

II. Responses to Comments

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A. Introduction

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft EIR. CEQA Guidelines Section 15088(a) states that "[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments that were received during the notice comment period and any extensions and may respond to late comments." In accordance with these requirements, this section of the Final EIR provides the responses prepared by the City of Los Angeles Department of City Planning (City) to each of the written comments received regarding the Draft EIR.

Section II.B, Matrix of Comments Received on the Draft EIR, includes a table that summarizes the environmental issues raised by each commenter regarding the Draft EIR. Section II.C, Responses to Comments, provides the City's responses to each of the written comments raised in the comment letters received on the Draft EIR. Copies of the original comment letters are provided in Appendix FEIR-1 of this Final EIR.

II. Responses to Comments

B. Matrix of Comments Received on the Draft EIR

Table II-1
Matrix of Comments Received on the Draft EIR

Letter No.	Commenter	Executive Summary	Project Description	Environmental Setting	Air Quality	Cultural Resources	Energy	Geology and Soils--Paleontological Resources	Greenhouse Gas Emissions	Land Use	Noise	Public Services--Fire Protection	Public Services--Police Protection	Public Services--Schools	Public Services--Parks and Recreation	Public Services--Libraries	Transportation	Tribal Cultural Resources	Utilities and Service Systems--Water Supply and Infrastructure	Utilities and Service Systems--Wastewater	Utilities and Service Systems--Energy Infrastructure	Alternatives	Other CEQA Considerations
STATE AND REGIONAL																							
1	Miya Edmonson IGR/CEQA Branch Chief Caltrans District 7 100 S. Main St., Ste. 100 Los Angeles, CA 90012-3712																X						
INDIVIDUALS																							
2	London O'Donnell londonkaye@gmail.com										X												

II. Responses to Comments

C. Comment Letters

Comment Letter No. 1

Miya Edmonson
IGR/CEQA Branch Chief
Caltrans District 7
100 S. Main St., Ste. 100
Los Angeles, CA 90012-3712

Comment No. 1-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project would develop 347 new live-work units, 187,374 sq. ft. of new office space, 21,858 sq. ft. of new retail/restaurant floor area, and 926 sq. ft. of artist production amenity space. The new uses would be located in a 15-story building with a maximum height of 179 feet. Five existing buildings that comprise approx. 56,686 sq. ft. would be retained with office, retail, restaurant, warehouse, and live-work units. Two existing buildings containing 4 live work units, and 2 open sheds would be removed. Upon completion, up to 569,448 sq. ft. of floor area would be located within the project site, including the existing floor area to remain, resulting in a maximum FAR of 6.0:1. The project would also provide 828 vehicular parking spaces and 257 bicycle parking spaces (47 short -term and 210 long-term) within six subterranean parking levels.

The nearest State facilities to the proposed project are US 101, I-5, SR 60, and I-10.

Response to Comment No. 1-1

This introductory comment, which summarizes the Project Description and Caltrans facilities near the Project Site, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 1-2

After reviewing the DEIR, Caltrans has the following comments:

Caltrans acknowledges and supports infill development that prioritizes nearby transit service, promotes active transportation, and provides a mixture of land uses that keeps the goods and services people need in close proximity to where they work and live. Caltrans commends the Project's inclusion of bike parking, new sidewalks and street trees, pedestrian scale lighting, unbundled motor-vehicle parking, and a commute trip reduction program for onsite workers. The inclusion of these measures has mitigated the work vehicle miles travelled (VMT) per employee to a level of less than significant.

Response to Comment No. 1-2

This comment states Caltrans' support for infill development near transit and commends the Project's inclusion of active transportation and transportation demand management (TDM) measures. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 1-3

However, there is still room for improvement, as the DEIR has stated that there is still a significant household VMT impact when compared to LA's adopted VMT thresholds for the Central LA APC Area. Caltrans believes that due to the amount of motor vehicle parking being provided, the 2143 Violet Street Project is still designed in a way that induces demand for additional vehicle trips. This demand should be addressed with appropriate design and management principles. Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. Housing affordability can also be improved by not building an unnecessary amount of very expensive, subterranean parking.

Response to Comment No. 1-3

This comment suggests design and management principles, such as a reduction in parking, as potential mitigation for the Project's significant and unavoidable household VMT impact. While the Project provides a total of 828 vehicle parking spaces, 45 more spaces than what is required by the Los Angeles Municipal Code (LAMC), due to the existing lack of both on- and off-street parking in the area, unbundling of parking is one of the management strategies that could be included in the Project's TDM plan required by Mitigation Measure TR-MM-1 (as noted in Comment 1-2). As such, this strategy was included as part of the Draft EIR's analysis of the effectiveness of the TDM program in

TR-MM-1 in reducing Project VMT, although the household VMT impact remains significant and unavoidable. The California Air Pollution Control Officers Association¹ (whose research underlies much of the TDM effectiveness calculations in the City's VMT Calculator²) suggests a maximum cap on overall VMT reduction depending on the characteristics of the location in which the project is located and this maximum was reached with the unbundled parking, suggesting that additional strategies would not further reduce the household VMT materially. Nevertheless, this comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 1-4

Caltrans also recommends that at least one long-term bicycle parking space be provided per residential unit, allowing residents to more easily take advantage of the project's central location and choose the bicycle as their mode of travel. Long-term bicycle parking should be located onsite, on the ground floor, and within 200 feet of the pedestrian entrance to the main building.

Response to Comment No. 1-4

This comment suggests one long-term bicycle parking space be provided per residential unit. Pursuant to LAMC Section 12.21 A.16, the Project is required to provide long-term and short-term parking spaces, depending on the total number of units provided. As shown in Table II-2 on page II-6, the Project complies with LAMC required number of bicycle parking spaces.

As shown in Table II-2, the Project would provide 257 bicycle parking spaces (47 short-term and 210 long-term) as required by the LAMC. These parking spaces would be located on the ground level and within six subterranean parking levels and would be required to meet the LAMC bicycle parking design standards. The provision of ground level parking was inadvertently left out of the Project Description and is included in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of this Final EIR. There are no existing bicycle facilities within 0.5 mile of the Project Site. The effectiveness of providing these bicycle parking spaces as part of the Project is incorporated within the VMT Calculator analysis presented in the Draft EIR. Providing additional bicycle parking spaces as suggested in the comment would not materially reduce the estimated household VMT

¹ California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures, 2010*.

² LADOT, *TDM Strategy Appendix, Attachment G, Transportation Demand Strategies in the LA VMT calculator*, https://ladot.lacity.org/sites/default/files/2020-03/tdm_strategy_appendixb.pdf, accessed September 13, 2020.

**Table II-2
Bicycle Parking Calculation**

Use	Project Area/Units	Required Spaces by LAMC (short-term/long-term)	Short-Term Spaces	Long-Term Spaces	Total Required
1–25 du	25	1 per 10 units/1 unit	3	25	28
26–100 du	75	1 per 15 units/1.5 units	5	50	55
101–200 du	100	1 per 20 units/2 units	5	50	55
201+ du	147	1 per 40 units/4 units	4	37	41
Office	187,347 sf	1 per 10,000 sf/5,000 sf (minimum 2)	19	37	56
Commercial	21,858 sf	1 per 2,000 sf/2,000 sf (minimum 2)	11	11	22
Total Required/ Provided			47	210	257

du = dwelling units
Source: LAMC; Eyestone Environmental, 2020.

per capita further and would not be warranted. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 1-5

Additionally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Response to Comment No. 1-5

The comment states that transportation of heavy equipment and/or oversized vehicles on State highways requires a permit from Caltrans and Caltrans supports that construction related traffic be limited to off-peak commute periods to the extent possible. The Project will comply with any Caltrans permit requirements regarding transportation of equipment or materials. This comment is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment No. 1-6

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2018-03289.

Response to Comment No. 1-6

This comment, which concludes the letter and provides a point of contact, is noted for the record and will be forwarded to the decision makers for their review and consideration.

Comment Letter No. 2

London O'Donnell
londonkaye@gmail.com

Comment No. 2-1

I am a resident at 726 S Santa Fe and received a surprising letter a few weeks ago. I must say I do not approve of the construction in Environmental Case NO: ENV-2017-438-EIR. I have a live/work loft that looks out over where the construction project will be and have recently renewed my lease back on June 1st for another year (prior to receiving this letter.) As you might imagine, with Covid-19 [sic] I am working from home. My job requires filming video and teaching students regularly at home. With significant and unavoidable Construction Noise and Vibration, I will not be able to do my job. Please let me know if there is any more information you can share in terms of the timeline for the project because I will have to move if construction begins. If that happens, I would kindly ask for all moving expenses and any broken lease agreement penalties to be paid for by ONNI Capital LLC. I hope you understand my concern.

Thank You,

Response to Comment No. 2-1

This comment expresses concern over the Project's significant and unavoidable noise and vibration impacts during construction. Based on the commenter's address, their residence is represented by noise receptor location R2. Receptor R2 is mostly shielded from the Project Site by intervening development, and, as discussed in Section IV.G, Noise, of the Draft EIR, both Project-level and cumulative on-site construction noise and vibration impacts at this location would be less than significant without mitigation. With respect to construction schedule, as discussed in Section II, Project Description, of the Draft EIR, Project construction is expected to begin in 2021 and be complete by early 2024.