SCAG Regional Council adopted the ~~2016-2040~~ 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 2020-2045 RTP/SCS): *Towards a Sustainable Future* Connect SoCal.³ The ~~2016-2040~~ 2020-2045 RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region's residents. Building on the previous 2016-2040 RTP/SCS ~~For the first time, SCAG has integrated~~ integrates land use, housing, and environmental strategies with transportation planning to help meet emissions reduction targets set by the California Air Resources Board (CARB), as required by SB 375. The ~~2016-2040~~ 2020-2045 RTP/SCS provides an alternative to “business as usual” development. It encourages community revitalization and neighborhoods that are bike and pedestrian friendly, with convenient access to transit. Approved by state and federal agencies in ~~April 2016~~ September 2020, the ~~2016-2040~~ 2020-2045 RTP/SCS includes approximately ~~\$556.5~~ \$638.9 billion in projected funding for transportation projects for Los Angeles County.

The ~~2016-2040~~ 2020-2045 RTP/SCS contains a plan to provide adequate highway, transit, rail, aviation, and goods movement infrastructure to meet the region's needs through ~~2040~~ 2045. The ~~2016-2040~~ 2020-2045 RTP/SCS is linked to Los Angeles County

transportation plans and models in the form of shared growth and travel projections. As such, the ~~2016-2040-2020-2045~~ RTP/SCS is guided by and incorporates all projects from Metro's own Long-Range Transportation Plan. The ~~2016-2040-2020-2045~~ RTP/SCS includes goals and policies applicable to transportation and, in some cases, land use projects.

~~On September 3, 2020, SCAG approved and adopted the Connect SoCal 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS is currently pending certification by the California Air Resources Board (CARB). Similar to the 2016-2040 RTP/SCS, the newly adopted 2020-2045 RTP/SCS encompasses, builds upon and expands previous SCAG RTP/SCS plans' land use and transportation strategies to improve mobility options and achieve a more sustainable growth pattern. The 2020-2045 RTP/SCS lays out a strategy for the region to meet CARB greenhouse gas reduction targets at eight percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. In addition, the plan anticipates a five percent decrease in daily miles driven per capita from 2016 to 2045. Additional information regarding Project compliance with the RTP/SCS can be found in **Section IV.G, Land Use and Planning**, of this Draft EIR."~~

Section IV.K, Transportation, page IV.K-3, change footnote 3 to read:

³ *Southern California Association of Governments, ~~2016-2040~~ 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy: ~~Towards a Sustainable Future~~ Connect SoCal.*

Section IV.K, Transportation, page IV.K-22, under (c) Project Design Features, revise Project Design Feature **PDF TR-1** as follows:

PDF TR-1 **Construction Staging and Traffic Management Plan.** Prior to the issuance of a building permit for the Project, a detailed Construction Staging and Traffic Management Plan (CSTMP) would be submitted to LADOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. The plan would 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. The ~~Construction Staging and Traffic Management Plan (CSTMP)~~ would formalize how construction would be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CSTMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction related project representatives (i.e., construction contractors) whose projects will potentially be under construction at around the same time as the Project shall be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The CSTMP would include, but not be limited to, the following elements as appropriate:

- Emergency access shall be maintained to the Project Site during construction through marked emergency access points approved by the LAFD.
- Construction worker parking on nearby residential streets shall be prohibited.
- Worker parking shall be provided on-site or in designated off-site public parking areas.
- Temporary traffic control during all construction activities adjacent to public rights-of-way shall be provided to improve traffic flow on public roadways (e.g., flag men).
- Construction-related deliveries, haul trips, etc., shall be scheduled so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets.
- Construction-related vehicles shall be prohibited from parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists shall be obtained through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools, particularly Metropolitan High School.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.
- In the event of a lane or sidewalk closure, traffic and/or pedestrians shall be routed around any such lane or sidewalk closures.
- The locations of the off-site truck staging shall be identified to include, staging in a legal area, which would most likely be Imperial Street and Jesse Street, and which would detail measures to ensure that trucks use the specified haul route, and do not travel through residential neighborhoods.
- There would be coordination with nearby projects that have potential overlapping construction timeframes, to schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on the surrounding streets.

- Contractors will maintain ongoing communication with LAUSD school administrators and the LAUSD Transportation Section, providing sufficient notice to forewarn children and parents when existing vehicle routes and existing pedestrian routes to schools may be impacted.
- Funding for crossing guards at the contractor's expense will be required when safety of children may be compromised by construction-related activities at impacted school crossings.

Section IV.K, Transportation, page IV.K-24, **PDF TR-2 Transportation Demand Management Program**, revise as follows:

~~“(1) Project and Flexibility Option~~

PDF TR-2 Transportation Demand Management Program. A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The TDM program shall include, but shall not be limited to, the following strategies:

- Reduced Parking Supply. This strategy changes the on-site parking supply to provide less than the amount of vehicle parking required by direct application of the Los Angeles Municipal Code (LAMC) without consideration of parking reduction mechanisms permitted in the code.
- Include Bike Parking per Los Angeles Municipal Code. This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations.

Section IV.K, Transportation, page IV.K-28, revise the third full paragraph as follows:

~~“The Project would comply with existing applicable City ordinances (e.g., the City’s existing TDM Ordinance, referred to in LAMC Section 12.26.J). As outlined in more detail above under subheading Mitigation Measures MM TR-1 Project Design Features, Project Design Feature PDF-TR-2 (Transportation Demand Management Program), a preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this Project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the Project. **Therefore, the Project and the Flexibility Option would not conflict with applicable City ordinances.**”~~

Section IV.K, Transportation, page IV.K-28, under (c) Other Programs, Ordinances, and Policies, revise the paragraph as follows:

“Several other programs, plans, ordinances, and policies that are previously mentioned in the regulatory setting and are applicable to the Project are discussed in more detail in **Section IV.G, Land Use and Planning**, of this Draft EIR. More specifically, the ~~2016-2040~~ 2020-2045 RTP/SCS, the City of Los Angeles General Plan Framework, the

Walkability Checklist, and the Citywide and Downtown Design Guidelines all contain goals and policies applicable to transportation and, in some cases, land use projects. Impacts were determined to be less than significant. **Therefore, the Project or Flexibility Option operation-related traffic would not conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Project or Flexibility Option operation traffic impacts would be less than significant. No mitigation measures would be required.**

Section IV.K, Transportation, page IV.K-35, under (2) Vehicle Miles Traveled Analysis, revise the first paragraph as follows:

“As stated in the City’s TAG document (refer to page 20 of the TAG), analyses should consider both short-term and long-term project effects on VMT. Short-term effects are evaluated in the detailed project-level VMT analysis summarized above. Long-term, or cumulative, effects are determined through a consistency check with the ~~2016-2040-2020-2045~~ RTP/SCS. The ~~2016-2040-2020-2045~~ RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets.⁴⁹ As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the ~~2016-2040-2020-2045~~ RTP/SCS does not specify any development may indicate a significant impact on transportation. As previously discussed, the Project would result in daily household and daily work VMT impacts that are less than significant.”

Section IV.K, Transportation, page IV.K-35, revise footnote 19 as follows:

¹⁹ ~~As discussed in the regulatory setting above, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020-2045 RTP/SCS. It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project’s consistency with the 2016-2040 RTP/SCS. [deleted].~~

IV.L. Tribal Cultural Resources

No corrections or additions have been made to this section of the Draft EIR.

IV.M.1. Utilities and Service Systems – Water Supply and Infrastructure

Section IV.M-1, Utilities and Service Systems – Water Supply and Infrastructure, page IV.M-26, under (i) Construction, revise the second paragraph as follows:

“The Project would require construction of new, on-site water distribution lines to serve the new building. Construction impacts associated with the installation of water distribution

lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depth of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Activities associated with the installation of the water distribution lines would be in accordance with the actions and procedures outlined in the Project's Construction Staging and Traffic Management Plan (CSTMP) (see PDF TR-1 in **Section IV.K, Transportation**, of this Draft EIR). **Therefore, the Project's impacts on water supply and water infrastructure associated with construction activities would be less than significant. No mitigation measures are required."**

Section IV.M-1, Utilities and Service Systems – Water Supply and Infrastructure, page IV.M-31, under (i) Construction, revise the second paragraph as follows:

"Similar to the Project, the Flexibility Option would require construction of new, on-site water distribution lines to serve the new building. Prior to ground disturbance, contractors would coordinate with LADWP to identify the locations and depth of all lines and would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. **Therefore, the Flexibility Option's impacts on water supply and water infrastructure associated with construction activities would be less than significant. No mitigation measures are required."**

Section IV.M-1, Utilities and Service Systems – Water Supply and Infrastructure, page IV.M-35, revise the second full paragraph as follows:

"There are 20 Related Projects, which consist of residential, commercial, schools, retail, restaurants, museums, hotels, and office uses. As shown in **Table IV.M.1-5, Estimated Daily Water Consumption of the Related Projects**, the total increase in water demand for the Related Projects is approximately 1.86 million gallons per day (~~mgpd~~ mgd). Combined with the Project, the net increase in water demand is approximately 1.90 mgd. The LADWP 2015 UWMP has estimated a water demand of 475 mgd by the year 2025, which means the Project combined with the Related Projects would account for approximately 0.40 percent of the total daily demand."

Section IV.M-1, Utilities and Service Systems – Water Supply and Infrastructure, page IV.M-36, revise the first paragraph as follows:

"Development of the Project and future new development in the vicinity of the Project Site would cumulatively increase demands on the existing water infrastructure system. Similar to the Project, Related Projects would be subject to ~~LADPW~~ LADWP review to assure the existing public infrastructure would be adequate to meet the domestic and fire water demands of each project and individual projects would be subject to LADWP and City requirements regarding infrastructure improvements needed to meet respective water

demands, flow and pressure requirements. LADWP confirmed that six nearby hydrants that serve the Project Site provide sufficient flow and pressure to satisfy the needs of the fire suppression for the Project. Furthermore, LADWP through the five year updates of the LADWP 2015 UWMP, Los Angeles Department of Public Works, and the LAFD project specific checks would conduct on-going evaluations of its infrastructure.”

Section IV.M-1, Utilities and Service Systems – Water Supply and Infrastructure, page IV.M-37, revise the second full paragraph as follows:

“There are 20 Related Projects, which consist of residential, commercial, schools, retail, restaurants, museums, hotels, offices, industrial, medical offices, gyms, cinemas, and event space. The total increase in water demand for the Related Projects is approximately 1.86 ~~mgd~~ mgd. As shown in **Table IV.M.1-5, Estimated Daily Water Consumption of the Related Projects**, combined with the Flexibility Option, the net increase in water demand would be approximately 1.90 mgd. The 2015 Urban Water Management plan has estimated a water demand of 475 mgd by the year 2025, which means the Flexibility Option combined with the Related Projects would account for approximately 0.40 percent of the total daily demand.”

IV.M.2. Utilities and Service Systems – Wastewater

No corrections or additions have been made to this section of the Draft EIR.

IV.M.3. Utilities and Service Systems – Solid Waste

Section IV.M.3, Utilities and Service Systems – Solid Waste, page IV.M-72, under b) Methodology, revise the paragraph as follows:

“The environmental impacts of the Project with respect to solid waste are determined based on the proposed increase in solid waste generation and the capacity of existing and proposed solid waste infrastructure. The existing landfill capacities and solid waste generation is compared to the Project’s solid waste generation and future landfill capacities, including a discussion of recycling programs and design features that would be implemented with the Project. Projected solid waste generation and future landfill capacities are provided in the SWIRP, which is a 20-year master plan to reduce waste, increase recycling, and manage trash in the City. Project solid waste generation estimates are based on generation rates provided by the Bureau of Sanitation, as detailed in the 2006 L.A. CEQA Thresholds Guide.¹⁰⁴”

Section IV.M-3, Utilities and Service Systems – Solid Waste, page IV.M-72, revise footnote 104 as follows:

¹⁰⁴ ~~City of Los Angeles, Board of Public Works, Bureau of Sanitation, “Solid Waste Generation,” 1981. [deleted].~~

IV.M.4. Utilities and Service Systems – Electric Power, Natural Gas, and Telecommunication

No corrections or additions have been made to this section of the Draft EIR.

IV.N. Energy Conservation

Section IV.N, Energy, pages IV.N-9 and IV.N-10, under (3) Regional, replace the entire discussion with:

“Pursuant to Government Code Section 65080(b)(2)(B), SCAG must prepare a RTP/SCS which (1) identifies the general location of uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Government Code Section 65584; (4) identify a transportation network to service the transportation needs of the region; (5) gather and consider the best practically available scientific information regarding resource areas and farmland in the region; and (6) consider the state housing goals specified in Sections 65580 and 65581; (7) set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the GHG emissions from automobiles and light trucks to achieve the GHG reduction targets approved by the state board; and (8) allow the RTP to comply with air quality conformity requirements under the federal Clean Air Act.

On September 3, 2020, SCAG’s Regional Council adopted the 2020–2045 RTP/SCS. On October 30, 2020, CARB accepted SCAG’s determination that the SCS would achieve GHG emission reduction targets. The 2020-2045 RTP/SCS meets federal and state requirements and is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2020-2045 RTP/SCS 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, including land use strategies that focus on urban infill growth and walkable, mixed-use communities in existing urbanized and opportunity areas. More mixed-use, walkable, and urban infill development would be expected to accommodate a higher proportion of growth in more energy-efficient housing types like townhomes, apartments, and smaller single-family homes, as well as more compact commercial buildings types. Furthermore, the 2020-2045 RTP/SCS includes transportation investments and land use strategies that encourage carpooling, increased transit use, active transportation opportunities, and promote more walkable and mixed-use communities which would potentially help to offset passenger VMT.”

Section IV.N, Energy, page IV.N-17, revise the first paragraph (following the numbered list) as follows:

“With regard to Threshold (b), the Project is evaluated for consistency with adopted energy conservation plans and policies relevant to the Project. Such adopted energy conservation plans and policies include Title 24 energy efficiency requirements, CALGreen Standards and City building codes. While not an adopted plan, L.A.’s Green New Deal (Sustainable City pLAn 2019) accelerates GHG-reduction goals through milestones and initiatives to, among other things, increase renewable energy supply and reduce building energy use, water consumption, and per capita VMT, including through reduction in the amount of solid waste generated. Also, as discussed in **Section IV.D, Greenhouse Gas Emissions**, of this Draft EIR, the Project would be consistent with the SCAG ~~2016-2040~~ 2020-2045 RTP/SCS, which includes goals to reduce VMT and corresponding reduction in fuel consumption.”

Section IV.N, Energy, page IV.N-33, under (vi) The project’s projected transportation energy use requirements and its overall use of efficient transportation alternatives, revise the first two paragraphs of the subsection as follows:

“The ~~2016-2040~~ 2020-2045 RTP/SCS presents the transportation vision for the region through the year ~~2040-2045~~ and provides a long-term investment framework for addressing the region’s transportation and related challenges. As discussed in **Sections IV.A, Air Quality, IV.D, Greenhouse Gas Emissions, IV.G, Land Use and Planning, and IV.K, Transportation**, of this Draft EIR, the Project would be generally consistent with and would not conflict with the general land use designation, density, and building intensity outlined in the ~~2016-2040~~ 2020-2045 RTP/SCS. ~~Using data collected from local jurisdictions, including General Plans, SCAG categorized existing land uses into “land use types” and then classified sub-regions into one of three land use development categories: urban, compact, or standard. SCAG used each of these three categories to describe the conditions that exist and/or are likely to exist within each specific area of the region.⁷⁵ As shown in Exhibit 13 of the 2016-2040 RTP/SCS Background Documentation, SCAG categorized the area surrounding the Project Site as a compact walkable area, generally defined as an area of new growth on the urban edge or large-scale redevelopment well served by regional and local transit service.⁷⁶~~ The Project would be consistent with and would not conflict with SCAG’s land use types for the area and would encourage the use of alternative modes of transportation, which could result in a reduction in overall VMT of approximately 35 percent relative to a comparable project that has the same land uses and quantities as the Project, but does not have the location-specific nor the Project design-specific benefits nor the infill nature of the Project that would lead to VMT and trip reductions.⁷⁷ The Project Site is located at an infill location in developed, active area of the Central City North community that contains a mix of existing industrial, commercial, office, and residential uses. The Project would be located in an area well-served by public transit. Specifically, the Project Site is served by Metro Local Lines 18, 53, 60, 62, 66 and Metro Rapid 720 and 760. ~~Additionally, the~~ The Project Site is also located approximately

one mile south of the Metro Gold Line Little Tokyo/Arts District Station. Additionally, the Project Site is in proximity to several transit investment projects in planning and construction phases, including the Regional Connector and Gold Line Arts District station relocation, expansion of the West Santa Ana line into the Arts District, and recently added DASH stops by LADOT to improve service in the Arts District. The Project would also provide bicycle storage areas for Project residents, visitors, and employees. Furthermore, the Project would provide 10 percent of its provided parking spaces with chargers for electric vehicles and 30 percent of its provided parking with conduit to accommodate installation of future chargers for electric vehicles, thereby further reducing consumption of petroleum-based fuels.

~~As discussed in the regulatory setting above, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. It should be noted that the circulation of the Notice of Preparation (NOP) for the Project was on February 23, 2018, which was prior to the adoption of the 2020–2045 RTP/SCS and, therefore, the analysis focuses on the Project’s consistency with the 2016–2040 RTP/SCS. However, as the 2020–2045 RTP/SCS encompasses and builds upon the previous RTP/SCS, many of the same goals and strategies are similar between the two plans. As demonstrated above, the Project would be located in an area well-served by public transit provided by Metro, as well as is in proximity to several transit investment projects in planning and construction phases, including the Regional Connector and Gold Line Arts District station relocation, expansion of the West Santa Ana line into the Arts District, and recently added DASH stops by LADOT to improve service in the Arts District; the The Project is comprised of a mix of uses, including commercial uses and 185 live/work units, including eleven percent set aside for (approximately 20 live/work units) deed restricted Very Low Income households; and would create a pedestrian-friendly environment through an active and transparent ground-floor design and by providing a landscaped paseo connecting Mateo Street and Imperial Street. Furthermore, the integration of land uses on the Project Site would produce substantial reductions in auto mode share to and from the Project Site that would help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions, and would therefore not conflict with the goals of the 2020-2045 RTP/SCS.”~~

Section IV.N, Energy, page IV.N-34, revise footnote 75 as follows:

⁷⁵ ~~*Southern California Association of Governments, 2016–2040 RTP/SCS, April 2016, pages 20–21-[deleted].*~~

Section IV.N, Energy, page IV.N-34, revise footnote 76 as follows:

⁷⁶ ~~*Southern California Association of Governments, 2016–2040 RTP/SCS Background Documentation, April 2016, Exhibit 13 and page 42-[deleted].*~~

Section IV.N, Energy, pages IV.I-37 and IV.I-38, under (b) Petroleum-Based Fuels, revise the second paragraph as follows:

“The Project would also be consistent with and not in conflict with regional planning strategies that address transportation fuel conservation. As discussed above, SCAG’s ~~2016-2040~~ 2020-2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the ~~2016-2040~~ 2020-2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, encouraging the reduction of building energy use, and increasing use of renewable sources. The Project’s mixed-use design and its increase in density located on an infill site in proximity to transit, including rail and bus lines, its proximity to existing off-site retail, grocery, restaurant, office, and residential uses, and its walkable and bike-able environment support the conclusion from this analysis that the Project has been properly designed and located so that its development would achieve a reduction in VMT compared to a project with the same land uses that does not have the location-specific nor the Project design-specific benefits nor the infill nature of the Project. These land use characteristics would minimize the Project’s VMT and are included in the transportation fuel demand for the Project’s mobile sources. Such reductions in VMT would also be consistent with the goals of L.A.’s Green New Deal (Sustainable City pLAn 2019), which, while not an adopted regulatory plan, accelerates GHG reduction targets through milestones and initiatives designed to increase housing built in close proximity to transit as well as reduce per capita VMT, including through reductions and eventual elimination of solid waste generation.”

Section IV.N, Energy, page IV.N-51, under (vi) The project’s projected transportation energy use requirements and its overall use of efficient transportation alternatives, revise the first two paragraphs as follows:

“The ~~2016-2040~~ 2020-2045 RTP/SCS presents the transportation vision for the region through the year ~~2040~~ 2045 and provides a long-term investment framework for addressing the region’s transportation and related challenges. As discussed in **Sections IV.A, Air Quality, IV.D, Greenhouse Gas Emissions, IV.G, Land Use and Planning, and IV.K, Transportation**, of this Draft EIR, as for the Project, the Flexibility Option would be generally consistent with and would not conflict with the general land use designation, density, and building intensity outlined in the SCAG ~~2016-2040~~ 2020-2045 RTP/SCS. ~~Using data collected from local jurisdictions, including General Plans, SCAG categorized existing land uses into “land use types” and then classified sub-regions into one of three land use development categories: urban, compact, or standard. SCAG used each of these three categories to describe the conditions that exist and/or are likely to exist within each specific area of the region.⁴⁰⁷ As shown in Exhibit 13 of the 2016-2040 RTP/SCS Background Documentation, SCAG categorized the area surrounding the Project Site as a compact walkable area, generally defined as an area of new growth on the urban edge or large-scale redevelopment well served by regional and local transit service.⁴⁰⁸ The~~

Flexibility Option would be located on the same Project Site as the Project and, accordingly, would be also consistent with and would not conflict with SCAG's land use types for the area. As with the Project, the Flexibility Option would encourage the use of alternative modes of transportation, which could result in a reduction in overall VMT of approximately 35 percent relative to a comparable project that has the same land uses and quantities as the Flexibility Option, but does not have the location-specific nor the Flexibility Option design-specific benefits nor the infill nature of the Flexibility Option that would lead to VMT and trip reductions.¹⁰⁹ Because it would be located on the same Project Site as the Project, the Flexibility Option would be located in the same developed, active area the contains the same mix of existing industrial, commercial, office, and residential uses and would be served by the same transit and planned transit expansions/improvements.¹¹⁰ As with the Project, the Flexibility Option would also provide bicycle storage areas for residents, visitors, and employees. Furthermore, the Flexibility Option would provide 10 percent of its provided parking spaces with chargers for electric vehicles and an additional 30 percent of its provided parking with conduit to accommodate installation of future chargers for electric vehicles, thereby further reducing consumption of petroleum-based fuels.

~~As discussed in the regulatory setting above, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. It should be noted that the circulation of the Notice of Preparation (NOP) for the Project was on February 23, 2018, which was prior to the adoption of the 2020–2045 RTP/SCS and, therefore, the analysis focuses on the Flexibility Option's consistency with the 2016–2040 RTP/SCS. However, as the 2020–2045 RTP/SCS encompasses and builds upon the previous RTP/SCS, many of the same goals and strategies are similar between the two plans. As demonstrated above, the Flexibility Option would be located in an area well served by public transit provided by Metro, as well as is in proximity to several transit investment projects in planning and construction phases, including the Regional Connector and Gold Line Arts District station relocation, expansion of the West Santa Ana line into the Arts District, and recently added DASH stops by LADOT to improve service in the Arts District; Similar to the Project, the Flexibility Option is comprised of a mix of uses, including commercial uses and 159 live/work units, including eleven percent set aside for (approximately 18 live/work units) deed restricted Very Low Income households; and would create a pedestrian-friendly environment through an active and transparent ground-floor design and by providing a landscaped paseo connecting Mateo Street and Imperial Street. Furthermore, the integration of land uses on the Project Site would produce substantial reductions in auto mode share to and from the Project Site that would help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions, and would therefore not conflict with the goals of the 2020-2045 RTP/SCS."~~

Section IV.N, Energy, page IV.N-51, revise footnote 107 as follows:

¹⁰⁷ ~~*Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016, pages 20-21-[deleted].*~~

Section IV.N, Energy, page IV.N-51, revise footnote 108 as follows:

¹⁰⁸ ~~*Southern California Association of Governments, 2016-2040 RTP/SCS Background Documentation, April 2016, Exhibit 13 and page 42-[deleted].*~~

Section IV.N, Energy, page IV.N-55, under (b) Petroleum-Based Fuels, revise the first full paragraph as follows:

“The Flexibility Option would also be consistent with and not in conflict with regional planning strategies that address transportation fuel conservation. As discussed above, SCAG’s ~~2016-2040~~ 2020-2045 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the ~~2016-2040~~ 2020-2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, encouraging the reduction of building energy use, and increasing use of renewable sources. The Flexibility Option’s mixed-use design and its increase in density located on an infill site in proximity to transit, including rail and bus lines, its proximity to existing off-site retail, grocery, restaurant, office, and residential uses, and its walkable and bike-able environment would minimize the Flexibility Option’s VMT and are included in the transportation fuel demand for the Flexibility Option’s mobile sources. Such reductions in VMT would also be consistent with the goals of L.A.’s Green New Deal (Sustainable City pLAn 2019), which, while not an adopted regulatory plan, accelerates GHG reduction targets through milestones and initiatives designed to increase housing built in close proximity to transit as well as reduce per capita VMT, including through reductions and eventual elimination of solid waste generation.”

Section IV.N, Energy, page IV.N-59, under (ii) Natural Gas, revise the first paragraph as follows:

“Buildout of the Project, Related Projects, and additional forecasted growth in SoCalGas’ service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas’ planning area will be approximately 2,480 million cf per day in 2023.¹¹⁸ As previously indicated, the Project’s natural gas demand of 14,107 cf per day would account for approximately 0.0006 percent of the 2023 forecasted consumption in SoCalGas’ planning area, and in general, each Related Project would be expected to comprise a similarly limited percentage of overall natural gas consumption. As with the Project, Related Projects would be required to evaluate energy impacts during construction and operation related to the wasteful, inefficient, or unnecessary use of natural gas, incorporate energy conservation features, comply with applicable regulations including the City’s Green Building Code, the Title 24

standards, and CALGreen Standards, and incorporate mitigation measures, as necessary under CEQA. Related Projects, as with the Project, would also be required to evaluate potential impacts related to local and regional supplies or capacity based on regional growth plans, such as the ~~2016-2040~~ 2020-2045 RTP/SCS, and SoCalGas energy supply projections for long-term planning.”

Section IV.N, Energy, page IV.N-60, under (iii) Transportation-Related Energy, revise the first and second paragraphs as follows:

“Buildout of the Project, Related Projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. At buildout, the Project’s estimated net petroleum-based fuel usage would be approximately 106,411 gallons of gasoline and 10,328 gallons of diesel per year. For comparison purposes, the net fuel usage during Project operation would represent approximately 0.003 percent of the 2023 (i.e., the Project’s buildout year) annual on-road gasoline-related energy consumption and 0.002 percent of the 2023 annual diesel fuel-related energy consumption in Los Angeles County, as projected by CARB’s EMFAC on-road vehicle emissions factor model.¹¹⁹ While it is speculative to assess transportation fuel usage from Related Projects, in general, each Related Project would be expected to comprise a similarly limited percentage of Countywide fuel consumption. Furthermore, the Project would be consistent with the policies set forth in the ~~2016-2040~~ 2020-2045 RTP/SCS. Related Projects in the Project vicinity would also be infill projects locating uses near other residential and commercial uses which would reduce distance travelled as well as consumption of transportation fuel. As with the Project, Related Projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by the ~~2016-2040~~ 2020-2045 RTP/SCS, such as the per capita VMT targets, promotion of alternative forms of transportation, proximity to public transportation options, provisions for encouraging multi-modal and energy efficient transit such as by accommodating bicycle parking and EV chargers at or above regulatory requirements.

By its very nature, the ~~2016-2040~~ 2020-2045 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. Therefore, growth and related transportation-related energy consumption resulting from future operations at many of the Related Projects ~~is~~ are accounted for in SCAG’s regional planning projections.”

Section IV.N, Energy, page IV.N-62, under (ii) Natural Gas, revise the first paragraph as follows:

“As previously indicated, the Flexibility Option’s natural gas demand of 13,954 cf per day would account for approximately 0.0006 percent of the 2023 forecasted consumption in SoCalGas’ planning area, and in general, each Related Project would be expected to comprise a similarly limited percentage of overall natural gas consumption. As with the Flexibility Option, Related Projects would be required to evaluate energy impacts during construction and operation related to the wasteful, inefficient or unnecessary use of natural

gas, incorporate energy conservation features, comply with applicable regulations including the City’s Green Building Code, the Title 24 standards and CALGreen Standards, and incorporate mitigation measures, as necessary under CEQA. Related Projects, as with the Flexibility Option, would also be required to evaluate potential impacts related to local and regional supplies or capacity based on regional growth plans, such as the ~~2016-2040-2020-2045~~ RTP/SCS, and SoCalGas energy supply projections for long-term planning.”

Section IV.N, Energy, page IV.N-62 and IV.N-63, revise the first and second paragraphs as follows:

“At buildout, the Flexibility Option’s estimated net petroleum-based fuel usage would be approximately 106,534 gallons of gasoline per year, and 10,341 gallons of diesel per year. For comparison purposes, the net fuel usage during Project operation would represent approximately 0.003 percent of the 2023 (i.e., the Flexibility Option buildout year) annual on-road gasoline-related energy consumption and 0.002 percent of the 2023 annual diesel fuel-related energy consumption in Los Angeles County.¹²⁴ While it is speculative to assess transportation fuel usage from Related Projects, in general, each Related Project would be expected to comprise a similarly limited percentage of Countywide fuel consumption. Furthermore, the Flexibility Option would be consistent with the policies set forth in the ~~2016-2040-2020-2045~~ RTP/SCS. Related Projects in the vicinity would also be infill projects locating uses near other residential and commercial uses which would reduce distance travelled as well as consumption of transportation fuel. As with the Flexibility Option, Related Projects would be required under CEQA to evaluate if their respective developments would conflict with the energy efficiency policies emphasized by the ~~2016-2040-2020-2045~~ RTP/SCS, such as the per capita VMT targets, promotion of alternative forms of transportation, proximity to public transportation options, provisions for encouraging multi-modal and energy efficient transit such as by accommodating bicycle parking and EV chargers at or above regulatory requirements.”

“By its very nature, the ~~2016-2040-2020-2045~~ RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. Therefore, growth and related transportation-related energy consumption resulting from future operations at many of the Related Projects is accounted for in SCAG’s regional planning projections.”

Section IV.N, Energy, page IV.N-64 and IV.N-65, revise the last paragraph as follows:

“Furthermore, as described above, the Project would be consistent with the policies emphasized by the ~~2016-2040-2020-2045~~ RTP/SCS. The Project would be a mixed-use Project and located near public transit which would result in a VMT reduction. As discussed above and in **Section IV.D, Greenhouse Gas Emissions**, of this Draft EIR, the Project would result in a VMT reduction in comparison to a standard project relative to a comparable project that has the same land uses and quantities as the Project, but does not have the location-specific nor the Project design-specific benefits nor the infill nature of the Project, which would be consistent with the VMT reduction goals of the ~~2016-2040~~

2020-2045 RTP/SCS. Related Projects in the Project vicinity would also be infill projects locating uses near other residential and commercial uses which would reduce distance travelled as well as consumption of transportation fuel, consistent with regional planning for cumulative development. **Therefore, as with the Project and the Flexibility Option, Related Projects would also be consistent with adopted plans for energy efficiency and cumulative impacts would be less than significant.**”

IV.O. Wildfire

No corrections or additions have been made to this section of the Draft EIR.

V. Other CEQA Considerations

Section V, Other CEQA Considerations, page V-2, revise the second and third paragraphs as follows:

“The Project would provide an opportunity to fulfill policy directives reflected in both local and regional land use plans by concentrating mixed-use, pedestrian-friendly development, including affordable housing units, in an area that is targeted for higher density, urban growth. The Southern California Association of Governments’ (SCAG) 2016-2040-2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040-2020-2045 RTP/SCS) incorporates planning principles that call for compact, mixed-use, transit-oriented growth focused around city centers and existing transportation corridors, among other design concepts. Specifically, as discussed in **Section IV.G, Land Use**, of this Draft EIR, the Project Site is located in a High-Quality Transit Area (HQTA) as designated by the 2016-2040-2020-2045 RTP/SCS. QTAs are described as generally walkable transit villages or corridors that are within 0.5-mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. Local jurisdictions are encouraged to focus housing and employment growth within QTAs.

~~On September 3, 2020, SCAG approved and adopted the Connect SoCal 2020-2045 RTP/SCS. Similar to the 2016-2040 RTP/SCS, the newly adopted 2020-2045 RTP/SCS encompasses, builds upon and expands previous SCAG RTP/SCS plans’ land use and transportation strategies to improve mobility options and achieve a more sustainable growth pattern. The Project is comprised of 185 live/work units, 20 live/work units deed restricted for Very Low Income households, and commercial uses, and the Project would be located in an urban area well served by public transit provided by Metro, including several transit investment projects in planning phases. Furthermore, the integration of land uses on the Project Site would produce reductions in mode share to and from the Project Site that would help the region accommodate growth and meet the goals of the RTP/SCS that minimize per capita GHG emissions, and would therefore similarly not conflict with the goals of the 2020-2045 RTP/SCS. At the local level, the Project Site is located within a Transit Priority Area (TPA). TPAs are defined as an area within one-half mile of a major transit stop that is existing or planned. A major transit stop is a site~~

containing a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the AM and PM peak commute periods. The Project would be located in an area well-served by existing public transportation, including seven Los Angeles County Metropolitan Transit Authority (Metro) bus lines. The Project Site is located approximately 1-mile from the Metro Gold Line Tokyo/Arts District station. Public bus and rail transit station within the Study Area will also be improved with the Metro Regional Connector project, which will be a 1.9-mile underground light-rail system that will extend from the Metro Gold Line Little Tokyo/Arts District Station to the 7th Street/Metro Center Station, and the West Santa Ana Branch Transit Corridor project, which will be a new 20-mile light rail transit line that would connect downtown Los Angeles to southeast LA County. Thus, the Project would focus growth along major transportation corridors and within walking distance of a transit station.”

Section V, Other CEQA Considerations, page V-4, revise the second paragraph as follows:

“Furthermore, the Project would comply with the Los Angeles Green Building Code, which would reduce resource consumption through compliance with energy efficiency requirements, such as reducing indoor and outdoor water demand, installing energy-efficient appliances and equipment, and complying with California Title 24 Building Energy Efficiency Standards, as adopted by the City. The Project would also meet the mandatory measures of the CALGreen Standards as adopted by the City, by incorporating strategies such as high efficiency toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The heating, ventilation, and air conditioning (HVAC) system would be sized and designed in compliance with the CALGreen Standards to maximize energy efficiency. In addition, the Project would achieve several objectives of the Framework Element, the ~~2016-2040-2020-2045~~ RTP/SCS, and the SCAQMD AQMP for establishing a regional land use pattern that promotes sustainability.”

VI. Alternatives to the Proposed Project

Section VI, Alternatives, page VI-73, revise the third paragraph as follows:

“The general architectural design of Alternative 3 would be similar to the Project. The configuration of Alternative 3 would be different, in order to accommodate ground level parking. Specifically, Alternative 3 would likely cover the majority of the Project Site with ground level parking and therefore would not be able to include the raised live/work complex building at the northwest corner of the Project Site and the associated open space under this building, plus other open space and courtyards that would be provided under the Project and ~~Flex~~-Flexibility Option. An additional difference would be the total square footage and building height, resulting in a commercial development with approximately 12 percent of the mass of the Project. The ground level would be comprised of parking, approximately 11 feet high, and the second level would be comprised of commercial uses, approximately 20 feet, for a two-story building with a height of

approximately 31 feet compared to the Project's proposed eight-story building with a height of 116 feet. There would be no live/work uses and therefore, no affordable housing units, nor would there be open space under Alternative 3."

Section VI, Alternatives, page VI-80, under g) Land Use and Planning, revise the first paragraph as follows:

"The Project Site's current M3 Zone permits commercial uses permitted under the C2 Zone, which would include the commercial and retail and restaurant uses proposed under Alternative 3. Accordingly, Alternative 3 would comply with the Project Site's current zoning designations, including the existing FAR limit of 1.5:1, and would therefore be more consistent with existing land use and zoning designations than the Project. In addition, because Alternative 3 ~~would avoid all the~~ have no significant traffic impacts, ~~when compared to same as~~ the Project, Alternative 3 would also be consistent with transportation policies of SCAG's ~~2016-2040-2020-2045~~ RTP/SCS⁴⁴ for the Project Site ~~to a greater degree than the Project~~. However, Alternative 3 would not provide residential units and would, therefore, not be consistent with the goals of providing needed housing in proximity to existing transit contained in the General Plan Framework and Housing Elements and the Central City North Community Plan. In addition, Alternative 3 would not provide bicycle facilities, or electric vehicle chargers, and would not improve the walkability in the area or increase pedestrian connectivity from Mateo Street to Imperial Street and would; therefore, not be consistent with the goals and objectives of Mobility Plan 2035 and 2010 Bicycle Plan. **Therefore, impacts related to land use under Alternative 3 would be less than significant but greater than the Project's and the Flexibility Option's less-than-significant impacts.**"

Section VI, Alternatives, page VI-80, revise footnote 11 as follows:

¹¹ ~~As discussed throughout this Draft EIR, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020-2045 RTP/SCS. It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020-2045 RTP/SCS, and therefore the analysis focuses on the Project's consistency with the 2016-2040 RTP/SCS.~~ [deleted].

Section VI, Alternatives, page VI-96, revise the last paragraph as follows:

"Alternative 3 would consist of only approximately 23,380 square feet of total floor area, a reduction of approximately 88 percent from the total floor area proposed by the Project, which would only consist of retail and restaurant commercial space and no live/work units or office space. Thus, Alternative 3 would not provide infill redevelopment with an integrated mixed-use project that is economically viable and serves the needs of the Arts District community with new live/work, commercial, and art/production opportunities. Therefore, Alternative 3 would not meet existing market demand for housing or contribute to the burgeoning creative office synergy in the area to the same extent as the Project.

~~Moreover, Alternative 3 would not support regional mobility goals and local regional growth policies by encouraging a mixed-use development in and around activity centers.”~~

Section VI, Alternatives, page VI-104, under g) Land Use and Planning, revise the first paragraph as follows:

“The Project Site’s current M3 Zone permits a range of industrial and manufacturing uses, which would include the industrial use proposed under Alternative 4. Alternative 4 would not require the density bonus for affordable housing. Accordingly, Alternative 4 would comply with the Project Site’s current zoning designations, including the existing FAR limit of 1.5:1, and would therefore be more consistent with existing land use and zoning designations than the Project. Furthermore, Alternative 4 would be consistent with the Industrial Land Use Policies Memo to preserve industrially zoned land. In addition, Alternative 4 would avoid all the significant traffic impacts when compared to the Project and would, therefore, be more consistent with the transportation policies of SCAG’s ~~2016–2040–2020–2045~~ RTP/SCS¹⁵ to a greater degree than the Project. However, Alternative 4 would not provide residential units or commercial uses and would, therefore, not be consistent with the goals of providing needed housing and services in proximity to existing transit contained in the General Plan Framework and Housing Elements and the Central City North Community Plan. In addition, Alternative 4 would not provide pedestrian enhancements along Mateo Street and Imperial Street, bicycle facilities, or electric vehicle chargers, and would not improve the walkability in the area or increase pedestrian connectivity from Mateo Street to Imperial Street and would; therefore, not be consistent with the goals and objectives of Mobility Plan 2035 and 2010 Bicycle Plan. **Therefore, impacts related to land use under Alternative 4 would be less than significant but greater than the Project’s and the Flexibility Option’s less-than-significant impacts.**

Section VI, Alternatives, page VI-104, revise footnote 15 as follows:

¹⁵ ~~As discussed throughout this Draft EIR, on September 3, 2020, SCAG approved and adopted the Connect SoCal 2020–2045 RTP/SCS. It should be noted that the circulation of the NOP for the Project was on February 23, 2018, which was prior to the adoption of the 2020–2045 RTP/SCS, and therefore the analysis focuses on the Project’s consistency with the 2016–2040 RTP/SCS-[deleted].~~

VII. Preparers of the EIR and Persons Consulted

No corrections or additions have been made to this section of the Draft EIR.

VIII. Acronyms and Abbreviations

No corrections or additions have been made to this section of the Draft EIR.

IX. References

Section IX, References, page IX-1, delete the third reference:

~~2010 Highway Capacity Manual, Transportation Research Board, 2010.~~

Section IX, References, page IX-4, change the ninth reference to read:

“California Department of Transportation, Technical Noise Supplement, October 1998; [website:dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/f0008617-traffic-noise-protocol-oct1998-a11y.pdf](http://www.dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/f0008617-traffic-noise-protocol-oct1998-a11y.pdf)”

Section IX, References, page IX-7, delete the second reference:

~~“City of Los Angeles, Board of Public Works, Bureau of Sanitation, “Solid Waste Generation,” 1984.”~~

Section IX, References, page IX-14, add the following reference after “Institute of Transportation Engineers, Ninth Edition of Trip Generation, 2012”:

“Institute of Transportation Engineers, Tenth Edition of Trip Generation, 2017. Weekend traffic generation rates for 676 Mateo Project.”

Section IX, References, page IX-19, revise the fourth reference:

“South Coast Air Quality Management District, CEQA Handbook, pages 6-1 and 6-2.

Section IX, References, page IX-19, add the following reference after “South Coast Air Quality Management District, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, 2008”:

“South Coast Air Quality Management District, White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, website: www.aqmd.gov/nav/about/groups-committees/ciwg”

Section IX, References, page IX-20, delete the fifth reference:

~~Supplemental Traffic Review Memorandum for 850 S Hill Street Project, The Mobility Group, January 2016.~~

Section IX, References, page IX-20, delete the 10th reference:

~~Traffic Study for 8th and Spring Residential, LSA Associates, October, 2014.~~

Section IX, References, page IX-20, delete the 13th, 14th, 15th and 16th references:

~~Traffic Study for the City Market of Los Angeles, The Mobility Group, October 2013.~~

~~Traffic Study for the Metro Emergency Security Operations Center (ESOC), AECOM, August 2015.~~

~~Traffic Study Memorandum of Understanding for 1024 Mateo Street, LLG Engineers, 2017.~~

~~Traffic Study Memorandum of Understanding for 1100 E 5th Street, LLG Engineers, 2017.~~

Section IX, References, page IX-21, remove the sixth reference:

~~“Trip Generation Manual, 10th Edition, Institute of Transportation Engineers, September 2017.”~~

Appendix H Land Use Tables

Appendix H, page 2, change Table IV.G-1 to read:

**Table IV.G-1
Consistency with Applicable Goals of RTP/SCS**

Goal	Project Consistency
<p>Maximize mobility and accessibility for all people and goods in the region. Improve mobility, accessibility, reliability, and travel safety for people and goods.</p>	<p>Consistent. The Project is an infill development within the urbanized Arts District of the downtown area. As with other communities within the City, the Project Site is surrounded by a network of roads and freeways that provide local and regional access. The Project Site is also located in proximity to several public transit opportunities. The availability and accessibility of public transit in the Project area is evidenced by the Project Site's location within a designated High-Quality Transit Area (HQTA).¹ The 2016-2040-2020-2045 RTP / SCS defines HQTAs as generally walkable transit villages or corridors that are 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 Project is located near the intersection of Mateo Street and 7th Street. 7th Street is a major transportation corridor that is served by multiple Metro bus lines. Local and rapid Metro bus lines also run on E. 6th Street, Alameda Street, and Santa Fe Avenue. Given the Project Site's location in proximity to a variety of transportation options and the infill nature of the Project the Project would maximize the potential for mobility and accessibility.</p> <p>The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.</p>
<p>Encourage land use and growth patterns that facilitate transit and active transportation. Increase person and goods movement and travel choices within the transportation system.</p>	<p>Consistent. The Project would encourage land use and growth patterns that facilitate transit by being a compact, infill development near several public transit options, including Metro bus lines. Local and rapid Metro bus lines run on E. 7th Street, E. 6th Street, Alameda Street, and Santa Fe Avenue. In addition, the Project encourages active transportation by including 154 bicycle parking stalls. The Project also improves walkability in the immediate vicinity of the Project Site by replacing a warehouse use and surface</p>

**Table IV.G-1
Consistency with Applicable Goals of RTP/SCS**

Goal	Project Consistency
	<p>parking lot with a mixed-use that activates the street by introducing commercial (restaurant and retail) options.</p> <p>The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project; however, as the flexibility option would increase commercial and reduce residential, a total of 161 bicycle parking stalls would be provided under this option, and, nonetheless would therefore be similarly consistent.</p>
<p><u>Reduce greenhouse gas emissions and improve air quality.</u></p>	<p>Consistent. <u>In addition to adhering to smart growth principles of locating infill development adjacent to existing employment centers and public transportation options, the Project would incorporate a wide range of building technologies, and sustainable design features, including water-conservation features such as high efficiency toilet and urinals, low flow showerheads and private and commercial faucets, draught tolerant and native plants, drip/subsurface, zoned irrigation with weather-based irrigation controllers, water-conserving turf, high-efficiency residential and commercial clothes washers, water-saving pool filters, and leak detection systems for pools and jacuzzis, that would protect the environment by saving energy (which would also reduce air emissions associated with electricity generation), reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. The Project's energy efficiency features and location near major transit facilities, which designates it in a TPA, could help reduce the energy and emission footprint of the Project and the per capita GHG emissions of the residents and visitors from private automobile travel. Therefore, the Project would be consistent with this policy.</u></p> <p><u>The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would, therefore, be similarly consistent.</u></p>
<p><u>Encourage development of diverse housing types in areas that are supported by multiple transportation options.</u></p>	<p>Consistent. <u>The Project would include up to 185 new live/work residences that would be added to</u></p>

**Table IV.G-1
Consistency with Applicable Goals of RTP/SCS**

Goal	Project Consistency
	<p><u>the citywide housing supply. Furthermore, in recognition of the need for affordable housing within the Central City North Community Plan area, the Project would set aside 11 percent of its units, or 20 units total, for deed-restricted for Very Low Income households.</u></p> <p><u>The proposed commercial land uses would provide amenities, jobs, and services to the Project’s future residents, workers, and visitors, as well as the existing community. The Project Site is accessible to the regional and local bus transit systems.</u></p> <p><u>The above analysis is equally applicable to the Flexibility Option, which would include 159 live-work units (with 11 percent of the units deed-restricted for Very Low Income Households), as the overall design, configuration, and operation would be comparable to the Project.</u></p>
<p><i>Source: Southern California Association of Governments, 2016-2040-2020-2045 RTP/SCS, April 2016-September 2020; EcoTierra Consulting, 2020.</i></p>	

Appendix H, page 2, revise footnote 1 as follows:

¹ *SCAG 2016-2040 2020-2045 Regional Transportation Plan / Sustainability Communities Strategy, p. 77-91, Exhibit 5-1 3.8, High Quality Transit Areas in the SCAG Region for 2040 2045, and, p. 189-165, Glossary for HQTA definition.*

Appendix H, page 18, in Table IV.G-4, Project Consistency with Applicable Policies of the Housing Element, change the Project Consistency Analysis for Objective 2.3 to read:

“Consistent. The Project would meet the requirements in the City’s Green Building Code and would include the conservation measures discussed below, in Section (k) Los Angeles Green Building Code. Therefore, the proposed building would minimize the adverse effects on the environment through compliance with energy efficiency requirements, such as reducing indoor and outdoor water demand, installing energy-efficient appliances and equipment, and complying with California Title 24 Building Energy Efficiency Standards, as amended by the City. The proposed building would also minimize the use of non-renewable resources through achieving several objectives of the City of Los Angeles General Plan Framework Element, SCAG’s 2016-2020-2045 RTP/SCS, and SCAQMD AQMP for establishing a regional land use pattern that promotes sustainability. The above analysis is equally applicable to the Flexibility Option as the design, configuration, and operation would be comparable to the Project and would therefore be similarly consistent.”

B. Effect of Corrections and Revisions

CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states:

- (a) *“New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:*
- (1) *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.*
 - (3) *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.*
 - (4) *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”*
- (b) *Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.*

The additions and corrections above reflect updated consistency analysis with the 2020-2045 RTP/SCS, which is similar to the 2016-2040 RTP/SCS, clarification of the earliest start date for project construction, revised haul route, additions to the Project Design Feature for a Construction Staging and Traffic Management Plan that respond to specific requests included in an agency comment letter, revision to a noise mitigation measure, and revisions to references utilized in the EIR. These additions and corrections would not result in new significant impacts or increase the impacts of the Project.

Therefore, the additions and corrections contained in this section and the information contained in **Section II, Responses to Comments**, of this Final EIR, clarify, amplify, or make insignificant changes to the Draft EIR. In addition, **Section II, Responses to Comments**, of this Final EIR, considers and responds to the comments that state that the Project would have significant impacts not disclosed in the Draft EIR and demonstrates that none of these comments provided substantial evidence that the Project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts

than were discussed in the Draft EIR. Rather, the additions and corrections to the Draft EIR address typographical errors, provide minor revisions, and augment the analysis of the Draft EIR and would not result in new significant impacts or an increase in any impact already identified in the Draft EIR. Thus, none of the conditions in CEQA Guidelines Section 15088.5 are met, and recirculation of the Draft EIR is not required.