

CHAPTER 3 – REVISIONS, CLARIFICATIONS, AND CORRECTIONS TO THE DRAFT EIR

In accordance with CEQA Guidelines Section 15132(a), this chapter of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or supplement the environmental impact analysis for the 656 San Vicente Medical Office Project (Project). These revisions, clarifications, and corrections are the result of the responses to public and agency comments received on the Draft EIR, new information that has become available since publication of the Draft EIR, or due to recognition of inadvertent errors or omissions. The revisions, clarifications, and corrections provided in this chapter do not result in any significant new information or support a conclusion that the Project would result in any new or substantially more severe significant environmental impacts as compared to those disclosed in the circulated Draft EIR.

The supplementary information to the Draft EIR is indicated below under the respective EIR section heading, page number, paragraph, and the line within the referenced paragraph. Deletions are shown with ~~striketrough~~ and additions are shown with double underline. Existing text to remain unchanged is included as plain text, without strikethrough or double underlines, to provide context for the revisions, clarifications, and corrections.

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

Executive Summary

1. Pages ES-22 and ES-23, Table ES-1, Summary of Project Impacts, Project Design Features, and Mitigation Measures, is revised as follows:

**TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
<p>Threshold (a): Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?</p>	<p>TRAF-PDF-1: Transportation Demand Management (TDM) Program. The Applicant will implement a TDM Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking.</p> <p>(...)</p> <p>TRAF-PDF-2: Construction Traffic Management Plan. Prior to the issuance of a building permit for the Project, a detailed Construction <u>T</u>raffic Management Plan (<u>C</u>TMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The <u>C</u>TMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The <u>C</u>TMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City staff and other surrounding construction-related project representatives (i.e.,</p>	<p>No mitigation measures are required.</p>	<p>Less than Significant</p>

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	<p>construction contractors), whose projects will potentially be under construction at around the same time as the Project, will be conducted bimonthly, or as otherwise determined appropriate by City staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The C<u>T</u>MP will include, but not be limited to, the following elements as appropriate: (...)</p>		

Chapter II. Project Description

2. Page II-20, the first full paragraph is revised as follows:

Construction is anticipated to begin in 2021 with an estimated completion date in 2023, over an approximately 34-month construction period. The total soil excavated would be approximately 12,222 cubic yards (cy), all of which would be exported off-site. Construction hours would occur in accordance with the LAMC requirements, which prohibit construction between the hours of 9:00 p.m. and 7:00 a.m., Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday. Parking for construction workers would be provided on the Project Site or leased from nearby off-site parking areas. Shuttle service would also be provided for those construction workers who park in off-site parking areas. Project haul trucks (e.g., trucks hauling dirt) would be required to use City-approved haul truck routes. For haul trucks, several approved haul routes are available to and from the Project Site, depending on the location of the receiving landfills used to deposit materials. Landfills may include Sunshine Canyon, Chiquita Landfill, or other County or regional sites. If the landfill is accessed via I-10, one available outbound haul route is from the Project Site westbound via Wilshire Boulevard and southbound on South La Cienega Boulevard to the I-10 eastbound or westbound on-ramps. The inbound haul route would use the I-10 northbound or southbound off-ramps, northbound on South La Cienega Boulevard, and eastbound on Wilshire Boulevard to the

Project Site. Another inbound and/or outbound haul route would be northbound South San Vicente Boulevard, westbound on North Santa Monica Boulevard, and northbound or southbound on the I-405 on-ramps.

Chapter IV. Environmental Impact Analysis

Section IV.A, Air Quality

1. Page IV.A-54, fifth full paragraph, add the following footnote:

The results of the regional criteria pollutant emission calculations for VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} are presented in **Table IV.A-7, *Estimated Maximum Regional Operational Emissions (Pounds Per Day)***.^{89a}

^{89a} The total existing site regional air pollutant emission estimates accounted for the emissions associated with the 5,738 square foot Montessori Children's World School. However, the existing site regional air pollutant emissions are minor, even when including the emissions associated with the Montessori Children's World School in addition to the 8,225-square-foot Big 5 Sporting Goods store that would be removed. Therefore, impact determinations regarding air quality impacts would remain the same with or without the net reduction in emissions associated with the Montessori Children's World School.

2. Page IV.A-58, first full sentence, a footnote is added as follows:

The same assumptions, including compliance with the Title 24 Building Energy Efficiency Standards, CALGreen Code, and City of Los Angeles Green Building Code. The maximum daily localized emissions and the localized significance thresholds are presented in Table IV.A-9.^{90a}

^{90a} The total existing site regional air pollutant emission estimates accounted for the emissions associated with the 5,738 square foot Montessori Children's World School. However, the existing site regional air pollutant emissions are minor, even when including the emissions associated with the Montessori Children's World School in addition to the 8,225-square-foot Big 5 Sporting Goods store that would be removed. Therefore, impact determinations regarding air quality impacts would remain the same with or without the net reduction in emissions associated with the Montessori Children's World School.

Section IV.C, Energy

3. Page IV.C-20, the second sentence in the paragraph under subheading Transportation Energy is revised as follows:

During Project construction, on- and off-road vehicles would consume an estimated annual average of approximately 61,057 gallons of gasoline fuel and approximately 88,446 gallons of diesel over the approximately 34~~36~~ months of construction.

4. Page IV.C-22, the first full paragraph is revised as follows:

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, HVAC; refrigeration; lighting; and the use of electronics, equipment, and appliances. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in **Table IV.C-2, Summary of Annual Net New Energy Use During Project Operation**, the Project's annual net new energy demand would be approximately 2,337 MWh of electricity, ~~2,548,788~~2,508,892 cf of natural gas, ~~327,277~~288,321 gallons of gasoline, and ~~34,620~~30,623 gallons of diesel.

5. Page IV.C-22, first full paragraph, third sentence, add the following footnote:

As shown in **Table IV.C-2, Summary of Annual Net New Energy Use During Project Operation**, the Project's annual net new energy demand would be approximately 2,337 MWh of electricity, 2,548,788 cf of natural gas, 327,277 gallons of gasoline, and 34,620 gallons of diesel.^{43a}

^{43a} The total existing site energy consumption estimates accounted for the energy consumption associated with the 5,738 square foot Montessori Children's World School. However, the existing site energy consumption is minor, even when including the energy consumption associate with the Montessori Children's World School in addition to the 8,225-square-foot Big 5 Sporting Goods store that would be removed. Therefore, impact determinations regarding energy impacts would remain the same with or without the net reduction in energy consumption associated with the Montessori Children's World School.

6. Page IV.C-23, Table IV.C-2 is revised as follows:

TABLE IV.C-2
SUMMARY OF ANNUAL NET NEW ENERGY USE DURING PROJECT OPERATION^a

Energy Type	Annual Quantity ^{b,c}
Electricity	
<i>Existing Site</i>	(174 MWh)
Project	
Building Energy	2,191 MWh
Water Conveyance and Treatment	205 MWh
Electric Vehicle Charging	114 MWh
Project Subtotal	2,511 MWh
Total Net Electricity	2,337 MWh
Natural Gas	
<i>Existing Site</i>	(405,320,107,048 cf)
Project	
Building Energy	2,287,153 cf
Mobile Sources	366,955,328,788 cf
Project Subtotal	2,654,108,2,615,941 cf
Total Net Natural Gas	2,548,788,2,508,892 cf
Transportation	
Existing Site	
Gasoline	(28,645,30,581 gallons)
Diesel	(2,779,2,967 gallons)
Project	
Gasoline	355,922,318,902 gallons
Diesel	37,399,33,589 gallons
Total Net Transportation – Gasoline	327,277,288,321 gallons
Total Net Transportation – Diesel	34,620,30,623 gallons

MWh = megawatt-hours

cf = cubic feet

^a Detailed calculations are provided in Appendix E of this Draft EIR.

^b Totals may not add up due to rounding of decimals.

^c Negative values are denoted using parentheses.

SOURCE: ESA, 2020.

7. Page IV.C-24, the second and fourth paragraphs are revised as follows:

With compliance with 2019 Title 24 standards and applicable 2019 CALGreen requirements, at buildout, the Project is projected to generate a net increase in the on-site annual demand for natural gas totaling approximately ~~2,548,788~~2,508,892 cf, as shown in Table IV.C-2.

(...)

Based on the 2020 California Gas Report, the California Energy and Electric Utilities, a collective of California utility companies, estimates natural gas supplies within SoCalGas' planning area will be approximately 1,253,775,000,000 cf in 2023 (the Project's buildout year).⁵⁰ As stated above, the Project's annual net increase in demand for natural gas is estimated to be approximately ~~2,548,788~~2,508,892 cf. Therefore, the Project would account for approximately 0.0002 percent of the 2023 forecasted annual consumption in SoCalGas' planning area and would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth.

8. Page IV.C-25, the first full paragraph is revised as follows:

As reported in Table IV.C-2, the Project's estimated annual net increase in petroleum-based fuel usage would be approximately ~~327,277~~288,321 gallons of gasoline and ~~34,620~~30,623 gallons of diesel for the Project. Based on the CEC's *California Annual Retail Fuel Outlet Report*, Los Angeles County consumed 3,169,000,000 gallons of gasoline and 475,000,000 gallons of diesel in 2018.⁵³ The Project would account for ~~0.050~~0.01 percent of County gasoline consumption and ~~0.030~~0.006 percent of County diesel consumption based on the available County fuel sales data for the year 2018.

9. Page IV.C-26, last paragraph is revised as follows:

The Project's operational annual net new energy demand would be approximately 2,337 MWh of electricity, ~~2,548,788~~2,508,892 cf of natural gas, ~~327,277~~288,321 gallons of gasoline, and ~~34,620~~30,623 gallons of diesel. The Project would comply with applicable Title 24 and CALGreen Code standards aimed at reducing electricity and natural gas consumption. Further, the Project would be subject to Pavley standards, CAFE standards, and LCFS. The Project is located in an HQTAs and near a diverse set of land uses that would minimize travel and result in less use of transportation fuels.

10. Page IV.C-28, second full paragraph is revised as follows:

As stated above, at buildout, the Project would consume a net increase of ~~327,277~~288,321 gallons of gasoline and between ~~34,620~~30,623 gallons of diesel per year. For comparison purposes, the transportation-related fuel usage for the Project would represent between approximately ~~0.050~~0.01 percent of the 2018 annual on-road gasoline- and ~~between 0.030~~0.006 percent of the 2018 annual on-road diesel-related

energy consumption in Los Angeles County (based on the available County fuel sales data). Detailed calculations are shown in Appendix E of this Draft EIR. Operational transportation energy would be provided by existing retail service stations and no new retail service stations would be required. Transportation fuels (gasoline and diesel) are produced from crude oil, which can be produced from domestic supplies or imported from various regions around the world and, based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.⁵⁸ As such, existing and planned transportation fuel supplies would be sufficient to serve the Project's demand.

11. Page IV.C-38, first paragraph under subheading Transportation Energy is revised as follows:

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the State and region. As described above, the Project would consume a total net increase of approximately ~~327,277,288,321~~ gallons of gasoline and approximately ~~34,620,30,623~~ gallons of diesel per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately ~~0.050,01~~ percent of the 2018 annual on-road gasoline- and ~~0.030,006~~ percent of the annual on-road diesel-related energy consumption in Los Angeles County (based on the available County fuel sales data), as shown in Appendix E of this Draft EIR.

Section IV.E, Greenhouse Gas Emissions

1. Page IV.E-74, last full paragraph, last sentence add the following footnote as follows:

The Project's total and net GHG emissions from operation of the Project are shown in **Table IV.E-8, *Estimated Unmitigated Operational Greenhouse Gas Emissions***.^{161a}

^{161a} The total existing site GHG emissions estimates accounted for the emissions associated with the 5,738 square foot Montessori Children's World School. However, the existing site GHG emissions are very minor, even when including the emissions associate with the Montessori Children's World School in addition to the 8,225-square-foot Big 5 Sporting Goods store that would be removed. Therefore, impact determinations regarding GHG impacts would remain the same with or without the net reduction in emissions associated with the Montessori Children's World School. Furthermore, the Project by itself would be consistent with the applicable GHG plans, policies, and regulations as evaluated herein and this determination would not change based on whether or not the net reduction in emissions associated with the Montessori Children's World School is considered.

Section IV.G, Noise

1. Page IV.G-41, second paragraph, last sentence is revised as follows:

Another inbound and/or outbound haul route would be northbound South San Vicente Boulevard, westbound on North Santa Monica Boulevard, and northbound or southbound on the I-405 freeway on-ramps.

Section IV.I, Transportation

1. Page IV.I-24, TRAF-PDF-2 is revised as follows:
 - **TRAF-PDF-2: Construction Traffic Management Plan.** Prior to the issuance of a building permit for the Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The CTMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City staff and other surrounding construction-related project representatives (i.e., construction contractors), whose projects will potentially be under construction at around the same time as the Project, will be conducted bimonthly, or as otherwise determined appropriate by City staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The CTMP will include, but not be limited to, the following elements as appropriate:

Appendices

Appendix J-1, Traffic Assessment

1. Page 83, the first sentence of the first paragraph is revised as follows:

The Project is anticipated to be constructed over a 2434-month period, with completion anticipated in Year 2023.

2. Effects of Corrections and Revisions

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

New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to

comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. 'Significant new information' requiring recirculation includes, for example, a disclosure showing that:

- *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
- *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.*
- *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.*
- *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*

CEQA Guidelines Section 15088.5 also provides that “[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

The information contained in this chapter 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 by the discussion below, the revisions, clarifications, and corrections to the Draft EIR would not result in a new significant impact or increase any impact already identified in the Draft EIR.

Executive Summary

With respect to additions and corrections to the **Executive Summary**, the revisions involve a clarification to consistently use a similar acronym in the project design feature language as with the rest of the Draft EIR. These clarifications do not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact, a change in project alternative or mitigation measure, nor do they indicate that the Draft EIR was inadequate and conclusory.

Chapter II. Project Description

With respect to additions and corrections to **Chapter II, *Project Description***, the revisions involve a description of the anticipated haul route as described in **Section IV.G, *Noise***, of the Draft EIR. These clarifications do not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact, a change in project alternative or mitigation measure, nor do they indicate that the Draft EIR was inadequate and conclusory.

Chapter IV. Environmental Impact Analysis

Section IV.A, Air Quality

With respect to additions and corrections to **Section IV.A, *Air Quality***, the revisions involve a clarification regarding the methodology related to existing uses. This clarification does not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact, a change in project alternative or mitigation measure, nor does it indicate that the Draft EIR was inadequate and conclusory.

Section IV.C, Energy

With respect to additions and corrections to **Section IV.C, *Energy***, the revisions involve a typographical error on the construction duration, updates to operational energy consumption related to natural gas and transportation energy to match the calculations provided in Appendix E of the Draft EIR, and a clarification regarding the methodology related to existing uses. The updates made to the operational energy consumption reduce the natural gas and transportation energy consumed by the Project during operation. These clarifications do not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact, a change in project alternative or mitigation measure, nor do they indicate that the Draft EIR was inadequate and conclusory.

Section IV.E, Greenhouse Gas Emissions

With respect to additions and corrections to **Section IV.E, *Greenhouse Gas Emissions***, the revisions involve a clarification regarding the methodology related to existing uses. This clarification does not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact, a change in project alternative or mitigation measure, nor does it indicate that the Draft EIR was inadequate and conclusory.

Section IV.G, Noise

With respect to additions and corrections to **Section IV.G, *Noise***, the revisions involve a clarification to a typographical error. These clarifications do not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact,

a change in project alternative or mitigation measure, nor do they indicate that the Draft EIR was inadequate and conclusory.

Section IV.I, Transportation

With respect to additions and corrections to **Section IV.I, *Transportation***, the revisions involve a clarification to consistently use a similar acronym in the project design feature language as with the rest of the Draft EIR. These clarifications do not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact, a change in project alternative or mitigation measure, nor do they indicate that the Draft EIR was inadequate and conclusory.

Appendices

Appendix J-1, Traffic Assessment

With respect to additions and corrections to Appendix J-1, the revisions involve a typographical error on the construction duration. This clarification does not result in a new significant environmental impact, a substantial increase in the severity of an environmental impact, a change in project alternative or mitigation measure, nor do they indicate that the Draft EIR was inadequate and conclusory.