

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

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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 2143 Violet Street Project (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 three parts: Section III.A, General Corrections and Revisions to the Draft EIR; Section III.B, Corrections and Additions to Draft EIR Sections and Appendices; and Section III.C, 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 underlined text. Such changes are presented by EIR section.

### I. Executive Summary

Section I, Executive Summary, page I-12, amend the last sentence of the second full paragraph as follows:

These parking spaces would be located on the ground level and within six subterranean parking levels.

Section I, Executive Summary, page I-24, amend the third and fourth sentences as follows:

Metro is also considering the potential extension of the B (Red) and D (Purple) Lines' revenue service to the east and south from Union Station to the Arts District, with potential stations at 3rd Street and 6th Street. The Project Site is also located approximately 1.5 miles from the Metro L (Gold) Line Little Tokyo/Arts District Station.

Section I, Executive Summary, page I-44, amend the fifth sentence of the first full paragraph as follows:

The Project Site is also located 1.5 miles from the Metro L (Gold) Line Little Tokyo/Arts District and Pico/Aliso Stations.

Section I, Executive Summary, page I-50, amend the last full sentence as follows:

The Project Site is also located approximately 1.5 miles away from the Metro L (Gold) Line Little Tokyo/Arts District and Pico/Aliso Stations.

Section I, Executive Summary, page I-52, amend the ninth sentence of the first full paragraph as follows:

The Project Site is also located approximately 1.5 miles away from the Metro L (Gold) Line Little Tokyo/Arts District and Pico/Aliso Stations.

Section I, Executive Summary, page I-57 to 58, amend the last sentence of (2) Consistency with VMT Reduction Strategies and Policies as follows:

Specifically, the Project would increase density on the Project Site from five dwelling units per acre to 157 dwelling units per acre and from 48 jobs per acre to approximately 434 jobs per acre; introduce a mix of residential, retail, and office uses on the Project Site in proximity to other existing off-site residential, office, retail, restaurant, and industrial uses which would reduce VMT by encouraging walking and non-automotive forms of transportation; introduce new housing and jobs in close proximity to densely populated areas including Downtown Los Angeles; and increase transit accessibility by locating new housing and jobs within 0.25 mile of existing bus routes and approximately 1.5 miles of the Metro L (Gold) Line Little Tokyo/Arts District station.

Section I, Executive Summary, page I-61, amend the third sentence of the second full paragraph as follows:

The Project Site is also located 1.5 miles from the Metro L(Gold) Line Little Tokyo/Arts District station.

Section I, Executive Summary, page I-67, amend the last sentence of the second full paragraph as follows:

The Project Site is also located 1.5 miles from the Metro L(Gold) Line Little Tokyo/Arts District station.

Section I, Executive Summary, page I-115, amend the third sentence of the last paragraph as follows:

With respect to transit, the Project is located within walking distance of multiple bus stops and approximately 1.5 miles south of the Metro L(Gold) Line Little Tokyo/Arts District Station and the Metro L(Gold) Line Pico/Aliso Station.

Section I, Executive Summary, page I-151, amend the second sentence of Mitigation Measure TR-MM-1 as follows:

TDM program elements could include measures such as unbundled parking although the exact measures will be determined when the plan is prepared, provided that the estimated combined effect of the measures shall be to reduce the Project's residential and work VMT to below 7.7 and 7.5, respectively.

## II. Project Description

Section II, Project Description, page II-6, amend the second sentence of the first paragraph as follows:

As shown in Table II-1 on page II-7, proposed new uses would include 347 live-work units, of which 5 percent of the total proposed units (18 units) would be set aside for Extremely Low Income Households, and 11 percent of the total proposed units (39 units) would be set aside for Very Low Income Households, approximately 187,374 square feet of office space,

~~square~~–21,858 square feet of commercial retail/restaurant floor area, and 926-square-foot community room that residents could use for art creation.

Section II, Project Description, page II-13, amend the last sentence of the last full paragraph as follows:

These parking spaces would be located on the ground level and within six subterranean parking levels.

### **III. Environmental Setting**

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

#### **IV.A. Air Quality**

Section IV.A, Air Quality, page IV.A-9, amend the second sentence of the second paragraph as follows:

The 2016 AQMP incorporates the Southern California Association of Governments' (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) and updated emission inventory methodologies for various source categories.<sup>5a</sup>

<sup>5a</sup> The 2020–2045 RTP/SCS was approved by SCAG on September 3, 2020, and certified by CARB on October 30, 2020. Consistency with the 2020–2045 RTP/SCS is therefore analyzed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of the Final EIR. However, the 2016 AQMP relies on the 2016–2040 RTP/SCS.

Section IV.A, Air Quality, page IV.A-43, amend the fifth and sixth sentences of the first paragraph as follows:

Metro is also considering the potential extension of the B (Red) and D (Purple) Lines' revenue service to the east and south from Union Station to the Arts District, with potential stations at 3rd Street and 6th Street. The Project Site is also located approximately 1.5 miles from the Metro L (Gold) Line Little Tokyo/Arts District Station.

#### **IV.B. Cultural Resources**

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

## IV.C. Energy

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

## IV.D. Geology and Soils—Paleontological Resources

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

## IV.E. Greenhouse Gas Emissions

Section IV.E, Greenhouse Gas Emissions, page IV.E-29, insert the following after the last paragraph:

The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) was approved by SCAG on September 3, 2020, and certified by CARB on October 30, 2020. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State’s GHG emission reduction goals. Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita. The reductions generated by fuel economy improvements are already included as part of the State’s GHG emissions reduction program and are not double-counted in the SB 375 target calculation.

Section IV.E, Greenhouse Gas Emissions, page IV.E-39, amend the last paragraph as follows:

A consistency analysis is provided and describes the Project’s compliance with or conflict with performance-based standards included in the regulations outlined in the applicable portions of the *Climate Change Scoping Plan*, 2016–2040 RTP/SCS, 2020–2045 RTP/SCS, and the Sustainable City pLAN/L.A.’s Green New Deal.

Section IV.E, Greenhouse Gas Emissions, page IV.E-52, amend the second sentence of the consistency analysis for “Updated Scoping Plan: By 2019, adjust performance measures used to select and design transportation facilities” as follows:

However, the Project is located approximately 1.5 miles from the Metro L (Gold) Line and Regional Connector Little Tokyo/Arts District Station (currently under construction and slated for operation in 2021).

Section IV.E, Greenhouse Gas Emissions, page IV.E-57 to 58, amend the last sentence of the *(iv) Consistency with VMT Reduction Strategies and Policies* as follows:

Specifically, the Project would increase density on the Project Site from five dwelling units per acre to 157 dwelling units per acre and from 48 jobs per acre to approximately 434 jobs per acre; introduce a mix of residential, retail, and office uses on the Project Site in proximity to other existing off-site residential, office, retail, restaurant, and industrial uses which would reduce VMT by encouraging walking and non-automotive forms of transportation; introduce new housing and jobs in close proximity to densely populated areas including Downtown Los Angeles; and increase transit accessibility by locating new housing and jobs within 0.25 mile of existing bus routes and approximately 1.5 miles of the Metro L (Gold) Line Little Tokyo/Arts District station.

Section IV.E, Greenhouse Gas Emissions, page IV.E-61, insert the following after the first full paragraph:

*(viii) 2020–2045 RTP/SCS*

Like the 2016–2040 RTP/SCS, the goal of the 2020–2045 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning and transportation options. To accomplish this goal, the 2020–2045 RTP/SCS identifies various strategies to reduce per capita VMT. The 2020–2045 RTP/SCS RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.

In addition to demonstrating the region’s ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth

in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency.<sup>109A</sup> These strategies and policies are addressed below.

#### Consistency with VMT Reduction Strategies and Policies

The 2020–2045 RTP/SCS includes, for the SCAG region as a whole, a daily 23.2 Total VMT per capita for the 2016 Base Year, and a daily 20.7 Total VMT per capita for the 2045 Plan Year. For Los Angeles County, the 2016 Base Year daily Total VMT per capita is 22.2 and the daily Total VMT per capita is 19.2 for the 2045 Plan Year. To analyze the consistency of the Project with the 2020–2045 RTP/SCS, the Project’s Total Daily VMT was divided by the Project’s service population to arrive at the per capita Total Daily VMT estimates. The estimate, as provided in Table IV.E-7 on page IV.E-58, was compared to the VMT data for the region and Los Angeles County provided by the 2020–2045 RTP/SCS. As shown below, the Project VMT per capita of 7.7 VMT per day for residents and 7.5 VMT per day for employees would be well below the Los Angeles County Total Daily VMT per capita of 19.2 for the 2045 Plan Year. As discussed above, the Project design includes characteristics that would reduce trips and VMT as compared to the Project without implementation of VMT reducing measures within the Air Basin as measured by CalEEMod. These relative reductions in vehicle trips and VMT from the Project without implementation of VMT reducing measures within the Air Basin help quantify the GHG emissions reductions achieved by locating the Project in an infill, HQTAs area that promotes alternative modes of transportation. As discussed above, incorporation of USEPA Mixed-Use Development (MXD) VMT reduction features applicable to the Project results in a 23-percent reduction in overall VMT and resultant pollutant emissions compared to baseline ITE trip generation rates. Furthermore, with implementation of Mitigation Measure TR-MM-1, implementation of a TDM program, the Project would result in a 28-percent reduction in overall VMT and associated emissions. This reduction in VMT is substantially better than the goal of the 2020–2045 RTP/SCS with an estimated 19-percent decrease in per capita GHG emissions from passenger vehicles by 2035.<sup>109B</sup>

The Project would also be consistent with the following key GHG reduction strategies in SCAG’s 2020–2045 RTP/SCS, which are based on changing the region’s land use and travel patterns<sup>109C</sup>

- New housing and job growth focused in HQTAs;

- Limit total acreage of greenfield or otherwise rural land uses converted to urban use; and
- Reduce VMT per capita.

As discussed above, the Project represents an infill development within an existing urbanized area that would introduce new residential, retail, and office uses, within an HQTAs which is well served by public transportation. In addition, the Project VMT per capita of 7.7 VMT per day for residents and 7.5 VMT per day for employees would be well below the Los Angeles County Total Daily VMT per capita of 19.2 for the 2045 Plan Year.

The Project would also provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. The increase in bicycle parking spaces provided on-site would further reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation. Project design would also provide pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets to encourage people to walk instead of drive. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

#### Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2020–2045 RTP/SCS, with regard to individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. The Project would provide at least 30 percent of the total LAMC-required parking spaces provided to be capable of supporting future EVSE and at least 10 percent of the total LAMC-required parking spaces with EV charging stations as dictated by City requirements.

#### Energy Efficiency Strategies and Policies

The third goal within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. As discussed in Section II, Project Description, of the Draft

EIR, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not limited to WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use; Energy Star-labeled appliances; and water-efficient landscape design. In addition, Project Design Feature GHG-PDF-1 would require the design of the new buildings to incorporate features to further reduce energy usage. Furthermore, the Project would be subject to the 2019 Title 24 Standards which represent “challenging but achievable design and construction practices” that represent “a major step towards meeting the Zero Net Energy (ZNE) goal.” Nonresidential buildings built with the 2019 standards will use about 30 percent less energy due mainly to lighting upgrades<sup>109D</sup>

**Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2020–2045 RTP/SCS. As such, impacts related to consistency with the 2020–2045 RTP/SCS would be less than significant.**

<sup>109A</sup> SCAG, Draft Program EIR for the 2020–2045 RTP/SCS, Section 3.8, Greenhouses, page 3.8-61, December 2019.

<sup>109B</sup> Connect SoCal can reach the target of reducing greenhouse gases, or GHGs, from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels).

<sup>109C</sup> SCAG 2020–2045 RTP/SCS. Table 5.1 Connect SoCal Performance Measures and Results.

<sup>109D</sup> CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.

Section IV.E, Greenhouse Gas Emissions, page IV.E-61, amend subheading (viii) as follows:

~~(viii)~~ (ix) City of Los Angeles Sustainable City pLAN/L.A.’s Green New Deal

Section IV.E, Greenhouse Gas Emissions, page IV.E-63, amend the last sentence of the consistency analysis for “Ensure 57 percent of new housing units are built within 1500 ft of transit by 2025; and 75 percent by 2035” as follows:

The Project is also located approximately 1.5 miles from the Metro L(Gold) Line Little Tokyo/Arts District station.

Section IV.E, Greenhouse Gas Emissions, page IV.E-63, amend the first full sentence after Table IV.E-8 as follows:

The Project Site is also located 1.5 miles from the Metro L(Gold) Line Little Tokyo/Arts District station.

Section IV.E, Greenhouse Gas Emissions, page IV.E-64, amend subheading (ix) as follows:

~~(ix)~~ (x) *Post-2030 Analysis*

Section IV.E, Greenhouse Gas Emissions, page IV.E-65, amend subheading (x) as follows:

~~(x)~~ (xi) *Conclusion*

Section IV.E, Greenhouse Gas Emissions, page IV.E-70, amend the last sentence of the last paragraph as follows:

The Project Site is also located 1.5 miles from the Metro L(Gold) Line Little Tokyo/Arts District station.

Section IV.E, Greenhouse Gas Emissions, page IV.E-72, amend the first sentence of subsection (c) as follows:

In summary, the plan consistency analysis provided above demonstrates that the Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the *Climate Change Scoping Plan* and subsequent updates, the 2016–2040 RTP/SCS, the 2020–2045 RTP/SCS, and the Sustainable City pLAn/L.A.'s Green New Deal.

## **IV.F. Land Use**

Section IV.F, Land Use, page IV.F-7, revise the first full paragraph and its accompanying footnotes as follows:

The City of Los Angeles Department of City Planning is currently updating the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (~~sometimes known as DTLA~~), in a combined planning process referred to as the ~~DTLA 2040~~ Downtown Community Plan. The purpose of the ~~DTLA 2040~~ Downtown Community Plan is to create and implement a future vision for Downtown Los Angeles.<sup>4</sup> Specifically, the following core principles represent the long-term priorities for the ~~DTLA 2040~~ Downtown Community Plan:<sup>5</sup>

<sup>4</sup> *City of Los Angeles, Downtown Los Angeles Community Plan Update, ~~https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update, accessed March 30, 2020~~ https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about, accessed October 14, 2020.*

<sup>5</sup> *City of Los Angeles, ~~DTLA 2040, June 2019 Draft~~ Downtown Community Plan, Summer 2020 Draft.*

Section IV.F, Land Use, page IV.F-7, amend the first bullet point as follows:

- Accommodate anticipated growth ~~through 2040~~ in an inclusive, equitable, sustainable, and healthy manner

Section IV.F, Land Use, page IV.F-9, revise the second bullet point as follows:

- Create a World-Class ~~Streets and~~ Public Realm

Section IV.F, Land Use, page IV.F-9, revise the first paragraph and its accompanying footnotes as follows:

As currently proposed by the draft ~~DTLA 2040~~ Downtown Community Plan, the Project Site will be designated as Hybrid Industrial, ~~which will allow with~~ a maximum floor area ratio (FAR) of ~~between 3:1 to 6:1~~, with general uses that include creative office, live/work, manufacturing, and production activity.<sup>6</sup> The ~~DTLA 2040~~ Downtown Community Plan proposes the following description of the Hybrid Industrial area:<sup>7</sup>

<sup>6</sup> *City of Los Angeles, ~~DTLA 2040, June 2019 Draft~~ Downtown Community Plan, Summer 2020 Draft.*

<sup>7</sup> *City of Los Angeles, ~~DTLA 2040, June 2019 Draft~~ Downtown Community Plan, Summer 2020 Draft.*

Section IV.F, Land Use, page IV.F-9, amend the last sentence of the third paragraph as follows:

A Draft EIR regarding the ~~DTLA 2040~~ Downtown Community Plan ~~is anticipated to be released in the coming months~~ was released on October 6, 2020.

Section IV.F, Land Use, page IV.F-9, amend footnote 8 as follows:

<sup>8</sup> ~~City of Los Angeles, Downtown Los Angeles Community Plan Update, Timeline, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#timeline>, accessed March 30, 2020~~ Downtown Community Plan Update/New Zoning Code for Downtown Community Plan, <https://planning.lacity.org/development-services/eir/downtown-community-plan-updatenew-zoning-code-downtown-community-plan>, accessed October 10, 2020.

Section IV.F, Land Use, page IV.F-15, amend the first full paragraph and its accompanying footnote as follows:

In addition, since 2008, a number of other planning and policy studies have been undertaken involving industrial land policy. For example, as noted above, the City is currently preparing the ~~DTLA 2040~~ Downtown Community Plan which would include the Project Site to support and sustain the ongoing revitalization of the area. The ~~DTLA 2040~~ Downtown Community Plan proposes to modify the land use designations for the downtown area. As noted above, the Project Site would be designated as Hybrid Industrial under the ~~DTLA 2040~~ Downtown Community Plan, which are areas to “preserve productive activity and prioritize space for employment, including light industrial, new industry, commercial, and vertically-integrated businesses, with careful introduction of live-work uses.”<sup>15</sup>

<sup>15</sup> ~~City of Los Angeles, DTLA 2040, June 2019 Draft Downtown Community Plan, Summer 2020 Draft.~~

Section IV.F, Land Use, page IV.F-15, amend the first sentence of the second full paragraph as follows:

Regional land use plans that govern the project area include the Southern California Association of Governments’ (SCAG) ~~2016–2040~~ Regional Transportation Plan/Sustainable Communities Strategy (~~2016–2040~~ RTP/SCS) and the South Coast Air Quality Management District (SCAQMD) administers the Air Quality Management Plan (AQMP), which addresses the

attainment of state and federal ambient air quality standards throughout the South Coast Air Basin.

Section IV.F, Land Use, page IV.F-15, amend subheading (a) as follows:

*(a) Southern California Association of Governments' 2016–  
2040 Regional Transportation Plan/Sustainable  
Communities Strategy*

Section IV.F, Land Use, page IV.F-16, insert the following after the first partial paragraph:

On September 3, 2020, SCAG's Regional Council adopted its 2020–2045 RTP/SCS, Connect SoCal. Connect SoCal's core vision is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal includes new initiatives at the intersection of land use, transportation, and technology to reach the region's GHG reduction goals. As was the case under the prior RTP/SCS, the Project Site is located within an HQTAs as designated by the 2020–2045 RTP/SCS.

Section IV.F, Land Use, page IV.F-16, amend the first full paragraph as follows:

The Project's consistency with the applicable goals of the 2016–2040 RTP/SCS is discussed in the impact analysis below. A detailed list of the goals of the 2016–2040 RTP/SCS applicable to the Project is included in Table 6 of Appendix G of this Draft EIR along with a discussion of whether the Project does or does not conflict with that particular goal. In addition, a consistency analysis with applicable goals of the 2020–2045 RTP/SCS is provided below along with a discussion of whether the Project does or does not conflict with that particular goal is provided in Table 7 of Appendix G of the Draft EIR.

Section IV.F, Land Use, page IV.F-33, insert the following after the first partial paragraph:

*(c) Consistency with the 2020–2045 Regional Transportation  
Plan/Sustainable Communities Strategy*

The Project's general consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is analyzed in Table 7 of Appendix G of the Draft EIR. As detailed therein, the Project would be generally consistent with the

applicable goals set forth in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety, as well as protect the environment and health of the region’s residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site’s location within a SCAG-designated HQTAs and City-designated TPAs, as defined in ZI File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote the use of bicycles. The Project also includes adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and walking and biking.

Section IV.F, Land Use, page IV.F-33, amend subheading (c) as follows:

~~(e)~~ (d) *Conclusion Regarding Land Use Impacts Related to Regulatory Consistency*

Section IV.F, Land Use, page IV.F-33, amend subheading (d) as follows:

~~(d)~~ (e) *Spot Zoning*

Section IV.F, Land Use, page IV.F-34, amend subheading (e) as follows:

~~(e)~~ (f) *Industrial Displacement*

## **IV.G. Noise**

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

## **IV.H.1 Public Services—Fire Protection**

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

## **IV.H.2 Public Services—Police Protection**

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

## **IV.H.3 Public Services—Schools**

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

## **IV.H.4 Public Services—Libraries**

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

## **IV.H.5 Public Services—Parks and Recreation**

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

## **IV.I. Transportation**

Section IV.I, Transportation, page IV.I-13, amend the second and third sentences of the last paragraph as follows:

The Project is located approximately 1.5 miles south of the Metro L (Gold) Line Little Tokyo/Arts District Station and the Metro L (Gold) Line Pico/Aliso Station. In addition, the Project Site is located approximately 2 miles east of the Metro E (Blue)/E (Expo)/B (Red)/D (Purple) Lines 7th Street/Metro Center Station and the Metro Blue Line Washington Station.

Section IV.I, Transportation, page IV.I-25, amend the third sentence of the last paragraph as follows:

With respect to transit, the Project is located within walking distance of multiple bus stops and approximately 1.5 miles south of the Metro L (Gold) Line Little Tokyo/Arts District Station and the Metro L (Gold) Line Pico/Aliso Station.

Section IV.I, Transportation, page IV.I-31, amend the second sentence of Mitigation Measure TR-MM-1 as follows:

TDM program elements could include measures such as unbundled parking although the exact measures will be determined when the plan is prepared, provided that the estimated combined effect of the measures shall

be to reduce the Project's residential and work VMT to below 7.7 and 7.5, respectively.

Section IV.I, Transportation, page IV.I-36 and IV.I-37, amend subsection (b) Vehicle Miles Traveled as follows:

As discussed in the TAG, long-term or cumulative effects are determined through a consistency check with SCAG's 2016–2040 RTP/SCS and projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and greenhouse gas reduction goals of the RTP/SCS. While the Project is projected to have a significant and unavoidable household VMT impact, given its location in a dense area of the City of Los Angeles served by public transit, the mixed-use nature of the Project, its provision of features to encourage walking and bicycling, and the TDM program required by Mitigation Measure TR-MM-1, the Project would be consistent with the applicable goals and objectives of both the 2016–2040 and 2020–2045 RTP/SCS to locate jobs and housing in infill locations served by public transportation and facilitating active transportation and TDM (refer to Section IV.C, Greenhouse Gas Emissions, and Section IV.F, Land Use, of this Draft EIR for more detailed consistency analyses). **Therefore, the Project would be consistent with the long-term VMT and GHG reduction goals of both the 2016–2040 and 2020–2045 RTP/SCS and, as a result, the Project's contribution to cumulative impacts would not be cumulatively considerable. Thus, the Project's cumulative impacts with respect to CEQA Guidelines Section 15064.3 would be less than significant.**

## **IV.J. Tribal Cultural Resources**

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

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

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

### **IV.K.2 Utilities and Service Systems—Wastewater**

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

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

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

## V. Alternatives

Section V, Alternatives, page V-9, amend the text in the Fire Protection, Operation cell for Alternative 4 in Table V-1 as follows:

<b>Impact Area</b>	<b>Alternative 4: DTLA 2040 Community Plan Update Mixed-Use Alternative</b>
<i>Operation</i>	<del>Greater</del> <u>Similar</u> (Less Than Significant)

Section V, Alternatives, page V-73, amend the last sentence of the second full paragraph as follows:

Therefore, impacts associated with new or physically altered government facilities would be less than significant and ~~greater than~~ similar to the less-than-significant impacts of the Project ~~due to the increase in service population.~~

## VI. Other CEQA Considerations

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

## VII. References

Section VII, References, page VII-8, amend line items seven through nine as follows:

City of Los Angeles. Downtown Los Angeles Community Plan Update, ~~<https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>~~, accessed March 30, 2020 <https://planning.lacity.org/plans-policies/community-plan-update/downtown->

los-angeles-community-plan-update#about, accessed October 14, 2020.

City of Los Angeles.—~~Downtown Los Angeles Community Plan Update, Timeline, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#timeline>, accessed March 30, 2020~~ Downtown Community Plan Update/New Zoning Code for Downtown Community Plan, <https://planning.lacity.org/development-services/eir/downtown-community-plan-updatenew-zoning-code-downtown-community-plan>, accessed October 10, 2020.

City of Los Angeles.—~~DTLA 2040, June 2019 Draft~~ Downtown Community Plan, Summer 2020 Draft.

Section VII, References, page VII-21, insert the following after the first line item:

SCAG. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, adopted September 2020.

## VIII. Acronyms and Abbreviations

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

## IX. List of Preparers

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

## Appendix G—Land Use Consistency Tables

Appendix G, page 22, insert Table 7 after Table 6:

**Table 7**  
**Applicable Goals and Principles of SCAG’s 2020–2045 RTP/SCS**

<u>Goals</u>	<u>Would the Project Conflict?</u>
Improve mobility, accessibility, reliability, and travel safety for people and goods.	<b>No Conflict.</b> Although this goal applies at a regional level, the Project would be developed in an existing urbanized area in close proximity to transit. The Project Site is currently served by multiple local and regional Metro bus lines, and the Greyhound Bus Terminal is located approximately 0.3 mile west of the Project Site on 7th Street. In addition, the Project would provide 257 long-term and short-term bicycle parking

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

<u>Goals</u>	<u>Would the Project Conflict?</u>
	spaces for residents, employees, and visitors. The availability and accessibility of public transit in the Project area is documented by the Project Site's location within a designated SCAG HQTAs. In summary, the Project would maximize mobility, accessibility, and overall productivity of our transportation system by providing opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, which would reduce VMT.
<u>Increase person and goods movement and travel choices within the transportation system.</u>	<b>No Conflict.</b> Although this goal applies at a regional level, the Project would be developed within an existing urbanized area that provides an established network of roads, freeways, and transit that provide local and regional access to the area, including the Project Site. Specifically, the Project includes the development of 347 new live-work units, 187,374 square feet of office space, 21,858 square feet of retail/restaurant uses, and a 926 square foot community room within a SCAG-designated HQTAs and TPA as defined in PRC Section 21099. Further, multiple local and regional bus lines providing connections to Downtown subway stations, including Pershing Square and 7th Street/Metro Center, operate in the vicinity of the Project Site. The closest bus stop to the Project Site is the stop for Metro Local Line 60 at the corner of South Santa Fe Avenue and Violet Street. Other nearby bus lines include Metro Local Line 18, which provides service east/west from the City of Montebello to the Wilshire Center area, and Metro Local Line 62, which provides service from Downtown Los Angeles, east to Santa Fe Springs, and south to Hawaiian Gardens. Additionally, the Greyhound Bus Terminal is located approximately 0.3 mile west of the Project Site on 7th Street, which provides inter-city bus service to various locations outside of the Los Angeles. The Project would also promote bicycle use through the provision of a total of 257 bicycle parking spaces for Project Uses. The Project would enhance pedestrian access along the perimeter of the Project Site and new trees and landscaping would also be provided.
<u>Reduce greenhouse gas emissions and improve air quality.</u>	<b>No Conflict.</b> As evaluated in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less than significant impacts related to air quality during both construction and operation. As identified in Section II, Project Description, and Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, the Project would include specific project design features to further support and promote environmental sustainability. These features consist of compliance with regulatory requirements, including the provisions set forth in the CALGreen Code that have been incorporated into the City of Los Angeles Green Building Code. These features also include energy conservation, water conservation, and waste reduction features. While these measures are intended to reduce GHG emissions, they would also improve air quality.
<u>Support healthy and equitable communities</u>	<b>No Conflict.</b> Although this goal applies at a regional level, the Project would support its implementation. As discussed above,

<u>Goals</u>	<u>Would the Project Conflict?</u>
	the Project would promote alternative methods of transportation through the provision of a total of 257 bicycle parking spaces for Project uses. The Project's location within an area surrounded with commercial uses and well-served by transit would promote walking and other forms of active transportation.
<u>Adapt to changing climate and support an integrate regional development pattern and transportation network.</u>	<b>No Conflict.</b> While this is a regional policy, the Project would support its implementation by developing a mixed-use development within a designated HQTAs and TPAs. As discussed above, the Project Site is well served by transit including multiple local and regional bus lines providing connections to Downtown subway stations, including Pershing Square and 7 <sup>th</sup> Street/Metro Center. The Project would also encourage alternative modes of transportation through the provision of bicycle parking and improvements to the pedestrian realm. As also discussed above, Project impacts with respect to GHG emissions would be less than significant.
<u>Encourage development of diverse housing types in areas that are supported by multiple transportation options.</u>	<b>No Conflict.</b> The Project would develop 347 new live-work units, of which 5 percent of the total proposed units (18 units) would be set aside for Extremely Low Income Households, and 11 percent of the total proposed units (39 units) would be set aside for Very Low Income Households. The range of housing opportunities by type and cost will be accessible to residents at a variety of income levels. The Project will include 144 1-bedroom units, 149 2-bedroom units, and 60 3-bedroom units. The proposed housing would be located in an area well-served by public transit and an HQTAs as designated in the 2020–2045 RTP/SCS.
<hr/> <p><i>Source: Eyestone Environmental, 2020.</i></p>	

## 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. 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 additions and corrections above reflect updated line designations used by the Los County Metropolitan Transportation Authority (Metro), a correction to a minor omission from the Project Description, and a consistency analysis with the 2020–2045 RTP/SCS, which is substantively similar to the 2016–2040 RTP/SCS. 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, fully considers and responds to comments stating 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.