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

# 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 Sunset Gower Studios Enhancement Plan (the Project). Such changes are a result of 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 the Project creating any new or increased significant environmental impacts.

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

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

Additional 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 <u>underlined text</u>. Such changes are presented by EIR section.

### I. Executive Summary

Volume 1, Section 1, Executive Summary, Table I-1, page I-13, revise Summary of Impacts footnote a as shown below:

> [a] *As discussed in Section IV.B, Air Quality, of this Draft EIR, cumulative impacts from regional emissions during <u>concurrent</u> construction <u>and operation</u> would be significant and unavoidable.*

Volume 1, Section I, Executive Summary, subsection 11.a.(2)(a)(ii) City of Los Angeles Polices, revise first paragraph on page I-19:

In addition, the Project would implement Mitigation Measure AIR-MM-1, which requires the use of off-road diesel equipment that meets USEPA Tier 4 Final off-road emissions standards during peak periods of construction~~, where feasible~~. The Project would also implement Mitigation Measure AIR-MM-2, which requires the use of on-road diesel concrete delivery and export haul trucks to meet CARB's 2010 engine emission standards. The Project also would incorporate project design features to support and promote environmental sustainability. Accordingly, the Project would not conflict with or obstruct implementation of the AQMP, and associated impacts would be less than significant.

Volume 1, Section I, Executive Summary, subsection 11.c.(1)(a) Regional Air Emissions and Air Quality Standards, page I-49, revise text as follows:

As presented in Table IV.B-6 in Section IV.B, Air Quality, of this Draft EIR, regional $NO_X$ emissions would ~~exceed~~ be reduced below the SCAQMD regional threshold during peak periods of construction with implementation of Mitigation Measures AIR-MM-1 and AIR-MM-2. ~~The maximum daily regional $NO_X$ emissions of 261 pounds per day would be anticipated to occur for four days during the overlap of concrete pour days associated with the Subterranean Parking Structure and overlap with building construction of Building A and Parking Structure. Therefore, regional construction emissions resulting~~ However, as presented in Table IV.B-12 on page IV.B-64 regional $NO_X$ emissions during peak-periods of concurrent construction and operations from the Project would result in a significant short-term impact. Mitigation Measures AIR-MM-1 and AIR-MM-2 would reduce this impact. However, impacts would remain significant and unavoidable.

Volume 1, Section I, Executive Summary, subsection 11.c.(1)(b) Contribute to Cumulative Emissions, page I-49, revise first sentence as follows:

As discussed above, the Project would exceed SCAQMD's regional $NO_X$ significance threshold during peak periods of concurrent construction and operations.

Volume 1, Section I, Executive Summary, subsection 11. Project Design Features, beginning on page I-53, revise Project Design Feature NOI-PDF-2 as follows:

**Project Design Feature NOI-PDF-2:** All outdoor mounted mechanical equipment shall be screened from off-site noise-sensitive receptors. The equipment screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per

square feet) and break the line-of-sight from the equipment to the off-site noise-sensitive receptors. Written documentation that the design of the screen complies with this measure shall be submitted at plan check.

Volume 1, Section I, Executive Summary, Subsection 11. Project Design Features, beginning on page I-55, revise Project Design Feature TR-PDF-1 as follows:

**TR-PDF-1:** A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

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

- Prohibition on construction-related vehicles/ equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside commuter peak hours (after 7:00 A.M. or before 3:00 P.M.) to the extent feasible.
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.
- No staging of hauling trucks on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- Securing of loads by trimming and watering or covering to prevent the spilling or blowing of the earth material.
- Cleaning of trucks and loads at the export site to prevent blowing dirt and spilling of loose earth.
- Maintenance of a log documenting the dates of hauling and the number of trips (i.e., trucks) per day available on the job site at all times.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.
- School buses shall have unrestricted access to schools.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.

- Contractors shall install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Contractors shall maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle, bicycle, and/or pedestrian routes to school may be impacted.
- Contractors shall maintain safe and convenient pedestrian routes to all nearby schools.
- Contractors shall install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes shall not pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.
- Construction trucks and other vehicles shall stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.

Volume 1, Section I, Executive Summary, subsection 12, Mitigation Measures, page I-58, revise Mitigation Measure AIR-MM-1 and add Mitigation Measure AIR-MM-2 and Mitigation Measure AIR-MM-2 (Alternative 2) as shown below:

**Mitigation Measure AIR-MM-1:** ~~During plan check,~~ Prior to demolition, the Project representative shall make available to the lead agency or City of Los Angeles

Department of Building and Safety and the South Coast Air Quality Management District a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that with the exception of demolition activities will be used during any portion of construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment within the construction inventory list described above shall meet the EPA Tier 4 Final standards ~~where feasible~~.

**Mitigation Measure AIR-MM-2:** The Project representative shall require operator(s)/construction contractor(s) to commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of $NO_X$ emissions or newer, cleaner trucks for: (1) haul trucks associated with grading of Building A, Parking Structure, and Subterranean Parking Structure; and (2) concrete delivery trucks during concrete mat foundation pours for Building A, Parking Structure, and Subterranean Parking Structure. To monitor and ensure 2010 model year or newer trucks are used at the Proposed Project, the Lead Agency shall require that truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities associated with the Proposed Project and make these records available to the Lead Agency upon request. The records shall be submitted to the City of Los Angeles Department of City Planning at Project plan check and will be available onsite.

In the event that Alternative 2 is adopted, the phasing is slightly different and the mitigation shall be modified as follows:

**Mitigation Measure AIR-MM-2 (Alternative 2):** The Project representative shall require operator(s)/construction contractor(s) to commit to using 2010 model year or newer engines that

meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of $NO_X$ emissions or newer, cleaner trucks for: (1) haul trucks associated with grading activities; and (2) concrete delivery trucks during concrete mat foundation pours. To monitor and ensure 2010 model year or newer trucks are used at the Proposed Project, the Lead Agency shall require that truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities associated with the Proposed Project and make these records available to the Lead Agency upon request. The records shall be submitted to the City of Los Angeles Department of City Planning at Project plan check and will be available onsite.

Volume 1, Section I, Executive Summary, subsection 12, Mitigation Measures, page I-61, revise Mitigation Measure PAL-MM-1 as shown below:

**PAL-MM-1:** ~~A~~ Prior to demolition, a qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

Volume 1, Section I, Executive Summary, subsection 12, Mitigation Measures, page I-61, revise Mitigation Measure NOI-MM-1 as shown below:

**Mitigation Measure NOI-MM-1:** A temporary and impermeable sound barrier shall be erected, during Phase 1 and

Phase 2 construction, at the locations listed below. ~~At plan check,~~ Prior to demolition, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the eastern property line of the Project Site between the construction areas and the residential uses on the east side of Gordon Street east of the Project Site (receptor R1). The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor R1.
- Along the southern property line of the Project Site between the construction areas and residential use on Fountain Avenue south of the Project Site (receptor R2). The temporary sound barrier shall be designed to provide a minimum 12-dBA noise reduction at the ground level of receptor R2.

Volume 1, Section I, Executive Summary, subsection 12, Mitigation Measures, pages I-61 and I-62, revise Mitigation Measure NOI-MM-2 as shown below:

**Mitigation Measure NOI-MM-2:** Prior to start of ~~construction~~, demolition, the Applicant shall retain the services of a structural engineer or qualified professional to visit the on-site historic buildings adjacent to the Project construction areas to inspect and document the apparent physical condition of the buildings' readily-visible features.

- The Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at on-site historic buildings located within 20 feet of the Project construction activities, during demolition and grading/excavation phases. The vibration monitoring system shall continuously measure and store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.10 PPV and a regulatory level of 0.12 PPV. The system shall also provide real-time alert when the vibration levels exceed the two preset levels.

- The vibration monitoring program shall be submitted to the Department of Building and Safety (DBS) for review and approval, prior to start of construction activities.
- In the event the warning level (0.10 PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.
- In the event the regulatory level (0.12 PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart.
- The recorded vibration levels and inspection logs shall be submitted to DBS for verification.

# II. Project Description

Volume 1, Section II, Project Description, subsection 5.f. Anticipated Construction Schedule, page II-17, revise haul route text as follows:

The timing of construction of specific elements of the Project would depend on the business needs at the time. Project construction could occur in phases, with construction potentially commencing in or before 2024 and buildout completed in 2028. Construction activities would include demolition of existing uses, grading and excavation, and construction of new structures and related infrastructure. Construction of Building A and Parking Structure would require approximately 39 months, construction of the subterranean parking structure would require approximately 15 months, and construction of Buildings B and C would require approximately 18 months. Approximately 280,000 cubic yards of soil would be hauled from the Project Site during the excavation phase. ~~The haul route from the Project Site is anticipated to be via Sunset Boulevard to the Hollywood Freeway (US-101) to the east.~~ Haul trucks traveling to the Project Site would arrive via Van Ness Avenue from the Hollywood Freeway (US-101), then turn right traveling west on Sunset Boulevard, then turn left traveling south on Gordon Street and then turn right into the Project Site. Haul trucks leaving the Project Site would turn right onto Fountain Avenue or right onto Gordon Street and then right onto Fountain

Avenue, then turn right traveling north on Gower Street, then turn right heading west on Hollywood Boulevard, and then turn left to travel Northbound on the US-101.

# IV.A. Aesthetics, Views, Light/Glare, and Shading

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

# IV.B. Air Quality

Volume 1, Section IV.B, Air Quality, subsection 3.d.(1)(a)(i) Threshold (b) Regional Emissions, page IV.B-50, revise conclusion as follows:

**Therefore, regional construction emissions resulting from the Project would result in a significant short-term impact. Further, as discussed below, mitigation measures would ~~not~~ reduce impacts to a less than significant level. Therefore, impacts would ~~remain significant and unavoidable~~ be less than significant after implementation of feasible mitigation.**

Volume 1, Section IV.B, Air Quality, subsection 3.d.(1)(d)(2) Threshold (b) Mitigation Measures, page IV.B-60, revise Mitigation Measure AIR-MM-1 and add Mitigation Measure AIR-MM-2 and Mitigation Measure AIR-MM-2 (Alternative 2) as shown below:

**Mitigation Measure AIR-MM-1:** Prior to demolition, ~~During plan check,~~ the Project representative shall make available to the lead agency or City of Los Angeles Department of Building and Safety and the South Coast Air Quality Management District a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that with the exception of demolition activities will be used during any portion of construction. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment within the

construction inventory list described above shall meet the EPA Tier 4 Final standards ~~where feasible~~.

**Mitigation Measure AIR-MM-2:** The Project representative shall require operator(s)/construction contractor(s) to commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of $NO_X$ emissions or newer, cleaner trucks for: (1) haul trucks associated with grading of Building A, Parking Structure, and Subterranean Parking Structure; and (2) concrete delivery trucks during concrete mat foundation pours for Building A, Parking Structure, and Subterranean Parking Structure. To monitor and ensure 2010 model year or newer trucks are used at the Proposed Project, the Lead Agency shall require that truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities associated with the Proposed Project and make these records available to the Lead Agency upon request. The records shall be submitted to the City of Los Angeles Department of City Planning at Project plan check and will be available onsite.

In the event that Alternative 2 is adopted, the phasing is slightly different and the mitigation shall be modified as follows:

**Mitigation Measure AIR-MM-2 (Alternative 2):** The Project representative shall require operator(s)/construction contractor(s) to commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of $NO_X$ emissions or newer, cleaner trucks for: (1) haul trucks associated with grading activities; and (2) concrete delivery trucks during concrete mat foundation pours. To monitor and ensure 2010 model year or newer trucks are used at the Proposed Project, the Lead Agency shall require that truck operator(s)/construction contractor(s) maintain records of trucks during the applicable construction activities associated with the Proposed Project and make these records available to the Lead Agency upon request. The records shall be submitted to the City of Los Angeles Department of City Planning at Project plan check and will be available onsite.

Volume 1, Section IV.B, Air Quality, subsection 3.d.(3)(a) Threshold (b) Construction, page IV.B-62, revise first paragraph as shown below:

> Implementation of the mitigation measures described above would reduce construction emissions for all pollutants. Table IV.B-11 on page IV.B-62 provides the peak daily mitigated regional emissions by construction phase and includes overlapping phases (e.g., Overlap of Grading of Subterreanen Parking Structure and Building Construction of Bldg A & Parking Structure) ~~(approximately 139 days over the five year construction duration). The maximum daily regional $NO_x$ emissions of 261 pounds per day would be reduced to 204 pounds per day or a decrease of 22 percent and would be anticipated to occur for four days during the overlap of concrete pour days associated with the Subterranean Parking Structure and overlap with building construction of Building A and Parking Structure~~. **As such, Project construction would result in <u>less than</u> significant ~~and unavoidable~~ Project-level and cumulative regional impacts ~~even~~ with incorporation of all feasible mitigation measures.**

Volume 1, Section IV.B, Air Quality, page IV.B-53, replace Table IV.B-11 on with <u>Revised</u> Table IV.B-11 on page III-13:

**Revised Table IV.B-11**
**Estimate of Mitigated Maximum Regional Project Daily Construction Emissions (pounds per day)[a]**

| Construction Phasing and Duration | | Pollutant Emissions (pounds per day) | | | | | |
|---|---|---|---|---|---|---|---|
| **Phase (Activity)** | **Active Days** | **VOC[b]** | **$NO_X$** | **CO** | **$SO_X$** | **$PM_{10}$[c]** | **$PM_{2.5}$[c]** |
| Demolition (Total) | 83 | 4 | 55 | 37 | <1 | 5 | 2 |
| Grading (Bldg. A & Parking Structure) | 65 | 4 | ~~102~~ 52 | ~~57~~ 38 | <1 | 8 | 3 |
| Mat Foundation (Bldg. A & Parking Structure)[d] | 10 | 5 | ~~140~~ 55 | ~~89~~ 67 | <1 | 7 | 2 |
| Overlap of Grading (Subterranean Parking Structure) and Building Construction (Bldg. A & Parking Structure) | 54 | 7 | ~~115~~ 65 | ~~99~~ 81 | <1 | 15 | 4 |
| Overlap of Mat Foundation (Subterranean Parking Structure) and Building Construction (Bldg. A & Parking Structure)[e] | 10 | 17 | ~~204~~ 87 | ~~143~~ 117 | 1 | 16 | 5 |
| Overlap of Building Construction (Subterranean Parking Structure and Bldg. A & Parking Structure) | 260 | 6 | 26 | 81 | <1 | 13 | 4 |
| Building Construction (Bldg. A & Parking Structure) | 364 | 3 | 13 | 43 | <1 | 7 | 2 |
| Overlap of Grading (Bldgs. B & C); (Building Construction (Bldg. A & Parking Structure); and Architectural Coatings | 7 | 19 | ~~75~~ 81 | 98 | <1 | 14 | 4 |
| Overlap of Mat Foundation (Bldgs. B & C) and Architectural Coatings[f] | 10 | 16 | 73 | 86 | <1 | 8 | 2 |
| Overlap of Building Construction (Bldgs. B & C) and Architectural Coatings | 392 | 15 | 13 | 42 | <1 | 12 | 3 |
| **Maximum Unmitigated Construction Emissions** | | **19** | **~~204~~ 87** | **~~143~~ 117** | **1** | **16** | **5** |
| **SCAQMD Daily Significance Thresholds** | | **75** | **100** | **550** | **150** | **150** | **55** |
| **Over/(Under)** | | **(56)** | **~~104~~ (13)** | **~~(407)~~ (433)** | **(150)** | **(134)** | **(50)** |
| **Maximum Unmitigated Construction Emissions Exceed Threshold?** | | **No** | **~~Yes~~ No** | **No** | **No** | **No** | **No** |

*Numbers may not add up exactly due to rounding.*

*[a] The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR. Pollutant emissions reflect full implementation of Mitigation Measure AIR-MM-1.*

*[b] Please note that the SCAQMD significance threshold is in terms of VOC while CalEEMod calculates reactive organic compounds (ROG) emissions. For purposes of this analysis, VOC and ROG are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.*

*[c] Unmitigated scenario assumes compliance with SCAQMD Rule 403 requirements for fugitive dust.*

*[d] Reflects pollutant emissions that would occur on a total of six days during pouring of Building A and Parking Structure F's mat foundation during the ten day period.*

*[d] Reflects pollutant emissions that would occur on a total of four days during pouring of Below Grade Parking Structure's mat foundation during the ten day period.*

*[f] Reflects pollutant emissions that would occur on a total of three days during pouring of Building C and Building D's mat foundation during the ten day period.*

*Source: Eyestone Environmental, 2020.*

Volume 1, Section IV.B, Air Quality, subsection 3. e.(1)(a) Construction, page IV.B-66, revise text as follows:

> As discussed in Section IV.B.3.c(2) under Thresholds (b) and (c) above, the Project's construction-related regional air quality emissions, localized emissions, and emissions of TACs would be less than significant ~~except for an exceedance of the SCAQMD's regional $NO_x$ significance threshold during peak periods of construction (approximately 156 days over the five year construction duration). The maximum daily regional $NO_x$ emissions of 261 pounds per day would be anticipated to occur for four days during the overlap of concrete pour days associated with the Subterranean Parking Structure and overlap with building construction of Building A and Parking Structure~~. Based on SCAQMD guidance, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment.[63] Therefore, the Project's contribution to cumulative air quality impacts due to regional $NO_X$ emissions would <u>not</u> be cumulatively considerable.

Volume 1, Section IV.B, Air Quality, subsection 3.e.(2) Mitigation Measures, page IV.B-67, revise text as shown below:

> Cumulative impacts related to air quality would be cumulatively considerable during construction activities. Mitigation Measure<u>s</u> AIR-MM-1 ~~has~~ <u>and AIR-MM-2 have</u> been implemented to reduce construction NOx emissions to the furthest extent possible.

Volume 1, Section IV.B, Air Quality, subsection 3.e.(3) Level of Significance After Mitigation, page IV.B-68, revise text as follows:

> ~~Even with~~ <u>With</u> implementation of Mitigation Measure<u>s</u> AIR-MM-1 <u>and AIR-MM-2</u>, Project construction would result in <u>less than</u> significant ~~and unavoidable~~ Project-level and cumulative regional impacts. Project-level and cumulative operational impacts with regard to regional and localized air quality would be less than significant. <u>However, concurrent construction and operational emissions would result in significant and unavoidable Project-level and cumulative regional impacts.</u>

Volume 1, Section, IV.B, Air Quality, subsection 3.f, Quantitative Analysis Connecting the Project's Significant Regional Pollutant Emissions and Human Health Is Not Feasible, page IV.b-69, revise first sentence in the first paragraph as shown below:

In the case of the Project, regional concurrent construction and operational emissions exceed the SCAQMD's recommended daily significance thresholds for $NO_X$.

Volume 1, Section IV.B, Air Quality, subsection 3.f, Quantitative Analysis Connecting the Project's Significant Regional Pollutant Emissions and Human Health Is Not Feasible, page IV.b-69, revise first sentence in the last paragraph as follows:

Based on information provided in the City's guidance document, the Project would fall within the scope of a "typical City project," since peak daily concurrent construction and operational regional $NO_X$ emissions of ~~104~~ 28 pounds per day over the SCAQMD's signficance threshold represent approximately ~~1.6~~ 0.4 percent of the emissions analyzed by SCAQMD related to Rule 1315, respectively.

## IV.C. Cultural Resources

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

## IV.D. Energy

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

## IV.E. Paleontological Resources

Volume 1, Section IV.E, Paleontological Resources, subsection 3.d.(2) Threshold (a) Mitigation Measures, pages IV.E-4 and IV.E-5, revise Mitigation Measure PAL-MM-1 as shown below:

**PAL-MM-1:** ~~A~~ Prior to demolition, a qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the

evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

## IV.F. Greenhouse Gas Emissions

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

## IV.G. Land Use and Planning

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

## IV.H. Noise

Volume 2, Section IV.H, Noise, subsection 3.c. Project Design Features, page IV.H-25, revise Project Design Feature NOI-PDF-2 as shown below:

**Project Design Feature NOI-PDF-2:** All outdoor mounted mechanical equipment shall be screened from off-site noise-sensitive receptors. The equipment screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment to the off-site noise-sensitive receptors. Written documentation that the design of the screen complies with this measure shall be submitted at plan check.

Volume 2, Section IV.H, Noise, page IV.H-31, revise the second full paragraph as follows:

Table IV.H-13 on page IV.H-32 provides the estimated number of construction-related trips, including haul/delivery trucks and worker vehicles, and the estimated noise levels along the anticipated haul route(s) for the various construction phases. As indicated in Table IV.H-13, the noise levels generated by construction trucks during all stages of Project construction would be below the existing daytime ambient noise levels along Sunset Boulevard, Fountain Avenue, Van Ness Avenue, Hollywood Boulevard, and Gower Street. However, the estimated noise from project construction trucks would exceed the 5-dBA significance criteria for noise sensitive receptor

(receptor location R1) along Gordon Street by up to ~~7.3~~ 3.4 dBA during the grading, mat foundation, and building construction phases.

Volume 2, Section IV.H, Noise, page IV.H-31, revise the second full paragraph as follows:

As described above, there is a potential for overlapping construction of Phase 1 and Phase 2. Therefore, the off-site construction-related traffic noise impacts associated with the overlapping construction activities are provided in Table IV.H-14 on page IV.H-34. As indicated in Table IV.H-14, the construction-related traffic with overlapping construction activities would be below the significance threshold along Sunset Boulevard, Van Ness Avenue, Hollywood Boulevard, and Gower Street; however, the significance threshold would be exceeded by up to 0.1 dBA along Fountain Avenue and up to ~~7.9~~ 4.2 dBA along Gordon Street. **Therefore, temporary noise impacts from off-site construction traffic would be significant, and mitigation measures are required.**

Volume 2, Section IV.H, Noise, page IV.H-32, replace Table IV.H-13 with Revised Table IV.H-13 on page III-18:

**Revised Table IV.H-13**
**Off-Site Construction Haul Truck Noise Levels**

| Construction Phase | Estimated Number of Construction Truck/ Worker Trips per Day | Estimated Number of Construction Truck/ Worker Trips per Hour[a] | Estimated Haul Truck Noise Levels Along the Project Haul Routes ($L_{eq}$ (dBA)) (Project/Project + Ambient) | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Sunset Boulevard | Gordon Street | Fountain Avenue | Gower Street (South of Sunset) | Gower Street (North of Sunset) | Van Ness Avenue | Hollywood Boulevard |
| Demolition | 80/60 | 10/24 | ~~62.3/73.6~~ 61.1/73.6 | ~~63.7/65.6~~ 59.7/63.5 | 59.7/67.1 | 59.1/67.0 | 61.1/69.7 | 61.1/68.9 | 61.1/72.0 |
| Grading—All Phases | 314/60 | 40/24 | ~~68.0/74.4~~ 66.5/74.1 | ~~69.4/70.0~~ 65.1/66.6 | 65.1/68.7 | 64.5/68.4 | 66.5/71.0 | 66.5/70.4 | 66.5/72.8 |
| Foundation—Phase 2A | 832/60 | 70/24 | ~~70.4/75.1~~ 68.8/74.6 | ~~71.8/72.2~~ 67.4/68.3 | 67.4/69.9 | 66.8/69.5 | 68.8/72.0 | 68.8/71.5 | 68.8/73.4 |
| Foundation—Phase 2B | 1,148/60 | 96/24 | ~~71.7/75.6~~ 70.2/75.0 | ~~73.1/73.4~~ 68.8/69.5 | 68.8/70.7 | 68.1/70.3 | 70.2/72.7 | 70.2/72.3 | 70.2/74.0 |
| Foundation—Phase 3 | 918/60 | 77/24 | ~~70.8/75.2~~ 69.3/74.8 | ~~72.2/72.5~~ 67.9/68.7 | 67.9/70.1 | 67.2/69.7 | 69.3/72.2 | 69.3/71.8 | 69.3/73.6 |
| Building Construction—All Phases | 60/400 | 8/160 | ~~63.6/73.7~~ 63.7/73.8 | ~~65.0/66.5~~ 62.3/64.8 | 62.3/67.7 | 61.7/67.5 | 63.7/70.2 | 63.7/69.4 | 63.7/72.3 |
| Existing Ambient Noise Levels Along the Project Haul Routes, $L_{eq}$ (dBA)[b] | | | 73.3 | 61.1 | 66.2 | 66.2 | 69.1 | 68.1 | 71.6 |
| Significance Criteria, $L_{eq}$ (dBA)[c] | | | 78.3 | 66.1 | 71.2 | 71.2 | 74.1 | 73.1 | 76.6 |
| Maximum Noise Exceedance Above the Criteria, $L_{eq}$ (dBA)[d] | | | 0.0 | ~~7.3~~3.4 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Significant Impact? | | | **No** | **Yes** | **No** | **No** | **No** | **No** | **No** |

[a] *For construction trucks, the number of hourly trips is based on an hourly average, assuming a uniform distribution of trips over an 8-hour work day for the demolition, grading and building construction phases and over a 12-hour work day for the mat foundation phase. For modelling, the hourly truck trips are divided by two, as incoming and leaving trucks would be on different roadways. For worker vehicles, the number of hourly trips is based on 40 percent of the worker trips that would arrive in one hour to represent a conservative analysis.*

[b] *Ambient noise levels along the haul routes are based on measurements at nearby receptor locations (i.e., receptor R1 along Gordon Street, receptor R2 along Fountain Avenue, R3 along Gower Street, and R4 along Sunset Boulevard). Ambient noise levels along Gower Street (north of Sunset Boulevard) and Hollywood Boulevard are based on measured ambient noise levels for the Hollywood Gower Project EIR (City of Los Angeles, September 2018). Ambient noise level along Van Ness is based on measured ambient on 7/1/2020.*

**Revised Table IV.H-13 (Continued)**
**Off-Site Construction Haul Truck Noise Levels**

| Construction Phase | Estimated Number of Construction Truck/ Worker Trips per Day | Estimated Number of Construction Truck/ Worker Trips per Hour[a] | Estimated Haul Truck Noise Levels Along the Project Haul Routes ($L_{eq}$ (dBA)) (Project/Project + Ambient) | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Sunset Boulevard | Gordon Street | Fountain Avenue | Gower Street (South of Sunset) | Gower Street (North of Sunset) | Van Ness Avenue | Hollywood Boulevard |

[c] *Significance criteria are equivalent to the measured daytime ambient noise levels plus 5 dBA.*

[d] *Exceedance = Project plus Ambient − Significance Criteria.*

*Source: AES, 2020.*

Volume 2, Section IV.H, Noise, page IV.H-33, replace Table IV.H-14 with Revised Table IV.H-14 on page III-21:

**Revised Table IV.H-14**
**Off-Site Construction Haul Truck Noise Levels—Overlapping Construction**

| Overlapping Construction | Estimated Number of Construction Truck/ Worker Trips per Day | Estimated Number of Construction Truck/ Worker Trips per Hour[a] | Estimated Haul Truck Noise Levels Along the Project Haul Routes ($L_{eq}$ (dBA)) (Project/Project + Ambient) | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | Sunset Boulevard | Gordon Street | Fountain Avenue | Gower Street (South of Sunset) | Gower Street (North of Sunset) | Van Ness Avenue | Hollywood Boulevard |
| Phase 1 Building Construction and Phase 2 Grading | 374/460 | 48/184 | ~~69.4/74.8~~ 68.3/74.5 | ~~70.8/71.2~~ 66.9/67.9 | 66.9/69.6 | 66.3/69.3 | 68.3/71.7 | 68.3/71.2 | 68.3/73.3 |
| Phase 1 Building Construction and Phase 2 Foundation | 1,208/460 | 104/184 | ~~72.4/75.9~~ 71.1/75.3 | ~~73.8/74.0~~ 69.7/70.3 | 69.7/71.3 | 69.0/70.8 | 71.1/73.2 | 71.1/72.9 | 71.1/74.4 |
| Phase 1 Building Construction and Phase 2 Building Construction | 120/800 | 16/320 | ~~66.7/74.2~~ 66.7/74.2 | ~~68.0/68.8~~ 65.3/66.7 | 65.3/68.8 | 64.7/68.5 | 66.7/71.1 | 66.7/70.5 | 66.7/72.8 |
| Existing Ambient Noise Levels Along the Project Haul Routes, $L_{eq}$ (dBA)[b] | | | 73.3 | 61.1 | 66.2 | 66.2 | 69.1 | 68.1 | 71.6 |
| Significance Criteria, $L_{eq}$ (dBA)[c] | | | 78.3 | 66.1 | 71.2 | 71.2 | 74.1 | 73.1 | 76.6 |
| Maximum Noise Exceedance Above the Criteria, $L_{eq}$ (dBA)[d] | | | 0.0 | ~~7.9~~ 4.2 | 0.1 | 0.0 | 0.0 | 0.0 | 0.0 |
| Significant Impact? | | | **No** | **Yes** | **Yes** | **No** | **No** | **No** | **No** |

[a] *For construction trucks, the number of hourly trips is based on an hourly average, assuming a uniform distribution of trips over an 8-hour work day for the demolition, grading and building construction phases and over a 12-hour work day for the mat foundation phase. For modelling, the hourly truck trips are divided by two, as incoming and leaving trucks would be on different roadways. For worker vehicles, the number of hourly trips is based on 40 percent of the worker trips that would arrive in one hour to represent a conservative analysis.*

[b] *Ambient noise levels along the haul routes are based on measurements at nearby receptor locations (i.e., receptor R1 along Gordon Street, receptor R2 along Fountain Avenue, R3 along Gower Street, and R4 along Sunset Boulevard). Ambient along Gower Street (north of Sunset Boulevard) and Hollywood Boulevard are based on measured ambient noise levels for the Hollywood Gower Project EIR (City of Los Angeles, September 2018). Ambient along Van Ness is based on measured ambient on 7/1/2020.*

[c] *Significance criteria are equivalent to the measured daytime ambient noise levels plus 5 dBA.*

[d] *Exceedance = Project plus Ambient − Significance Criteria.*

*Source: AES, 2020.*

Volume 2, Section IV.H, Noise, page IV.H-34, revise the second full paragraph as follows:

> With respect to off-site noise (i.e. construction and operation traffic), the dominate noise would be due to construction truck traffic. The estimated peak period would be during the Phase 3 foundation phase. As indicated in Table IV.H-13, the estimated noise level from off-site construction traffic along Gordon Street, Fountain Avenue, and Gower Street would be ~~72.2~~ 67.9 dBA, 67.9 dBA and 67.2 dBA, respectively. The estimated noise level from the interim Project traffic, including operation of Building A, Parking Structure, Subterranean Parking Structure (2024), and existing on-site operation along Gordon Street, Fountain Avenue, and Gower Street would be 67.7 dBA, 71.1 dBA, and 70.5 dBA, respectively. Thus, the estimated composite off-site traffic (including Project construction, interim Project traffic, and existing ambient) noise level along Gordon Street, Fountain Avenue, and Gower Street, during concurrent Project construction and operation would be approximately ~~73.8~~ 71.3 dBA, 73.7 dBA, and 73.1 dBA, which would exceed the 66.1 dBA significance threshold along Gordon Street and the 71.2 dBA significance threshold along Fountain Avenue and Gower Street. **Therefore, temporary noise impacts from concurrent off-site construction and operation traffic would be significant, and mitigation measures are required.**

Volume 2, Section IV.H, Noise, subsection 3.d.(2)(a) Threshold (a) Mitigation Measures, page IV.H-48, revise Mitigation Measure NOI-MM-1 as shown below:

> **Mitigation Measure NOI-MM-1:** A temporary and impermeable sound barrier shall be erected, during Phase 1 and Phase 2 construction, at the locations listed below. ~~At plan check,~~ Prior to demolition, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.
>
> - Along the eastern property line of the Project Site between the construction areas and the residential uses on the east side of Gordon Street east of the Project Site (receptor R1). The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor R1.
> - Along the southern property line of the Project Site between the construction areas and residential use on Fountain Avenue south of the Project Site

(receptor R2). The temporary sound barrier shall be designed to provide a minimum 12-dBA noise reduction at the ground level of receptor R2.

Volume 2, Section IV.H, Noise, page IV.H-52, revise the last full paragraph as follows:

As described above, construction delivery/haul trucks would travel between the Project Site and US-101 via Sunset Boulevard, Gordon Street, Fountain Avenue, Van Ness Avenue, Hollywood Boulevard, and Gower Street. Heavy-duty construction trucks would generate ground-borne vibration as they travel along the Project's anticipated haul route(s). Thus, an analysis of potential vibration impacts using the building damage and human annoyance criteria for ground-borne vibration along the anticipated local haul routes was conducted.

Volume 2, Section IV.H, Noise, page IV.H-53, revise the last full paragraph as follows:

As indicated in the noise calculation worksheets included in Appendix G to this Draft EIR, the temporary vibration levels could reach approximately ~~0~~ 71 VdB periodically as trucks pass sensitive receptors along the anticipated haul route(s), including; Sunset Boulevard, Gordon Street, Fountain Avenue, Hollywood Boulevard, Van Ness Avenue, and Gower Street. Therefore, the residential and hotel uses along Sunset Boulevard, Gordon Street, Fountain Avenue, Van Ness Avenue, Hollywood Boulevard, and Gower Street (between the Project Site and US-101) would be exposed to ground-borne vibration up to ~~0~~ 71 VdB, which would be below the 72-VdB significance criteria from the construction trucks. In addition, the estimated vibration level of ~~0~~ 71 VdB would be below the 75-VdB significance criteria applicable to school use.

Volume 1, Section IV.H, Noise, subsection 3.d.(2)(a) Threshold (b) Mitigation Measures, pages IV.H-54 and IV.H-55, revise Mitigation Measure NOI-MM-2 as shown below:

**Mitigation Measure NOI-MM-2:** Prior to start of ~~construction,~~ demolition, the Applicant shall retain the services of a structural engineer or qualified professional to visit the on-site historic buildings adjacent to the Project construction areas to inspect and document the apparent

physical condition of the buildings' readily-visible features.

- The Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at on-site historic buildings located within 20 feet of the Project construction activities, during demolition and grading/excavation phases. The vibration monitoring system shall continuously measure and store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of 0.10 PPV and a regulatory level of 0.12 PPV. The system shall also provide real-time alert when the vibration levels exceed the two preset levels.
- The vibration monitoring program shall be submitted to the Department of Building and Safety (DBS) for review and approval, prior to start of construction activities.
- In the event the warning level (0.10 PPV) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.
- In the event the regulatory level (0.12 PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart.
- The recorded vibration levels and inspection logs shall be submitted to DBS for verification.

Volume 2, Section IV.H, Noise, page IV.H-56, revise the first and second full paragraphs as follows:

Vibration levels generated by construction trucks (i.e., haul, delivery, and concrete trucks) along the Project's haul route (i.e., Sunset Boulevard,

Gordon Street, Fountain Avenue, Van Ness Avenue, Hollywood Boulevard, and Gower Street) would be below the significance criteria for building damage. Therefore, vibration impacts with respect to building damage would be less than significant.

Project-related vibration levels from construction trucks would not exceed the significance criteria for human annoyance at sensitive receptors (e.g., residential and hotel uses) along Sunset Boulevard, Gordon Street, Fountain Avenue, Van Ness Avenue, Hollywood Boulevard, and Gower Street. Therefore, Project-level vibration impacts from off-site construction with respect to human annoyance would also be less than significant.

Volume 2, Section IV.H, Noise, page IV.H-59, revise the first full paragraph as follows:

Off-site construction haul trucks would have a potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul route. The haul truck routes for the related projects would be approved by LADOT and/or the Department of Building and Safety according to the location of the individual construction site and the ultimate destination. The City's established review process would take into consideration overlapping construction projects and would balance haul routes to minimize the impacts of cumulative hauling on any particular roadway. Based on the existing daytime ambient noise level of 66.5 dBA ($L_{eq}$) along Gower Street and 73.3 dBA ($L_{eq}$) along Sunset Boulevard (refer to Table IV.H-13 on page IV.H-32), it is estimated that up to 66 truck trips along Gower Street and 293 truck trips per hour along Sunset Boulevard would increase the ambient noise levels by 5 dBA and exceed the significance criteria.[35] Since the Project would generate up to ~~104~~ 52 truck trips per hour along Sunset Boulevard and 52 truck trips along Gower Street during peak construction period, it is conservatively assumed that truck traffic related to construction of the Project and other related projects would cumulatively add up to 293 or more hourly truck trips along Sunset Boulevard and up to 66 or more hourly truck trips along Gower Street. Using the haul route specified by LADOT, the Project would also generate up to 52 haul trips per hour along Hollywood Boulevard and 52 haul trips per hour along Van Ness Avenue. Based on the existing ambient noise levels along these segments, cumulative noise impacts could also occur with the addition of 143 trucks per hour along Hollywood Boulevard and 64 trucks per hour along Van Ness Avenue. In addition, as analyzed above, the Project off-site construction trucks during the grading and mat foundation phase would exceed the significance threshold along Gordon Street and Fountain Avenue. Therefore, any additional trucks

from the related projects that would travel along Gordon Street and Fountain Avenue, would increase the noise and would contribute to the cumulative impact. Therefore, cumulative noise due to construction truck traffic from the Project and other related projects has the potential to exceed the ambient noise levels along the haul route by 5 dBA.[35a] **As such, cumulative noise impacts from off-site construction would be significant.**

[35] *It is estimated that with 66 truck trips, the noise level along Gower Street would be 69.5 dBA, when added to the existing ambient of 66.2 dBA the cumulative noise levels would be 71.2 dBA, which would increase the ambient by 5.0 dBA. Similarly, it is estimated that with 293 truck trips, the noise level along Sunset Boulevard would be 76.6 dBA, and when added to the existing ambient of 73.3 dBA the cumulative noise level would be 78.3 dBA, which would increase the ambient by 5.0 dBA.*

[35a] *Note that this analysis is conservative as the truck trips include the short-term concrete trips from the mat pour (few days) in addition to haul truck trips. In addition, the existing noise levels along the segment of Van Ness Avenue from the US-101 Freeway are based on a noise measurement conducted in July 2020 when traffic noise was substantially less due to the decrease in vehicle traffic associated with the COVID pandemic. When traffic resumes to typical conditions, the number of trucks that would trigger an impact at this segment would increase as the existing ambient noise level would increase.*

Volume 2, Section IV.H, Noise, page IV.H-64, revise the first partial paragraph as follows:

existing buildings that are approximately 20 feet from the right-of-way of the anticipated haul route(s) for the Project (i.e., Sunset Boulevard, Gordon Street, Fountain Avenue, Hollywood Boulevard, Van Ness Avenue, and Gower Street). These buildings are anticipated to be exposed to ground-borne vibration levels of approximately 0.022 PPV. Trucks from the related projects are expected to generate similar ground-borne vibration levels. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul route(s) would be below the most stringent building damage significance criteria of 0.12 PPV for buildings extremely susceptible to vibration. **Therefore, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant.**

As discussed above, potential vibration impacts associated with temporary and intermittent vibration from project-related construction trucks traveling along the anticipated haul route(s) would less than significant with respect to human annoyance. As related projects would be anticipated to use similar trucks as the Project, it is anticipated that construction trucks would generate similar vibration levels along the anticipated haul route(s). However, vibration impacts are evaluated based on the peak vibration levels

generated by individual trucks. **Therefore, to the extent that other related projects use the same haul route (i.e., Sunset Boulevard, Gordon Street, Fountain Avenue, Hollywood Boulevard, Van Ness Avenue, and Gower Street) as the Project, potential cumulative human annoyance impacts associated with temporary and intermittent vibration from haul trucks traveling along the designated haul routes would be less than significant.**

## IV.I.1 Public Services—Fire Protection

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

## IV.I.2 Public Services—Police Protection

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

## IV.J. Transportation

Volume 2, Section IV.J, Transportation, subsection 3.c. Project Design Features, pages IV.J-24 through IV.J-26, revise Project Design Feature TR-PDF-1 as follows:

**TR-PDF-1:** A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Sunset Boulevard and Gordon Street, to ensure traffic

safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways.

- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Schedule of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Prohibition on construction-related vehicles/ equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside commuter peak hours (after 7:00 A.M. or before 3:00 P.M.) to the extent feasible.
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.
- No staging of hauling trucks on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- Securing of loads by trimming and watering or covering to prevent the spilling or blowing of the earth material.
- Cleaning of trucks and loads at the export site to prevent blowing dirt and spilling of loose earth.
- Maintenance of a log documenting the dates of hauling and the number of trips (i.e., trucks) per day available on the job site at all times.

- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.
- School buses shall have unrestricted access to schools.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors shall install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Contractors shall maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle, bicycle, and/or pedestrian routes to school may be impacted.
- Contractors shall maintain safe and convenient pedestrian routes to all nearby schools.
- Contractors shall install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes shall not pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

- Construction trucks and other vehicles shall stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.

## IV.K. Tribal Cultural Resources

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

## IV.L.1 Utilities and Service Systems—Water Supply and Infrastructure

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

## IV.L.2 Utilities and Service Systems—Wastewater

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

## IV.L.3 Utilities and Service Systems—Energy Infrastructure

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

## V. Alternatives

Volume 2, Section V, Alternatives, beginning on page V-29, revise text as follows:

Alternative 2 would construct less total floor area as well as retain more buildings than the Project, which would result in fewer demolition activities and less overall building construction. In addition, Alternative 2 would include additional excavation and export associated with the additional level of subterranean parking compared to the Project. The additional excavation and export would increase the duration of these activities, but not the intensity of daily construction activity (i.e., the number of daily haul trips and equipment required for excavation would not change). Taking into consideration the additional excavation and less overall building construction, the total construction duration would be reduced under Alternative 2. The construction phasing under Alternative 2 would also occur differently compared to the Project such that the overlap between different construction activities could occur. As detailed in Appendix B of this Draft EIR, maximum daily construction emissions would be similar compared to the Project.

Alternative 2 would similarly exceed the regional air quality threshold for $NO_X$ emissions during overlap of construction activities. ~~Exceedance of the regional air quality threshold for $NO_X$ emissions would occur on a similar number of days as the Project. However, the maximum daily $NO_X$ emissions under Alternative 2 would be approximately six percent less than the Project.~~ Regional $NO_X$ emissions under Alternative 2 would similarly be reduced below the SCAQMD regional threshold during peak periods of construction with implementation of Mitigation Measures AIR-MM-1 and AIR-MM-2. However, $NO_X$ emissions during peak-periods of concurrent construction and operations from Alternative 2 and the Project would result in a significant short-term impact. Therefore, as with the Project, Alternative 2 would result in significant and unavoidable impacts associated with regional concurrent construction and operational emissions, and impacts would be similar to those of the Project.

Volume 2, Section V, Alternatives, page V-55, revise concluding statement as follows:

Under Alternative 3, construction activities would be reduced in comparison to the Project due to the reduction in excavation activities. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, similar to the Project, Alternative 3 would exceed the regional air quality threshold for $NO_X$ emissions during concurrent construction and operational activities. Therefore, while the reduction in excavation activities would reduce impacts associated with regional construction emissions as compared to the Project, impacts would remain significant and unavoidable.

Volume 2, Section V, Alternatives, page V-77, revise concluding statement as follows:

Under Alternative 4, construction activities would be reduced in comparison to the Project due to the reduction in development. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities because Alternative 4 would involve the same amount of excavation and demolition as the Project. Because maximum daily conditions are used for measuring impact significance, similar to the Project, Alternative 4 would exceed the regional air quality threshold for $NO_X$ emissions during concurrent construction and operational activities. Therefore, as with the Project,

Alternative 4 would result in significant and unavoidable impacts associated with regional construction emissions. However, such impacts would be less than those of the Project due to reduced construction activities.

Volume 2, Section V, Alternatives, page V-6, revise footnote 3 as follows:

Project-level and Cumulative regional emissions during peak days of concurrent construction and operations would be significant and unavoidable.

# Appendix B—Technical Appendix for Air Quality and Greenhouse Gas Emissions

Volume 3, Appendix B.1, Air Quality and Greenhouse Gas Emissions Methodology, Pages 16–17, replace text as follows:

> **Mitigation Measure AIR-MM-1:** During plan check, the Project representative shall make available to the lead agency and the South Coast Air Quality Management District a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used during any portion of the grading and excavation for Building A, Parking Structure F, and the subterranean parking garage and mat foundation (concrete pour) activities. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and California Air Resources Board or Air Quality Management District operating permit shall be available onsite at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off-road diesel-powered equipment within the construction inventory list described above shall meet the EPA Tier 4 Final standards ~~where commercially available~~.

The measure requires equipment to meet Tier 4 Final standards ~~where feasible for the following reasons:~~ and was determined to be feasible. Construction contractors that would work on the Project site have construction fleet mix that meet Tier 4 Final standards. Furthermore, additional review of the availability of off-road equipment meeting Tier 4 Final

standards was conducted. The California Air Resources Board (CARB) OFFROAD 2017 is an emissions model for heavy construction equipment used within California and includes heavy-duty equipment registration data within the State. The OFFROAD 2017 model indicates that Tier 4 equipment is readily available over the duration of proposed construction.[8] OFFROAD 2017 indicates that the equipment population meeting Tier 4 requirements represent approximately 63 percent of bore/drill rigs, 45 percent of cranes, and 71 percent of excavators. Given this level of availability, Mitigation Measure AIR-MM-1 is considered feasible.

- ~~Tier IV requirements went into effect in 2015, and it would not be reasonable to assume that the construction market would have a substantial amount of the newer equipment readily commercially available in 2020 when proposed grading/excavation/export activities would occur. The California Air Resources Board (CARB) OFFROAD 2017 is an emissions model for heavy construction equipment used within California and includes heavy-duty equipment registration data within the State. The OFFROAD 2017 model indicates that Tier 4 equipment may not currently be readily available.[8] Emissions generated from Project construction would exceed the SCAQMD significance threshold and would require bore/drill rigs, cranes, excavators, and pumps. OFFROAD 2017 indicates that the equipment population meeting Tier 4 requirements represent approximately 21 percent of bore/drill rigs, 10 percent of cranes, and 25 percent of excavators and pumps. Given such low availability and the number of construction projects ongoing and expected to be ongoing during Project construction, equipment meeting Tier 4 standards may not be commercially available when needed for Project construction, especially given the large size of the Project; and~~

- ~~On-site equipment emissions account for approximately 30 percent of the total peak daily regional $NO_x$ emissions, and, therefore, any reduction from use of Tier IV equipment would marginally reduce overall regional $NO_x$ emissions.~~

Consideration of alternative technologies and strategies were also considered ~~in the event equipment meeting Tier 4 Final standards is not feasible~~. Reducing the number and/or horsepower rating of construction equipment has already been considered in the Draft EIR. The analysis presented in the Draft EIR reflects the number and horsepower rating of construction equipment necessary to perform specific tasks in a proficient and safe manner. Limiting the number of daily construction haul truck trips was also considered in the analysis presented in the Draft EIR. However, to

reduce significant regional $NO_X$ impacts during the peak day of construction to less than significant would require the number of concrete trucks to be reduced by 57 percent and would not meet the requirements of a mat foundation.

Use of diesel trucks meeting ~~2007 or~~ 2010 model year engine standards (~~2007 or~~ 2010 trucks) or alternatively fueled trucks could potentially be an effective measure to reduce air pollution for facilities that have dedicated truck fleets (e.g., distribution facilities, such as those operated by Federal Express). ~~The CARB EMFAC2017 model indicates that trucks meeting 2010 engine standards are available in approximately 50 percent of the population. However, certain phases of Project construction such as concrete pours for mat foundation would require approximately 1,148 truck trips per day, and, in addition, concrete delivery activities typically rely on a mix of small independent contractors and a few companies with larger fleets. Therefore, this measure was not considered further in the Draft EIR.~~ Construction contractors that would work on the Project site requiring use of concrete delivery trucks for large mat pours and soil export haul trucks have fleet mix that meet 2010 model year engine standards. Therefore, this measure was considered feasible and included as Mitigation Measure AIR-MM-2.

Volume 3, Appendix B.2, Air Quality Worksheets, included additional calculations to quantify the reduction in construction emissions associated with implementation of Mitigation Measure AIR-MM-2.

[8] *California Air Resources Board OFFROAD2017—ORION database, www.arb.ca.gov/orion/, accessed February 2018 (attached in Appendix B).*

~~[8] California Air Resources Board OFFROAD2017—ORION database, www.arb.ca.gov/orion/, accessed February 2018 (Attached In Appendix XX).~~

## Appendix G—Noise Worksheets

Replace the Off-Site Construction Noise Worksheets with those included in Appendix FEIR-2.

## Appendix J—Transportation

Volume 3, Appendix J.3, Transportation Impact Study, Page 139, replace text as follows:

Haul trucks would travel on approved truck routes designated within the City. Given the Project Site's proximity to US 101, haul trucks arriving and departing the Project Site are likely to access US 101 via Sunset Boulevard and Hollywood Boulevard. Arriving haul trucks would exit US 101 ~~North~~ Southbound Off-ramp at Van Ness Avenue, then travel westbound along Sunset Boulevard and travel ~~toward~~ southbound on Gordon Street to the Project Site. Departing haul trucks would exit the site with a right turn onto Gordon Street and then a right turn onto Fountain Avenue or exit the site with a right turn on Fountain Avenue. Trucks would then turn right onto Gower Street traveling north, then turn right onto ~~Sunset~~ Hollywood Boulevard ~~and~~ travel~~ing~~ eastbound to access US 110 ~~Southbound~~ Northbound on-ramp and continue to the ~~Chiquita Canyon~~ Sunshine Landfill via SR 170, and I-5~~, Newhall Ranch Road, and Henry Mayo Drive~~.

# B. Effect of Corrections and Revisions

CEQA Guidelines Section 15088.5 requires that an EIR which has been made available for public review, but not yet certified, be recirculated whenever significant new information has been added to the EIR that results in new significant impacts. The entire document need not be circulated if revisions are limited to specific portions of the document.

The relevant portions of CEQA Guidelines Section 15088.5 read as follows:

> *(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. 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 include, 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 that 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 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. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)*

*(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 information contained in this section clarifies, amplifies, or refines information in the Draft EIR but does not make any changes that would meet the definition of "significant new information" as defined above. The information added to the Draft EIR does not change the Draft EIR in a way that deprives the public of a meaningful opportunity to comment upon a new or substantially increased significant environmental effect of the Project or disclose a feasible alternative or mitigation measure the Applicant has declined to adopt. As provided in the discussion below, the revisions, clarifications, and corrections to the Draft EIR would not result in new significant impacts or a substantial increase in any impact already identified in the Draft EIR.

## (1) Executive Summary

With respect to the additions and corrections to Section I, Executive Summary, the revisions involve strengthening the requirements of Mitigation Measure AIR-MM-1 and incorporation of an additional air quality mitigation measure. With incorporation of these additions, regional NOX emissions would be reduced below the SCAQMD regional threshold during peak periods of construction. However, regional NOX emissions during peak-periods of concurrent construction and operations from the Project would remain significant and unavoidable.

In addition, additions and corrections to Section I, Executive Summary, also included minor revisions to Mitigation Measure PAL-MM-1, Project Design Feature NOI-PDF-2, Mitigation Measure NOI-MM-1, and Mitigation Measure NOI-MM-2 as well as adding other elements to the Construction Management Plan in response to public comments.

However, the additional conditions added to Project Design Feature TR-PDF-1 do not result in any new impacts.

### (2) Project Description

With respect to Section II, Project Description, the additions and corrections provided above show that the local streets of the haul route have been modified by LADOT such that haul trucks leaving the Project Site would turn onto Fountain Avenue or Gordon Street, then continue on Gower Street and travel north to Hollywood Boulevard rather than Sunset Boulevard. This modification does not affect any of the EIR analyses other than noise. As shown in the corrections and additions above, with the modified haul route, Project-related truck trips would be dispersed across more segments and thus traffic noise along several of the haul route segments would be reduced. No new significant impacts would occur as a result of this modification.

### (3) Air Quality

With respect to the additions and corrections to Section I, Executive Summary, and Section IV.B. Air Quality, the revisions involve the strengthening the requirements of Mitigation Measure AIR-MM-1 by removing "where feasible" and a minor correction to indicate the Project representative make a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that with the exception of demolition activities will be used during any portion of construction available prior to demolition. In addition, the Project would implement a new mitigation measure (AIR-MM-2), which requires the use of on-road diesel concrete delivery and export haul trucks to meet CARB's 2010 engine emission standards. With incorporation of these additions, regional NOX emissions would be reduced below the SCAQMD regional threshold during peak periods of construction. However, regional NOX emissions during peak-periods of concurrent construction and operations from the Project would remain significant and unavoidable.

### (4) Paleontological Resources

The changes to Section IV.E, Paleontological Resources, of the Draft EIR include a minor correction of Mitigation Measure PAL-MM-1 to indicate that a qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site prior to demolition.

### (5) Noise

With respect to Noise, the corrections and additions provided above account for minor revisions to: (1) Project Design Feature NOI-PDF-2 by adding, "Written

documentation that the design of the screen complies with this measure shall be submitted at plan check."; (2) Mitigation Measure NOI-MM-1 by specifying building plans include documentation prepared by a noise consultant verifying compliance with this measure prior to demolition; and (3) Mitigation Measure NOI-MM-2 by indicating the Applicant retain the services of a structural engineer or qualified professional to visit the on-site historic buildings adjacent to the Project construction areas to inspect and document the apparent physical condition of the buildings' readily-visible features prior to the start of demolition. In addition, the corrections and additions provide above also account for the results of construction traffic noise for the three new segments in the haul route as modified by LADOT (i.e., Gower St. (north of Sunset), Hollywood Blvd., and Van Ness Avenue). As shown in the corrections and additions above, no new significant impacts would result from the modifications to the haul route. Rather, with the modified haul route, Project-related truck trips would be dispersed across more segments and thus traffic noise along several of the haul route segments would be reduced.

### (6) Transportation

With respect to the additions and corrections to Section IV.J, Transportation, revisions made include adding other elements to the Construction Management Plan in response to public comments. The additional conditions added to Project Design Feature TR-PDF-1 do not result in any new impacts. Rather, the additional conditions provide additional safety measures.

### (7) Appendix B

The changes to Appendix B.1 provide additional clarification regarding the feasibility of Mitigation Measure AIR-MM-1 and introduce the SCAQMD recommended Mitigation Measure AIR-MM-2. The changes to Appendix B.2 (including Appendix B.2(a)) include additional calculations to quantify the reduction in construction emissions associated with implementation of Mitigation Measure AIR-MM-2. These changes would not result in any changes to Air Quality impact conclusions.

### (8) Appendix G

The replacement noise worksheets included above relate to the modifications to the haul route. As discussed above, no new impacts associated with the modified haul route would occur.

### (9) Appendix J

The changes to Appendix J.3, Transportation Impact Study, of the Draft EIR involve updating the haul route for trucks departing the Project Site and clarifying that the Sunshine

Landfill will be used for export material, consistent with the assumption throughout the remainder of the EIR, including the air quality analysis. As discussed above, no new impacts would result from the implementation of the haul route specified by LADOT.

# C. Conclusion

Based on the supplemental analysis presented above, the revisions, clarifications, and corrections to the Draft EIR do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR or disclose a feasible alternative or mitigation measure the Applicant has declined to adopt. The revisions to the Draft EIR clarify, amplify, or refine the information in the Draft EIR. Thus, none of the conditions in Section 15088.5 of the CEQA Guidelines are met and recirculation of the Draft EIR is not required.