

Section 5.0 | Corrections and Additions

This section of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the proposed Project. Such changes are 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. The changes described in this section do not result in any new or increased significant environmental impacts that would result from the proposed Project. This section is divided into three parts: Section 5.1, General Corrections and Additions to the Draft EIR; Section 5.2, Corrections and Additions to Draft EIR Sections and Appendices; and Section 5.3, Effect of Corrections and Additions.

5.1 GENERAL CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

5.1.1 Metro’s Regional Connector

Subsequent to the release of the Draft EIR, Metro’s Regional Connector opened on June 16, 2023.¹ The Regional Connector extends the Metro light-rail system to connect the Little Tokyo/Arts District Station to the 7th Street/Metro Center Station through the development of three new stations at 1st Street and Central Avenue (Little Tokyo/Arts District Station), 2nd Street and Broadway (Historic Broadway Station), and 2nd Place and Hope Street (Grand Avenue/Bunker Hill Station). This project improves regional access by providing a direct connection between each end of the light rail system (Azusa to Long Beach and East Los Angeles to Santa Monica). As discussed in Section 5.2.17, Transportation, of Section 5.0, Other CEQA Considerations, of the Draft EIR, with the opening of the Regional Connector, passengers will no longer need to transfer at Los Angeles Union Station and are expected to experience reduced travel times.

5.1.2 Metro L Line (Gold) Name Change

Subsequent to the release of the Draft EIR, on June 16, 2023, in connection with the opening of Metro’s Regional Connector, Metro changed the name of the L Line (Gold). The part of the former L Line (Gold) between Little Tokyo/Arts District Station and APU/Citrus College station became part of the A Line (Blue), and the part of the former L Line (Gold) between Little Tokyo/Arts District Station and Atlantic Station became part of the E Line (Gold).² The proposed Project area includes the part of the former L Line (Gold) that is now part of the A Line (Blue). References in the Draft EIR and this Final EIR to the L Line (Gold) refer to the A Line (Blue).

5.1.3 Downtown Community Plan

The City of Los Angeles’ Land Use Element is comprised of 35 Community Plans, which establish neighborhood-specific goals and implementation strategies to achieve the broad objectives laid out in the City of Los Angeles General Plan. The proposed Project alignment is located within the boundaries of the

¹ Los Angeles County Metropolitan Transportation Authority. 2023. Free rides across the Metro system this weekend to celebrate the debut of the new A and E Lines, 3 new stations and the opening of the Regional Connector. Available at: <https://thesource.metro.net/2023/06/13/free-rides-across-the-metro-system-this-weekend-to-celebrate-the-debut-of-the-new-a-and-e-lines-3-new-stations-and-the-opening-of-the-regional-connector/>. Accessed September 2023.

² Los Angeles County Metropolitan Transportation Authority. 2023. Free rides across the Metro system this weekend to celebrate the debut of the new A and E Lines, 3 new stations and the opening of the Regional Connector. Available at: <https://thesource.metro.net/2023/06/13/free-rides-across-the-metro-system-this-weekend-to-celebrate-the-debut-of-the-new-a-and-e-lines-3-new-stations-and-the-opening-of-the-regional-connector/>. Accessed September 2023.

Central City Community Plan Area, Central City North Community Plan Area, and the Silver Lake-Echo Park-Elysian Valley Community Plan Area.

The Draft EIR’s Regulatory Setting included an overview of DTLA 2040. As discussed in Sections 3.1.1, 3.3.1, 3.4.1, 3.6.1, 3.8.1, 3.11.1, 3.14.1, 3.16.1, Regulatory Setting, of the Draft EIR, “The City is currently working on an update to the Downtown Community Plan, known as DTLA 2040, which would consolidate the Central City Community Plan and Central City North Community Plan areas. Because it is unknown when the new community plan would be adopted and its EIR certified, the analysis in this section is based on the current applicable” plans and/or land use and zoning designations. As discussed in Sections 3.5.1, 3.9.1, 3.15.1, and 3.19.1, Regulatory Setting, of the Draft EIR, “The City of Los Angeles is currently in the process of updating the Central City and Central City North Community Plans through the Downtown Los Angeles 2040 Draft Community Plan. Because it is unknown when the new community plan would be adopted and its EIR certified, the analysis in this section is based on the current applicable plans.” As discussed in Section 3.17.1, Regulatory Setting, of the Draft EIR, “The City is currently working on an update to the Downtown Community Plan, known as DTLA 2040, which would consolidate the Central City Community Plan and Central City North Community Plan areas. The proposed DTLA 2040 Community Plan includes land use designation and zoning changes, as well as street network and circulation changes. The transportation model forecast for the proposed DTLA 2040 Community Plan using the City of Los Angeles travel mode is used in the forecast of future conditions for the Project study area, as it represents the most current detail for what is expected in the future.”

On May 3, 2023, following the circulation of the Draft EIR for public review, the Los Angeles City Council approved DTLA 2040, and the comprehensive update to the City of Los Angeles Zoning Code for the DTLA 2040 area. Following this approval, the City has entered the implementation phase for DTLA 2040, and implementing ordinances will be reviewed and finalized by the City Attorney, to ensure clarity of regulations and consistency with state law, which the City has indicated can take approximately six months to a year.³ After this implementation process is complete, DTLA 2040 and the new Zoning Code will be brought into effect by the City Council, and accordingly the Plan and new Zoning Code are not currently in effect and it is unknown whether they would be in effect at the time the proposed Project’s EIR is certified. Accordingly, the analysis in this EIR is based on the current applicable land use and zoning designations. An overview of the proposed Project’s consistency with the DTLA 2040 plan’s key applicable principles, goals, and policies is provided below for informational purposes.

One of DTLA 2040’s guiding principles is to “promote a transit, bicycle, and pedestrian-friendly environment,” by “expanding transit service,” and “improving connectivity” Downtown. (DTLA 2040, Chapter 1, p. 10.) The proposed Project is consistent with this guiding principle, and would “expand transit service” by creating new and improving existing connections not only to communities along the Project alignment, but also to other area transit lines and stations, including the regional transit lines served by LAUS, the Chinatown Metro L Line (Gold) station, and several regional and local bus lines serving the Project Study Area. In addition, the proposed Project would be ADA accessible and compliant. The cabins allow for wheelchairs, bicycles, and strollers, and easy entry and exit for passengers connecting to and

³ See City of Los Angeles Department of City Planning. 2023. Downtown Los Angeles Community Plan Update. Available at: <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about>. Accessed August 2023.

from other modes of transit. The proposed Project’s compatibility with bicycles would also support “bike infrastructure.” (DTLA 2040, Chapter 1, p. 11.)

Further, Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year. The vast majority of visitors drive their personal vehicles to access the venue. These vehicles create congestion on the surface streets leading up to and around the Stadium, including Sunset Boulevard/Cesar E. Chavez from LAUS and throughout the surrounding communities. As such, the proposed Project would enhance pedestrian safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area, thus promoting a “pedestrian-friendly environment.” Additionally, the proposed Project would include a number of pedestrian enhancements and mobility hubs that would provide new multi-modal connection options. For example, the proposed Project is designed to be consistent with Metro’s LAUS Forecourt and Esplanade Improvements Project, which involves repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space, as well as pedestrian and bicycle enhancements along Alameda Street and Los Angeles Street. In addition, the proposed Project proposes a new pedestrian plaza at El Pueblo north of the Placita de Dolores. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing pedestrian access to both LAUS and El Pueblo. In addition, both the Chinatown/State Park Station and Dodger Stadium Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements at the Chinatown/State Park Station would include pedestrian improvements between Metro’s L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. The Dodger Stadium Station would provide pedestrian network improvements around the station, including repaving pedestrian paths through the Dodger Stadium parking lot to channelize and provide a safe connection for pedestrians traveling between the station and the stadium. Accordingly, the proposed Project is consistent with DTLA 2040’s guiding principles.

The proposed Project is also consistent with Downtown-wide goals and policies outlined in DTLA 2040 that seek to support sustainable transportation options. Policy LU 1.1 seeks to “ensure the development of complete neighborhoods with diverse uses and resilient infrastructure, parks, streetscapes, transit, and community amenities.” (DTLA 2040, Chapter 2, p. 18.) The proposed Project would enhance community connectivity to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park, and provide pedestrian enhancements in the areas surrounding the proposed Project’s stations, thus providing community amenities and access to parks. In addition, through collaboration with State Parks, the proposed Project has been designed to provide additional benefits to the Los Angeles State Historic Park, including pedestrian improvements between Metro’s L Line (Gold) and the park, and integration of the Chinatown/State Park Station into the southern boundary of the park with hardscape and landscape enhancements, a mobility hub, and other park amenities including concessions, restrooms, and a breezeway connecting the concessions and restrooms. Further, the proposed Project would operate daily to serve existing residents, workers, park users, and visitors to Los Angeles, thus providing transit in furtherance of “complete neighborhoods.”

DTLA 2040 Policy LU 17.9 calls for the Plan to “support local, regional, state, and federal programs seeking to reduce greenhouse gas emissions, in an effort to minimize pollution sources and to improve air quality.” As a zero-emission project, the proposed Project is consistent with these aims. The proposed Project would operate at zero emissions, with the electrical power for the proposed Project supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility’s Green Power Program, as discussed in GHG-PDF-A. Further, the proposed Project’s backup power would be provided by battery storage located at each station and tower and the non-passenger junction. The proposed Project’s ability to reduce vehicular travel, to improve air quality through reduced emissions, and to reduce greenhouse gases through reduced vehicular travel are discussed in Section 3.3, Air Quality, Section 3.8, Greenhouse Gas Emissions, Section 3.17, Transportation, Appendix D, Air Quality/Health Risk Assessment Technical Report, Appendix J, Greenhouse Gas Emissions Technical Report, and Appendix N, Transportation Appendices. The proposed Project would improve mobility and accessibility for the region by connecting LAUS to Dodger Stadium via an aerial gondola system, including an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. In addition, given the capacity of this system, approximately 20 percent of Dodger fans could take aerial transit connected to Metro’s regional transit system. This would reduce vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days, thereby reducing VMT and GHG emissions. Accordingly, the proposed Project would result in air quality benefits to the surrounding communities. The lifetime emissions of the proposed Project over its useful life would be a reduction of 166,653 MT CO₂e. The lifetime VMT reduction of the proposed Project would be a reduction of 129,629,500 VMT. Emissions are decreased through reducing vehicle miles traveled. The proposed Project would result in a net reduction in criteria pollutant emissions by reducing vehicle miles traveled. Therefore, the proposed Project is consistent with Policy LU 17.9’s aim of supporting efforts to reduce GHG emissions and improve air quality.

Other neighborhood policies are aimed at improving transit connections. (See, e.g., LU Policy 49.4, DTLA 2040, Chapter 2, p. 47 [“Enhance the public realm and improve transit connections to neighboring places.”].) The proposed Project would facilitate these policies by providing an additional transit option in Downtown. For instance, the proposed Project would provide new transit and pedestrian connections to and between currently underserved neighborhoods and uses along the proposed alignment, including Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, Echo Park, and Solano Canyon. As such, the proposed Project would enhance community connectivity and improve transit connections by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park.

With respect to El Pueblo, DTLA 2040 Policy LU 53.11 seeks to “provide[] clear access to the historic district,” while Policy LU 53.12 looks to “encourage more active nighttime uses.” (DTLA 2040, Chapter 2, p. 49.) The proposed Project would provide a connection to and from El Pueblo via Alameda Station, providing new and enhanced connections from the El Pueblo area with downtown areas including LAUS, Dodger Stadium, the Chinatown/State Park and other local transit lines along the proposed Project alignment and the regional transit system. The proposed Project’s new pedestrian plaza at El Pueblo is consistent with Policy LU 53.11 as it creates a new, identifiable pedestrian entry point to El Pueblo in an area that currently contains a parking and loading area for El Pueblo. The proposed Project is consistent with Policy LU 53.12 as it would provide a link to El Pueblo before and after Dodger games, thus supplying

additional visitors to the El Pueblo and incentivizing nighttime uses to capture these visitors. Therefore, the proposed Project is consistent with these policies.

Further, the proposed Project is consistent with policies aimed at assisting businesses. For example, Policy LU 7.10 seeks to “support existing neighborhood stores (i.e., mom-and-pop shops that support the needs of local residents, are culturally relevant, and create a stable economic environment,”) and Policy LU 6.2 seeks to “promote a pluralistic economy by supporting dynamic partnerships among local academic institutions, government, businesses, and nonprofit organizations.” (DTLA 2040, Chapter 2, pp. 22-23.) Similarly, Policy LU 42.10 aims to “[s]upport and reinforce the historic and cultural components of Chinatown, including architectural design, and the long-standing local businesses and legacy institutions that serve the local community.” (*Id.*, p. 44.) The Project Sponsor, LA Aerial Rapid Transit Technologies LLC, was donated in 2023 to Zero Emissions Transit, a nonprofit organization dedicated to supporting zero emissions transportation programs, policies, and projects, such as the proposed Project. In addition to providing accessible and affordable mobility options for these businesses’ employees and area residents, the proposed Project would create economic opportunities for potential partnerships with these businesses, consistent with the policies aimed at fostering partnerships between businesses and nonprofit organizations. The proposed Project could partner, for example, with the Olvera Street Merchants to help in addressing visitor, educational, and customer access to these businesses, consistent with the policy of supporting existing neighborhood stores. The proposed Project includes other features to enhance and provide additional benefit to the surrounding community, including but not limited to the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. In addition, to reflect the diversity of Los Angeles, the Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. Therefore, the proposed Project is consistent with the goals and policies aimed at supporting businesses.

The proposed Project is also consistent with DTLA 2040 goals and policies related to public art. For example, Policy LU 15.6 looks to “Encourage new development to incorporate culturally relevant and community-driven public art along building facades and in outdoor areas.” (DTLA 2040 Chapter 2, p. 27.) Each station, including Alameda Station, would provide an opportunity for site specific artwork that is reflective of the unique neighborhood culture that could be commissioned from local artists. Therefore, the proposed Project would be consistent with this policy.

In addition, the proposed Project is consistent with DTLA 2040’s goals and policies concerning mobility and connectivity. Policy MC 2.5 seeks to “[f]acilitate integration between different modes of travel to create a seamless experience as users switch between modes and to promote transit use and active transportation.” (DTLA 2040, Chapter 3, p. 52.) Goal 4 looks to provide a “safe and integrated bicycle network that provides access to transit and key destinations.” (*Id.*, p. 53.) The proposed Project’s cabins will be large enough to accommodate bicycles, and the proposed Project (an aerial rapid transit system) would connect to the region’s public transportation hub at LAUS. The proposed Project would also provide mobility hubs at both the Chinatown/State Park Station and Dodger Stadium Station for passengers to be able to access a suite of first and last mile multi-modal options, including a bike share program and individual bike lockers, facilitating connections to parks and adjacent neighborhoods.

Accordingly, the proposed Project would “facilitate integration between different modes of travel,” and further the City’s bicycle network. For the same reasons, the proposed Project would be consistent with Policy MC 4.4, which aims to “[f]acilitate the integration of bikes on transit to improve first-last mile connections,” (*id.*, p. 55) and would support the Draft Plan’s ability to engage in Metro’s “First-mile, Last-mile” program, which provides “implementing improvements for first and last mile (FLM) portion[s] of an individual’s trip, and provides a vision for addressing FLM improvements in a systematic way.” (*Id.*, p. 72.) Therefore, the proposed Project is consistent with DTLA 2040’s goals and policies related to mobility and connectivity.

Therefore, the proposed Project would be consistent with DTLA 2040’s principles, goals, and policies.

5.1.4 Mobility Hub at Dodger Stadium

Section 2.0, Project Description, of the Draft EIR, stated that the Project Sponsor will request consideration by the Los Angeles Dodgers of the potential for Dodger Stadium Station to potentially include a mobility hub where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. Issues to be addressed in connection with a potential mobility hub could include maintaining security for Dodger Stadium and the surrounding surface parking areas. In response to comments on the Draft EIR and after further coordination with the Los Angeles Dodgers, the proposed Project would provide a mobility hub at the Dodger Stadium property to provide connectivity to Elysian Park and the surrounding communities. Outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for Dodger Stadium and the surrounding surface parking areas.

Accordingly, all references to “potential” or “potentially” when discussing the mobility hub at Dodger Stadium Station should be considered stricken (e.g., ~~potential~~ mobility hub at Dodger Stadium Station).

5.1.5 Additional Separation Buffer

Comments on the Draft EIR requested additional information on the Additional Separation Buffer described in Section 2.0, Project Description, of the Draft EIR and analyzed as part of the proposed Project in Section 3.0, Environmental Analysis, of the Draft EIR. As discussed in Appendix N, Additional Separation Buffer, of this Final EIR, based on the current design, the Additional Separation Buffer is estimated to be approximately 10 feet on each side of the required aerial clearance width based on applicable standards, requirements, building codes, and guidelines. The proposed Project’s Additional Separation Buffer would comply with applicable standards, requirements, building codes, and guidelines as determined by the City of Los Angeles and Metro. The final width of the Additional Separation Buffer would be determined by the appropriate agencies during the permitting process for the proposed Project. Nevertheless, for informational purposes, the estimated square footage of the Additional Separation Buffer is provided in Appendix O, Supplemental Graphics of Proposed Alignment Plan and Profile, in the Final EIR.

5.1.6 LADWP Service Letter

On October 5, 2023, the Los Angeles Department of Water and Power (LADWP) issued a response letter detailing LADWP's ability to provide water and electric services for the proposed Project. LADWP's response letter indicates that it would be able to provide the water service for the domestic needs for the proposed Project. In addition, LADWP's renewable electricity portfolio would be able to accommodate the proposed Project's demand for electricity, including through the purchase of power under the LADWP Green Power Program. A small portion (i.e., less than 0.5 percent) of the proposed Project's electricity usage would be related to the Los Angeles State Historic Park's operation of park amenities at the Chinatown/State Park Station, which would be operated by the Los Angeles State Historic Park. This electricity would be supplied by LADWP's standard electricity portfolio.

5.1.7 Senate Bill 44 Extension | Senate Bill 91

Subsequent to the release of the Draft EIR, on October 10, 2023, Governor Newsom approved Senate Bill 91 (SB 91), extending CEQA streamlining provisions for "environmental leadership transit projects" previously provided under Senate Bill 44 and codified in Public Resources Code section 21168.6.9. SB 91 contains the same substantive provisions as SB 44. References in the Draft EIR and this Final EIR to SB 44 also refer to SB 91.

5.1.8 Aesthetics

Analysis of Supplemental KOPs in Response to Comments

Section 3.01, Aesthetics, and Appendix C, Visual Impact Assessment, of the Draft EIR, include a detailed discussion of the aesthetic impacts of the proposed Project, which would be less than significant. Key Observation Points (KOPs) critical or representative of the visual character of the area were identified within each Landscape Unit (LU) and utilized for before and after photorealistic and true to scale visual simulations and locations of sensitive viewers that potentially would be visually impacted by the proposed Project. KOPs within each LU were selected based on existing knowledge of important viewsheds and through consultation with responsible agencies. Visual simulations were created to reflect the proposed Project components within the existing landscape and, as such, include the existing landscape planting, buildings, and other visual elements such as open space resources, trees, and building frontages as they existed at the time the photos were taken. Refer to Appendix C, Visual Impact Assessment, for detailed discussion about the implementation and results of the visual simulation.

In response to comments on the Draft EIR, supplemental and additional KOPs were prepared, including simulations provided for additional clarity regarding certain design elements of the proposed Project. Refer to Appendix H.2, Supplemental KOPs in Response to Comments, for the additional visual simulations of the proposed Project. Refer to Appendix H.1, Memo Regarding Preparation of View Simulations, of the Final EIR, for a discussion of how the view simulations were prepared.

The supplemental KOPs were updated to clarify the following design elements of the proposed Project:

- Maximum Operating Capacity. KOPs were updated to depict the system operating at maximum capacity, including passengers within the cabins. At maximum capacity and during peak operations, outside of the station the cabins would be spaced approximately 450 feet apart.

- Signage Program. KOPs were updated to incorporate the proposed Project’s signage program, as depicted in the Sign Concept Plan, included as Appendix B to the Lighting Study, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR.
- Ropeway Cables | Slack Carriers. KOPs were updated to clarify the dimensions and spacing of the ropeway cables, as well as spacing of the slack carriers that maintain clearance between the three ropes that comprise the ropeway. The proposed Project’s ropes would be 1.75 to 2.5 inches in diameter. As 1.75 to 2.5 inches in diameter is too small to be visually detectable in many of the Draft EIR KOP, except as noted, the supplemental KOPs depict ropes modeled with a 6-inch diameter to make them more noticeable. Updates were also made to KOPs where it appeared that only two ropes were visible instead of three. Slack carriers in the ropeway were also incorporated and are spaced 350 feet apart. Slack carriers are devices that support and maintain proper separation between the cables of a 3S system. Slack carriers are attached to the system’s two stationary cables (the “track ropes”) and provide support sheaves for the third cable that circulates continuously around the system (the “haul rope”). The proposed Project would utilize slack carriers. While the exact quantity and location of the slack carriers along the track ropes would be determined during the design phases of the proposed Project, it is anticipated that slack carriers would be placed approximately every 350 to 500 feet with adequate separation from the stations, junction, and towers. The slack carriers of one gondola lane can be staggered from or aligned with the adjacent lane. However, as mentioned above, KOPs were updated to depict the slack carriers spaced at 350 feet apart, to present the most conservative scenario.

All KOPs from the Draft EIR are included in Appendix H.2 of the Final EIR. Those that were updated as described above are: KOP 4, KOP 5, KOP 7a, KOP 7b, KOP 8, KOP 9, KOP 10, KOP 11, KOP 12, KOP 13, KOP 14, KOP 15a, KOP 15b, KOP 16a, KOP 16b, KOP 17, KOP 18, KOP 19, KOP 22, KOP 23, KOP 24, KOP 25, KOP 27, KOP 28a, KOP 29.

In addition, in response to comments on the Draft EIR, additional visual simulations of the proposed Project were provided in Appendix H.2 as follows:

- Additional Views of Los Angeles State Historic Park: KOPs 31 through 35 provide additional visual simulations of Los Angeles State Historic Park, including views from a cabin over the Park, and additional views of the Chinatown/State Park Station and proposed Park amenities.
- Additional Views of Alameda Tower and Alpine Tower: KOPs 36 and 37 provide additional views of the locations of the proposed Alameda Tower and Alpine Tower.

As discussed below, the evaluation of updated and additional KOPs for the proposed Project does not result in significant impacts, and the aesthetic impacts of the proposed Project would be less than significant.

Regarding scenic vistas, as analyzed in the Draft EIR, there are no designated scenic vistas present in the area of potential impact (API). However, the Project area provides views that are considered scenic by certain viewers, including views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains. The proposed Project would not significantly block scenic or panoramic views. The simulated views of the proposed Project as shown in

supplemental KOPs illustrate that views considered to be scenic locally would not be substantially impacted. In addition, views from the Los Angeles State Historic Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views. While minor design elements of the KOPs have been updated, the proposed Project alignment, station, junction, and tower locations, height, massing, and overall design have not changed. Therefore, the proposed Project would not substantially affect scenic vistas, and impacts would be less than significant.

Similarly, regarding scenic resources, as analyzed in the Draft EIR, no State- or County-designated scenic highways or eligible State scenic highways are located in the Project area. The Arroyo Seco Parkway/SR-110, is located within the Project area and is a National Scenic Byway and a California Historic Parkway. However, the Arroyo Seco Parkway/SR-110 is not a State scenic highway. As concluded in the Draft EIR, the proposed Stadium Tower, as well as cables and cabins, would be visible to motorists on Arroyo Seco Parkway/SR-110 both on the northbound and southbound sides. However, the proposed Project would not damage any scenic resources within a State scenic highway, as the Arroyo Seco Parkway/SR-110 is not a designated State scenic highway. While minor design elements of the supplemental KOPs have been updated, the proposed Project alignment, station, junction, and tower locations, height, massing, and overall design have not changed, and no new scenic highways exist in the Project area. As such, the proposed Project would not substantially damage scenic resources with a State scenic highway, and no impact would occur.

Since the proposed Project is in an urbanized area, the proposed Project was analyzed for its potential to conflict with applicable zoning and other regulations governing scenic quality, in accordance with State CEQA Guidelines Appendix G. As concluded in the Draft EIR, the proposed Project would represent an overall change in views and visual quality and character as compared to existing conditions. However, the proposed Project is in an urban area that currently has a mix of architectural styles and building materials and colors. Although viewer groups may have varying sensitivities to the visual change associated with the proposed Project, the Draft EIR concluded that the proposed Project would be consistent with applicable zoning and other regulations governing scenic quality and the operation of the proposed Project would have less than significant impacts related to visual character and quality. The addition of design elements in the supplemental KOPs such as ropes, slack carriers, and signage, as well as depicting the system operating at maximum capacity, including passengers within the cabins, represent minor changes to the KOPs. The proposed Project alignment, station, junction, and tower locations, height, massing, and overall design have not changed. In addition, the proposed Project's cables, provided at a larger scale in the simulations to be visible, would have similar characteristics to the overhead power lines that are prevalent in views in the area. Further, as discussed in Appendix C, Visual Impact Assessment, to the Draft EIR, and shown in the supplemental KOPs included in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, there is existing signage in the Project area, and the proposed Project signage would not substantially degrade the existing visual character or quality of public views. Instead, the proposed Project's design ensures that signage would enhance the public realm. Specifically, signage for the proposed Project would be architecturally integrated into the design of the ART system, including its stations, the junction, towers, and cabins, and would be designed consistent with applicable Metro, City, and State approval requirements. In addition, consistent with the City's Framework Element Chapter 5 Urban Form and Neighborhood Design Policy 5.8.4, signage would also be designed to be

integrated with the architectural character of the surrounding buildings to convey a visually attractive character. Further, as illustrated in Appendix H.2 Supplemental KOPs in Response to Comments, of the Final EIR, the type and extent of proposed signage would emphasize the transit use of the proposed Project and would complement the existing and approved signage environment along the proposed Project alignment. The proposed Project's signage would create a uniform visual identity that would connect the entire proposed Project alignment. Overall, as discussed in Section 3.0, Aesthetics, of the Draft EIR, and as further substantiated by the updated and additional KOPs included in Appendix H.2, Supplemental KOPs in Response to Comments, of the Final EIR, the proposed Project would not conflict with applicable zoning or other regulations governing scenic quality. Therefore, the proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and the impact would be less than significant.

Regarding light and glare, the Lighting Study for the proposed Project, which is included in Appendix C, Visual Impact Assessment, of the Draft EIR, was conducted to determine the potential environmental impacts resulting from the proposed Project's lighting and illuminated signage program. Based on the analysis in the Lighting Study, the Draft EIR concluded that the proposed Project would not create a substantial source of light or glare that would result in adverse effects to day/nighttime views of the area and would comply with applicable City regulations related to light and glare. Therefore, impacts were determined to be less than significant. While the additional and supplemental KOPs were updated to incorporate all elements of the proposed Project's signage program, impacts to light and glare associated with the proposed signage as depicted in the Sign Concept Plan, were included and comprehensively analyzed within the Draft EIR and associated Appendix C, Visual Impact Assessment. The updated KOPs are illustrative in nature, and do not represent new or additional signage that could result in new or more severe potential impacts to light or glare. Therefore, impacts to light and glare would be less than significant.

Regarding shading, while minor design elements of the supplemental KOPs have been updated, the proposed Project alignment, station, junction, and tower locations, height, massing, and overall design have not changed. As such, there are no changes to the shading analysis and impacts related to shading would be less than significant.

5.1.9 Biological Resources

CDFW Recommended PDFs

The California Department of Fish and Wildlife ("CDFW") submitted a comment letter on the Draft EIR (Comment S1) and made certain recommendations regarding biological resources. Following consultation with CDFW, additional Project Design Features were incorporated to provide additional environmental benefits regarding biological resources, as discussed in Section 3.04, Biological Resources, of the Draft EIR. The proposed Project would result in less than significant construction impacts with mitigation, and less than significant operational impacts with respect to biological resources. Additions to the Draft EIR have been provided for Section 3.04, Biological Resources to add these Project commitments as enforceable Project Design Features, BIO-PDF-B, BIO-PDF-C, BIO-PDF-D, BIO-PDF-E, BIO-PDF-F, BIO-PDF-G, and BIO-PDF-H.

Updated Tree Report

Carlberg Associates prepared an inventory of trees located at the proposed locations of the proposed Project's stations, junction, and towers, inclusive of the component's construction zone and where trees along the alignment may interfere with the proposed ropeway and cabins (the "Tree Inventory Report"). This Tree Inventory Report was included as Appendix B to Appendix E, Biological Resources Assessment, of the Draft EIR.

In response to comments on the Draft EIR, the Tree Inventory Report prepared for the proposed Project has been updated to clarify the criteria for inclusion in the report's inventory. The updated Tree Inventory Report is included as Appendix K.1 of the Final EIR. The update clarifies that City of Los Angeles right-of-way trees are inventoried regardless of trunk size. The updated report also clarifies trees within the Los Angeles State Historic Park, including those under the alignment that could potentially interfere with required cabin and ropeway clearances (i.e., those that would or could encroach within 5 feet of the bottom of the cabin and within 50 feet from the centerline of the proposed Project's ropeway). The report was also updated to add a note clarifying the City of Los Angeles' Tree Preservation Ordinance requirements for measuring the diameter of multi-stemmed trees, and the report was updated to use this counting methodology, resulting in an additional 25 "significant" trees inventoried. In addition, certain counting errors were remedied, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as the original Tree Inventory Report. The original and updated Tree Inventory Reports reflect the conditions at the time of Carlberg Associate's survey.

Additional March 23, 2023 Biological Resources Survey

As discussed in Section 3.04, Biological Resources, and Appendix E, Biological Resources Assessment, of the Draft EIR, two field surveys of the proposed Project alignments were conducted on April 1, 2020, and April 24, 2021, to evaluate existing biological resources. In response to comments on the Draft EIR, a third survey was performed on March 23, 2023, to provide an updated habitat assessment for sensitive species and a supplementary wildlife survey effort.

5.1.10 Cultural Resources

Mitigation Measures CUL-A, CUL-C, and CUL-D

As discussed in Section 3.05, Cultural Resources, of the Draft EIR, the proposed Project would result in potentially significant impacts to archaeological resources. Accordingly, the proposed Project would implement mitigation measures in order to reduce such impacts to less than significant. Where a project would result in potentially significant impacts to archaeological resources, CEQA Guidelines section 15126.4(b) recognizes that "preservation in place is the preferred manner of mitigating impacts to archaeological sites," and that data recovery plans may be prepared "[w]hen data recovery through excavation is the only feasible mitigation." Mitigation Measures CUL-A, CUL-C, and CUL-D have been revised consistent with CEQA Guidelines section 15126.4(b).

5.1.11 Greenhouse Gas Emissions

GHG-PDF-A

As described in Sections 2.0, Project Description, and 3.08, Greenhouse Gas Emissions, of the Draft EIR, the proposed Project voluntarily committed to use electricity supplied from LADWP's Green Power Program to further demonstrate the proposed Project's leadership towards sustainable transportation. In response to comments suggesting that this commitment is illusory, an addition to the Draft EIR has been provided for Section 3.08, Greenhouse Gas Emissions, to add this Project commitment as an enforceable Project Design Feature, GHG-PDF-A.

5.1.12 Hazards and Hazardous Materials

MM-HAZ-A

As discussed in Section 3.09, Hazards and Hazardous Materials, of the Draft EIR, the proposed Project would implement Mitigation Measure HAZ-A, requiring preparation of a Soil and Groundwater Management Plan, which would include sampling and analyzing soil and groundwater, and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal. Nevertheless, in response to comments requesting additional clarification on the enforcement mechanisms and standards in Mitigation Measure HAZ-A, an addition to the Draft EIR has been provided to clarify that the Soil and Groundwater Management Plan shall be submitted to the Los Angeles Department of Building and Safety for review prior to the commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The addition also recognizes that Mitigation Measure HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.

Appendix M, Potential Excavated Material Disposal Analysis

In response to comments on the Draft EIR, Appendix M, Potential Excavated Material Disposal Analysis, of the Final EIR, was prepared to provide additional information on the disposal of excavated material. Appendix M conservatively estimated that approximately 14,119 cubic yards (cy) of material could potentially require disposal at a landfill as waste. Based on the potential contaminants and their concentrations in the excavated material, such material may be classified as 1) non-hazardous, 2) non-RCRA hazardous, or 3) RCRA hazardous. As summarized in Appendix M, it was estimated that 11,802 cy of the 14,119 cy may require disposal at a landfill as non-hazardous waste.

5.1.13 Land Use and Planning

Rim of the Valley Trail Corridor

In 1983, the legislature extended the geographic limits of the Santa Monica Mountains Zone to encompass an area known as the Rim of the Valley Trail Corridor. The Rim of the Valley Trail Corridor is a network of

parcs and trails that connects the Santa Monica, Santa Susana, Sespe, and San Gabriel Mountains. It was created to facilitate the development of an interlocking, connected system of public parks, trails and wildlife habitat preserves within mountain areas. In 1990, the Santa Monica Mountains Conservancy (SMMC) published the Rim of the Valley Trail Corridor Master Plan, as authorized by Assembly Bill 1516 (1989), to guide the activities and expenditures of the SMMC over a ten-year planning period in creating a multi-use long distance trail, known as the Rim of the Valley Trail, which would be focused on preservation of important resources and provision of public recreation.

While the proposed Project is located within the boundaries of the Rim of the Valley Trail Corridor, the proposed Project would have no impact on the Rim of the Valley Trail, which is located north of Elysian Park, across Interstate I-5. The proposed Project would provide access to and connectivity between El Pueblo, Los Angeles State Historic Park, and Elysian Park.

El Pueblo

a) El Pueblo General Plan

Comments on the Draft EIR requested an analysis of the proposed Project's consistency with the El Pueblo General Plan. The Draft EIR discussed the El Pueblo General Plan in Section 3.05, Cultural Resources. Under CEQA Guidelines section 15125(d), an EIR must discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans," and does not require a discussion where the proposed project would be consistent with such plans. Accordingly, the Draft EIR was not required to discuss consistency with each and every plan or policy. Further, under the Planning and Zoning Law (Government Code §§ 65000-66499.58), strict conformity with all aspects of a general plan is not required. The proposed Project would be consistent with the El Pueblo General Plan, and therefore, CEQA did not require the Draft EIR to include a discussion of this consistency. Nevertheless, for informational purposes, Section 5.2 of the Final EIR includes an analysis of the proposed Project's consistency with the applicable El Pueblo General Plan goals and policies.

b) El Pueblo Master Plan

On June 2, 2023, the City of Los Angeles, Department of Public Works, Bureau of Engineering, issued Task Order Solicitation (TOS) No. 94 for the El Pueblo Master Plan (Work Order No. E1909106)⁴ ("TOS") seeking proposals for comprehensive master planning and design consulting services to redevelop the Master Plan for the El Pueblo de Los Angeles Historical Monument (El Pueblo) ("new El Pueblo Master Plan"). The TOS states that the new El Pueblo Master Plan will assist in the protection and activation of historic and cultural resources, prioritization of future development goals, identification of the highest and best use for future commercial revenue generating opportunities, and the execution of projects. The TOS provides that objectives for the new El Pueblo Master Plan are centered on guiding new development, appropriate adaptive reuse of existing buildings, reinvigorating the commercial vitality of retail and dining, expanding meaningful and accessible cultural and educational offerings, and

⁴ City of Los Angeles. 2023. Task Order Solicitation (TOS) No. 94 for the El Pueblo Master Plan (Work Order No. E1909106).

preserving the district’s historic scale while linking the area to surrounding cultural districts. The TOS’ stated goals for the new El Pueblo Master Plan include the following:

- Include a framework and protocols to initiate public-private development projects between El Pueblo, City Council and interested developers in the Final Master Plan.
- Develop a plan to strengthen pedestrian and public transportation circulation to the adjacent communities and municipal entities such as, but not limited to the adjacent Metro Project and the Downtown Los Angeles Community Plan update.

The City is currently developing the new El Pueblo Master Plan. While the City has articulated objectives and goals in the TOS for the new El Pueblo Master Plan, there is no draft available at the time of drafting this Final EIR. It is unknown when the new El Pueblo Master Plan would be adopted. For informational purposes, this Section 5.1.5 notes that the proposed Project is consistent with the goals as set forth in the TOS. As discussed in Section 2.0, Project Description, of the Draft EIR, the Alameda Station would be located on Alameda Street adjacent to the planned LAUS Forecourt and Placita de Dolores at El Pueblo. There would be two access locations for the Alameda Station – the planned LAUS Forecourt to the east of Alameda Street and the proposed new pedestrian plaza at El Pueblo north of the Placita de Dolores to the west of Alameda Street. Consistent with the goal to strengthen pedestrian and public transportation circulation to adjacent communities, the proposed Project would provide active transportation connectivity along the proposed Project alignment through pedestrian access enhancements. The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region’s rapidly growing regional transit system at LAUS, as well as the businesses at El Pueblo and downtown Chinatown. The proposed Project would also provide new connections to and between currently underserved neighborhoods and uses along the proposed alignment, including El Pueblo, Chinatown, Mission Junction, the Los Angeles State Historic Park, Elysian Park, and Solano Canyon.

Consistent with the goal of reinvigorating the commercial vitality of retail and dining, and expanding meaningful and accessible cultural and educational offerings, as discussed in Topical Response C, Project Features, this new mode of transportation will expand rider access to the regional transit system by attracting new visitors, and represents an opportunity to increase pedestrian traffic along the proposed Project alignment, creating economic opportunities for local businesses, including shops and restaurants, through potential partnerships that drive customers to El Pueblo, Chinatown and other areas along the proposed Project alignment, which, consequently, adds revenues to these businesses in the communities the proposed Project hopes to serve. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street. The proposed Project would provide area residents and businesses with safe, affordable, and clean transit access to local businesses and institutions. The proposed Project could partner, for example, with the Chinese American Museum, the Italian American Museum, Chinatown businesses, and Olvera Street Merchants to help in addressing visitor,

educational, and customer access to these businesses and institutions. In addition, the Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. The goal of this interpretation plan is to develop a program that would provide all riders with an engaging and informative experience that would enhance their understanding and appreciation of the culture and history of the adjacent neighborhoods, including El Pueblo, Chinatown, Mission Junction, the Los Angeles State Historic Park, the Dodger Stadium property and its history as it relates to Chavez Ravine, and Elysian Park.

The proposed Project is consistent with the goal of preserving El Pueblo’s historic scale. Refer to Section 3.5.4, Environmental Impacts, of the Draft EIR, for a discussion outlining the proposed Project’s potential construction and operational impacts to historic resources, including the Los Angeles Plaza Historic District (referred to as El Pueblo de Los Angeles). Construction and operational historic resources impacts associated with the proposed Project would be less than significant, including with respect to the Los Angeles Plaza Historic District.

5.1.14 Noise

3S Gondola System Sound Measurements Memo

Appendix L, 3S Sound Measurements Memo, of the Final EIR, is a memorandum from Leitner Poma providing additional detail on the operational noise from the 3S gondola system in Tyrol, Austria at the Stubai Glacier. This memorandum was provided as an update to a prior memorandum from Leitner Poma about its 3S gondola system, which is included in the Noise Measurement Detail at p. A-24 in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. Appendix L, 3S Sound Measurements Memo, of the Final EIR, provides additional detail about the Leitner Poma 3S gondola system but does not change any of the information previously provided as part of the Noise Measurement Detail at p. A-24 in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. The information from Appendix L, 3S Sound Measurements Memo, of the Final EIR, is used in Topical Response P, Gondola System Noise Model, to respond to comments concerning the noise model used to predict noise levels from operations of the proposed Project.

Revisions to Mitigation Measure VIB-A

As described in Section 3.13, Noise, of the Draft EIR, the proposed Project outlined in Mitigation Measure VIB-A that vibration monitoring equipment would be placed “at least 26 feet away” from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery. This mitigation measure has been revised to specify that the monitoring equipment would be placed at a distance of “approximately 26 feet” in responses to comments suggesting that the measure should specify the maximum distance away from the resources where the equipment could be located and still detect potential vibration. This revision clarifies the location of such equipment.

5.1.15 Transportation

Revisions to Mitigation Measure TRA-A and Add TRA-PDF-A

As described in Section 3.17, Transportation, of the Draft EIR, the proposed Project had outlined in Mitigation Measure TRA-A certain “visibility enhancement features,” outlining potential options for such

features to increase pedestrian visibility near the Alameda Tower and near the Chinatown/State Park Station at the driveway crossing south of the Los Angeles State Historic Park. As stated on page 3.17-41, the specific mitigation at Alameda Tower is to prohibit right turns on red from westbound Alhambra Avenue to northbound Alameda Street. As stated on page 3.17-42, the specific mitigation at Chinatown/State Park Station is channelization of pedestrians to the crosswalk where visibility is sufficient. In response to comments on the Draft EIR suggesting that Mitigation Measure TRA-A did not clearly define the visibility enhancements for the proposed Project, Mitigation Measure TRA-A has been revised to identify the necessary mitigation for each location, consistent with the analysis in the Draft EIR.

Mitigation Measure TRA-A would reduce potential hazards due to a geometric design feature to less than significant, including for pedestrians at the driveway crossing south of the Los Angeles State Historic Park due to the channelization measure provided in Mitigation Measure TRA-A in order to limit the potential for pedestrians to cross behind the Chinatown/State Park Station's columns. The proposed Project does not result in any potential visibility hazards related to the sidewalk at this location, as discussed on page 3.17-42 of the Draft EIR, which notes that "pedestrians crossing in the crosswalk across the existing driveway immediately south of the Los Angeles State Historic Park would be fully visible to vehicles turning into the existing driveway, and no sight distance obstructions would be present." Nevertheless, in order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Dodger Stadium Game / Event Fares

As discussed in Appendix N, Ridership Model Development Memorandum, of the Draft EIR, the proposed Project's ridership model is based on data, including anticipated fares. In response to comments on the Draft EIR, Appendix N has been revised to clarify that the model assumes no fare to ride the proposed Project for 84 Dodger games/events at Dodger Stadium each year.

Tourist Ridership

Appendix N of the Draft EIR includes the HR&A Analysis of Potential LA ART Tourist Ridership. In response to comments on the Draft EIR, "tourist" riders refer to all riders except riders to Dodger games/events at Dodger Stadium and community transit riders (i.e., those under the Community Access Plan described in Section 3.0, Project Description, of this Final EIR).

5.1.16 Wildfire

Memo Regarding Attorney General Guidance

In October 2022, the California Attorney General published guidance for lead agencies to analyze and mitigate wildfire risks under CEQA for new development ("Wildfire Guidance"). The Wildfire Guidance focuses on CEQA compliance related to a proposed project's impacts on wildfire ignition risk, emergency access, and evaluation. The Wildfire Guidance recommends evaluation of local fire history, fire characteristics of the site (weather, slope, etc.), anticipated fire behavior, evacuation, and other factors that may influence a project's potential to cause wildfire impacts under CEQA. The Guidance is not binding on lead agencies and is intended to provide "suggestions" for the CEQA wildfire analysis. Nevertheless, an

overview of the Wildfire Guidance and Section 3.20, Wildfire, and Appendix P, Fire Hazard Assessment, of the Draft EIR, has been prepared and is provided in Appendix J to the Final EIR.

5.1.17 Alternatives

Pedestrian Enhancement Alternative

As discussed in Section 4.2.1, Alternatives Considered but Dismissed from Detailed Analysis, of the Draft EIR, one of the requirements for an alternatives analysis as set forth in the CEQA Guidelines is identification of alternatives that were considered by the lead agency but were dismissed as infeasible during the scoping process. Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. (CEQA Guidelines, § 15126.6(c).)

Comments on the Draft EIR suggested that a Pedestrian Enhancement Alternative, which would study a project alternative for more bike lanes, widened and improved sidewalks with enhanced safety features, and an escalator up the hill to Dodger Stadium, should have been considered. In response to those comments, a Pedestrian Enhancement Alternative connecting the Metro L Line (Gold) Chinatown Station to Dodger Stadium has been considered but dismissed from further detailed analysis because it does not meet most of the basic project objectives.

5.1.18 Other CEQA Considerations

Chavez Ravine

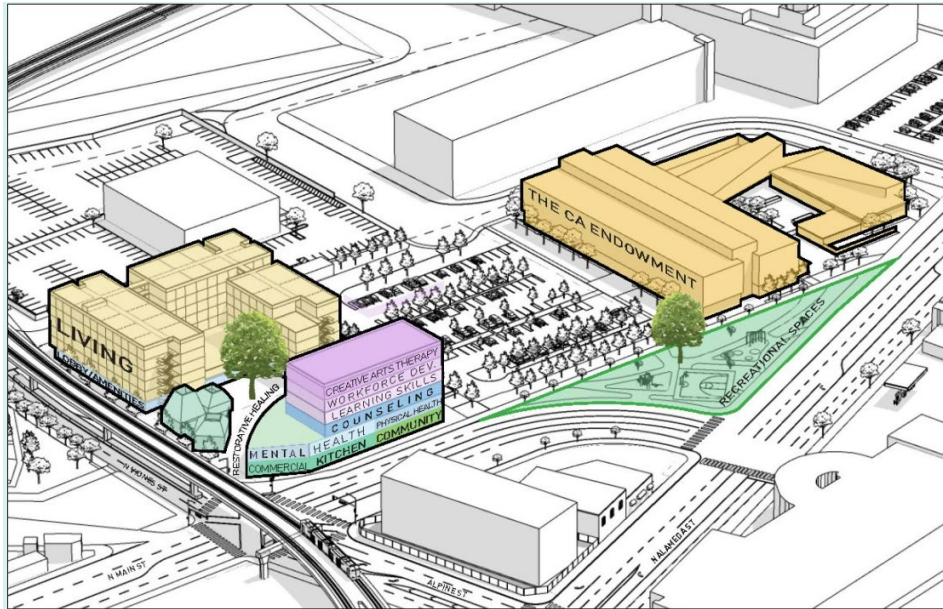
As described in Appendix F, Archaeological and Paleontological Resources Assessment, and Appendix G, Historical Resource Technical Report, of the Draft EIR, the former site of the community of Chavez Ravine, including the neighborhoods of Palo Verde, La Loma, and Bishop, is the current location of the Dodger Stadium property. The location of the proposed Project, including the location of the proposed Stadium Tower and the Dodger Stadium Station, was an area of a steep slope that was not developed as part of the three communities at Chavez Ravine. As described in the Historical Resources Technical Report, the residents, generations of Mexican Americans, lived a generally rural lifestyle and established their own stores, schools, and churches within Chavez Ravine. As described in the Archaeological and Paleontological Resources Assessment, the City of Los Angeles acquired Chavez Ravine in the early 1950s through the process of eminent domain with the intention of building new public housing on the site. Due to a City moratorium on the construction of public housing, this housing was never constructed. Subsequently, in 1957, the City transferred most of the area known as Chavez Ravine to the Brooklyn Dodgers for the construction of a Major League Baseball stadium. Dodger Stadium opened on the Dodger Stadium property in 1962.

The proposed Project will create opportunities for recognition of history and culture. The Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide interpretation and acknowledgment of the history associated with Chavez Ravine. The goal of this interpretation plan is to develop a program that would provide all riders with an engaging and informative experience that would enhance their understanding and appreciation of culture and history of the Dodger Stadium property and its history as it relates to Chavez Ravine and Elysian Park.

Hope Village

Subsequent to the release of the Draft EIR, The California Endowment published its Annual Report 2023⁵ with additional information regarding the Hope Village, which anticipates offering housing, community, and health services to formerly incarcerated, unhoused, and economically disadvantaged residents. A graphic in the Annual Report 2023 depicts the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue, as “RECREATIONAL SPACES.”

The following graphic from the Annual Report 2023 depicts the recreational spaces.



As detailed in Section 2.0, Project Description, of the Draft EIR, the proposed Project proposes to locate the Alameda Tower in the northwest corner of the Alameda Triangle. The Alameda Tower base would be 900 square feet. Refer to Figure 2-12: Proposed Alameda Tower Location, of the Draft EIR. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle.

The proposed Project would not impair or impact The California Endowment’s potential use of the Alameda Triangle for recreational spaces. As noted, the Tower base would be located in 900 square feet of the approximately 22,000 square foot Alameda Triangle. The following graphic depicts the Alameda Triangle, including space for both the Alameda Tower and potential recreational spaces based on the graphic in the Annual Report 2023.

⁵ The California Endowment. 2023. Annual Report 2023. Available at: <https://www.calendow.org/annual-report/>. Accessed September 2023.



The proposed Project's Alameda Tower would not impede The California Endowment's potential use of the Alameda Triangle for recreational spaces.

Office Building at 130 West College Street

In March 2023, Steven J. Riboli of S&R Partners, LLC announced plans to redevelop a surface parking lot at 130 West College Street with a five-story building featuring approximately 225,000 square feet of offices above approximately 8,200 square feet of ground-floor commercial space.⁶ An application for this proposed development was filed with the City of Los Angeles on April 4, 2023,⁷ subsequent to the release of the Draft EIR. The proposed Project alignment would not require aerial rights requirements over 130 West College Street.

5.1.19 Appendix Q, Proposed Alignment Plan and Profile

Appendix Q, Proposed Alignment Plan and Profile, of the Draft EIR includes additional detail and graphics as to the proposed Project alignment, including portions of the alignment over public ROW, publicly

⁶ Sharp, Steven. 2023. Five-story office building planned at 130 W College Street in Chinatown. Available at: <https://la.urbanize.city/post/five-story-office-building-planned-130-w-college-street-chinatown>. Accessed September 2023. See also Grimshaw. 2023. Grimshaw to transform LA Chinatown parking lot into all-electric mass timber office building. Available at: https://grimshaw.global/assets/uploads/130_West_College_Street_Grimshaw_Press_Release_1.pdf. Accessed September 2023.

⁷ City of Los Angeles Department of City Planning. 2023. CPC-2023-2306-GPA-VZC-HD-MCUP-SPR. Available at: <https://planning.lacity.org/pdiscaseinfo/search/encoded/MjY2MjM10>. Accessed September 2023.

owned property, and private properties. The proposed alignment profile also is provided in Appendix Q, Proposed Alignment Plan and Profile. In response to comments that the graphics included in Appendix Q, Proposed Alignment Plan and Profile, are difficult to read due to the scale of the graphics, Appendix Q has been updated in Appendix O, Supplemental Graphics of Proposed Alignment Plan and Profile, in the Final EIR, to add larger insets of several graphics for informational purposes, including: ANSI Requirements and Additional Separation Buffer Along Proposed Project Alignment Depicting ANSI Requirements and Additional Separation Buffer; ANSI Requirements and Additional Separation Buffer Along Proposed Project Alignment Depicting Public ROW | Publicly-Owned Property and Private Property; ANSI Requirements and Additional Separation Buffer Along Proposed Project Alignment Depicting Public ROW | Publicly-Owned Property and Private Property for which Project Sponsor has an Arrangement for Aerial Rights, and Private Property for which Project Sponsor Does Not have an Arrangement for Aerial Rights; ANSI Requirements and Additional Separation Buffer Along Proposed Project Alignment Depicting Respective Ownership of Public Property and Private Property; and the Profile. These supplemental graphics are larger scale insets of the graphics originally provided in Appendix Q of the Draft EIR. No changes to the graphics from Appendix Q were made. Appendix O, Supplemental Graphics of Proposed Alignment Plan and Profile, of this Final EIR, includes these larger scale versions of these graphics. Text describing the square footage of the estimated Additional Separation Buffer has also been provided for informational purposes in Appendix O.

5.1.20 Design Options A and B Plan and Profile

Appendix P, Design Option A Plan and Profile, and Appendix Q, Design Option B Plan and Profile, of this Final EIR, include additional detail and graphics as to the Design Option A and Design Option B alignments, respectfully, including portions of the alignments over public ROW, publicly owned property, and private properties. Text describing the square footage of the estimated Additional Separation Buffer has also been provided for informational purposes.

5.2 CORRECTIONS AND ADDITIONS TO DRAFT EIR SECTIONS AND APPENDICES

Additional changes have been made to the Draft EIR based on comments and/or new information that has become available since publication of the Draft EIR. Such changes to the Draft EIR are indicated in this section under the appropriate Draft EIR section or appendix heading. Deletions are shown with ~~striketrough~~ and additions are shown with underline. All citations to the Draft EIR refer to the version of the Draft EIR as originally released for public review and comment on October 17, 2022, and not as modified by this Final EIR.

ES: EXECUTIVE SUMMARY

Page ES-10, revise the paragraph as follows:

The Dodger Stadium Station is located adjacent to Dodger Stadium, which is operated as an MLB Stadium. ~~The proposed Project would~~ ~~The Project Sponsor will request consideration by the Los Angeles Dodgers of the potential for the Dodger Stadium Station to include a mobility hub at Dodger the Stadium property to provide connectivity to Elysian Park and the surrounding communities. where e~~Outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon. ~~Issues to be addressed in conjunction with such consideration as to the mobility hub include~~ The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for Dodger Stadium and the surrounding surface parking areas.

Table ES-2: Summary of Environmental Impacts, page ES-25, revise the first Biological Resources row as follows:

<p>BIO-1: <i>Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</i></p>	<p>Construction: Significant Impact.</p> <p>Operations: Less Than Significant Impact.</p>	<p>MM-BIO-A: <i>Avoid and minimize project-related impacts to special-status and/or roosting bat species.</i> During the maternity season (April 15 through August 31) prior to construction, a field survey shall be conducted by a qualified biologist to determine the potential presence of colonial bat roosts within 100 feet of the Alameda Station and Dodger Stadium Station footprints and SR-110 overpass over Stadium Way (near Stadium Tower) because these locations provide potentially suitable habitat. A visual inspection and/or one-night emergence survey of trees to be removed near the Alameda Station and Dodger Stadium Station and of the overpass shall be completed utilizing acoustic recognition technology to determine if any maternity roosts are present.</p> <p>To avoid any impacts on roosting bats resulting from construction activities for Stadium Tower, the following shall be implemented:</p> <p><u>At the SR-110 Overpass</u> Should an active maternity roost be found at the SR-110 overpass, a determination (in coordination with a qualified bat biologist) shall be made whether indirect effects of construction-related activities (i.e., noise and vibration)</p>	<p>Construction: Less Than Significant Impact with Mitigation.</p> <p>Operations: Less Than Significant Impact.</p>
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		<p>could substantially disturb roosting bats, and if exclusionary devices should be used to remove bats. This determination shall be based on baseline noise/vibration levels, anticipated noise levels associated with construction of the Stadium Tower, and the sensitivity to noise-disturbances of the bat species present. If it is determined that noise could result in the temporary abandonment of a maternity-roost, construction-related activities shall be scheduled to avoid the maternity season (April 15 through August 31), or as determined by the biologist.</p> <p>To avoid any impacts on roosting bats resulting from construction activities at Alameda Station and Dodger Stadium Station, the following shall be implemented:</p> <p><u>Trees</u></p> <p>All trees to be removed as part of the Project at the Alameda Station, Stadium Tower, and Dodger Stadium Station sites should be evaluated for their potential to support bat roosts. In particular, any palm and eucalyptus trees that bats are known to use should be evaluated by a qualified biologist by conducting a one-night emergence survey during acceptable weather conditions; or if conditions permit, physically examine the trees for presence or absence of bats (such as with lift equipment) before the start of construction/tree removal. Palm trees are present at the Alameda Station site along Alameda Street and eucalyptus trees are present at the Dodger Stadium Station site. The following measures would apply to trees to be removed that are determined to provide potential bat roost habitat by a qualified biologist.</p> <ul style="list-style-type: none"> • If roosting bats are determined present during the maternity season (April 15 through August 31), the tree shall be avoided until after the maternity season when <u>the</u> young are self-sufficient. If roosting bats are determined present during the winter months when bats are in torpor, a state in which the bats have 	
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		<p>significantly lowered their physiological state, such as body temperature and metabolic rate, due to lowered food availability (October 31 through February 15, but is dependent on specific weather conditions), a qualified bat biologist shall physically examine the roost if conditions permit for presence or absence of bats (such as with lift equipment) before the start of construction. If the roost is determined to be occupied during this time, the tree shall be avoided until after the winter season when bats are once again active.</p> <ul style="list-style-type: none"> • Trees with potential colonial bat habitat can be removed outside of the maternity season and winter season (February 16 through April 14 and August 16 through October 30, or as determined by a qualified biologist) using a two-step tree trimming process that occurs over 2 consecutive days. <ul style="list-style-type: none"> ○ Day 1, Step 1: Under the supervision of a qualified bat biologist, tree branches and limbs with no cavities shall be removed by hand (e.g., using chainsaws). This will create a disturbance (noise and vibration) and physically alter the tree. Bats roosting in the tree will either abandon the roost immediately or, after emergence, will avoid returning to the roost. ○ Day 2, Step 2: Removal of the remainder of the tree under the supervision of a qualified bat biologist may occur on the following day. Trees that are only to be trimmed and not removed would be processed in the same manner; if a branch with a potential roost must be removed, all surrounding branches would be trimmed on Day 1 under supervision of a qualified bat biologist and then the limb with the potential roost would be removed on Day 2. 	
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		<ul style="list-style-type: none"> • Trees with foliage (and without colonial bat roost potential), such as sycamores, that can support lasiurine bats, shall have the two-step tree trimming process occur over one day under the supervision of a qualified bat biologist. Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. Step 2 would be to remove the remainder of <u>the</u> tree on that same day. For palm trees that can support western yellow bat (a special-status bat species documented in the BSA with the potential to occur in the Project area), the two-step tree process shall be used over two days. Western yellow bats may move deeper within the dead fronds during disturbance. The two-day process will allow the bats to vacate the tree before removal. • The results of bat surveys, evaluations, and monitoring efforts that are undertaken shall be documented in a report by the qualified biologist at the conclusion of all bat-related activities. <p>MM-BIO-B: <i>Avoid and minimize project related impacts to nesting birds. To avoid impacts to nesting birds protected under the MBTA and CFGC resulting from construction activities that may occur during the nesting season, the following mitigation measure shall be implemented:</i></p> <ul style="list-style-type: none"> • Construction activities, including the clearance of trees potentially suitable for nesting birds, shall occur outside of the nesting season (generally February 1 through September 30). If construction activities must occur within this time period, the following measures shall be employed: <ul style="list-style-type: none"> ○ A pre-construction nesting survey shall be conducted by a qualified biologist within 3 days (72 hours) prior to the start of construction 	
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		<p>activities to determine whether active nests are present within 500 feet of the construction zone. All nests found shall be recorded.</p> <ul style="list-style-type: none"> ○ A minimum 300-foot no-work buffer shall be established around any active passerine bird nest. A minimum 500-foot no-work buffer shall be established around any active raptor nest. The qualified biologist shall monitor the nest on a weekly basis, and construction activities within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor shall be postponed until the biologist determines that the nest is no longer active. However, the standard 300 to 500 foot no-disturbance buffer distance may be adjusted (including increases or reductions to the buffer) by a qualified biologist on a case-by-case basis taking into consideration the location, type, duration and timing, and severity of work, distance of nest from work area, surrounding vegetation and line-of-sight between the nest and work areas (also taking into account existing ambient conditions from human activity within the line of sight), the influence of other environmental factors, and species’ site specific level of habituation to the disturbance. If the qualified biologist determines nesting activities may fail as a result of work activities, the biologist shall immediately inform the construction manager and all project work shall cease (except access along established roadways) within the recommended no-disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site. ○ Buffers will be delineated on-site with bright flagging, for easy identification by project staff. The on-site construction supervisor and operator staff 	
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		<p>will be notified of the nest and the buffer limits and instructed of the sensitivity of the area to ensure the buffer is maintained.</p> <ul style="list-style-type: none"> ○ A summary of preconstruction surveys and methodologies employed, monitoring efforts, and any no-disturbance buffers that were installed shall be documented in a report by the qualified biologist at the conclusion of each nesting season. <p><u>BIO-PDF-D:</u> The proposed Project shall avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides.</p> <p><u>BIO-PDF-G:</u> Tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).</p>	
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Table ES-2: Summary of Environmental Impacts, page ES-32, revise the fourth Biological Resources row as follows:

<p>BIO-4: <i>Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</i></p>	<p>Construction: Significant Impact.</p> <p>Operations: Less Than Significant Impact.</p>	<p>Refer to MM-BIO-A and MM-BIO-B as defined in BIO-1.</p> <p><u>BIO-PDF-B: Avian Collision Mitigation, Monitoring, and Adaptive Management Plan.</u> The Project Sponsor, in coordination with and subject to the approval of CDFW, shall develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan shall include the following components:</p> <p>(1) <u>Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or</u></p>	<p>Construction: Less Than Significant Impact with Mitigation.</p> <p>Operations: Less Than Significant Impact.</p>
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		<p><u>mortalities detected in the Project area during routine maintenance activities.</u></p> <p>(2) <u>An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species.</u></p> <p>(3) <u>Annual reporting criteria and requirements.</u></p> <p>BIO-PDF-C: Cabin Window Features. <u>The cabin windows shall be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces.</u></p> <p>BIO-PDF-H: <u>Any fencing used during and after the proposed Project’s construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trash cans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.</u></p>	
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Table ES-2: Summary of Environmental Impacts, page ES-32, revise the fifth Biological Resources row as follows:

<p>BIO-5: <i>Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</i></p>	<p>Construction: Less Than Significant Impact.</p> <p>Operations: No Impact.</p>	<p>No mitigation measures required.</p> <p>BIO-PDF-A: The Project will establish a Tree Protection Zone to protect trees during construction to establish and maintain a healthy environment for all retained trees during the course of construction. The Tree Protection Zone will apply to any trees within the construction footprint or any trees where a portion of their drip line overhangs the construction footprint (i.e., the trunk of a tree may be outside of the construction footprint, but the tree’s drip line overhangs the construction footprint). The Tree Protection Zone generally encompasses an area within the drip line of the tree plus an additional 5 feet depending on the species and size of the tree. Any construction activities within the Tree Protection Zone should follow the following guidelines for root protection. For utilities, any required trenching should be routed in such a manner as to minimize root damage. In areas where the grade around the Tree Protection Zone will be lowered, some root cutting may be unavoidable. Cuts should be clean and made at right angles to the roots. When practical, roots will be cut back to a branching lateral root to avoid root damage.</p> <p>BIO-PDF-E: Tree Disease Management. <u>Trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases, including but not limited to: thousand canker fungus (<i>Geosmithia morbida</i>), Polyphagous Shot Hole Borer (<i>Euwallacea spp.</i>), and goldspotted oak borer (<i>Agrilus auroguttatus</i>) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using the best available management practices relevant for each tree disease observed. Any agreement between the proposed</u></p>	<p>Construction: Less Than Significant Impact.</p> <p>Operations: No Impact.</p>
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		<p><u>Project and a tree removal contractor would include the provisions for tree disease management.</u></p> <p>BIO-PDF-F: <u>The proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including the following replacement ratios for trees:</u></p> <ul style="list-style-type: none"> • <u>City of Los Angeles:</u> <ul style="list-style-type: none"> ○ <u>“Protected” Trees: 4:1</u> ○ <u>Non-protected, but “significant” trees, i.e., where the trunk is > 8 inches at 4.5 feet DBH: 1:1</u> ○ <u>“Street trees” in the public ROW: as specified by Urban Forestry Division (typically 2:1)</u> • <u>California Department of Parks and Recreation: At least 1:1</u> • <u>Caltrans: Large trees, where the trunk is > 8 inches at 4.5 feet DBH: 1:1</u> 	
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Table ES-2: Summary of Environmental Impacts, page ES-33, revise the first Cultural Resources row as follows:

<p>CUL-1: <i>Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?</i></p>	<p>Construction: Significant Impact.</p> <p>Operations: Less Than Significant Impact.</p>	<p>Refer to MM-VIB-A and MM-VIB-B as defined in NV-2. The Winery</p> <p>CUL-PDF-A Pre-Construction Documentation of The Winery. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for The Winery, per the <i>Secretary of the Interior’s Standards and Guidelines for Architectural and Engineering Documentation</i>. The report will:</p> <ol style="list-style-type: none"> 1. Be prepared by a historic preservation professional meeting the Secretary of the Interior’s Professional Qualifications Standards for history, architectural 	<p>Construction: Less Than Significant Impact with Mitigation.</p> <p>Operations: Less Than Significant Impact.</p>
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		<p>history, or historic architecture with demonstrated experience in preparing HABS documentation.</p> <p>2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following:</p> <ul style="list-style-type: none"> a. The full north elevation (facing Cesar E. Chavez Avenue) and <ul style="list-style-type: none"> i. The roofline, foundation, and any door, window, or walkway openings, ii. Detail views showing the typical existing condition of the exterior wall, and iii. Detail views showing any existing damage to the exterior such as cracks or spalling b. West elevation (facing Olvera Street), and <ul style="list-style-type: none"> i. The roofline, foundation, and any door, window, or walkway openings, and ii. Detail views showing the typical existing condition of the exterior brick wall, and iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar c. East elevation (facing Alameda Street) <ul style="list-style-type: none"> i. The roofline and foundation, and ii. Detail views showing the typical existing condition of the exterior brick wall iii. Detail views showing any existing damage to the exterior such as loose bricks and mortar <p>3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage will be keyed to a sketch of the elevation indicating its location.</p>	
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		<ol style="list-style-type: none"> 4. Include copies of historic photographs and other supporting documentation, if available. 5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need only be distributed to repositories that express interest. <ol style="list-style-type: none"> a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs b. El Pueblo de Los Angeles Historical Monument Authority - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs c. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs <p>CUL-PDF-B Post-Construction Documentation of The Winery. Post-Construction: After construction is complete, pictures of The Winery equivalent to CUL-PDF-A will be taken to objectively compare the condition of The Winery before and after construction.</p> <p>In the event that damage to the Winery not documented at the time of the pre-construction survey is identified as being caused by construction activities during construction monitoring, the Project Sponsor will retain an experienced professional or professionals qualified to carry out the repairs within 12 months of completion of the project. Repairs will conform to the Secretary of Interior’s Standards for the Treatment of Historic Properties (36 CFR Part 68).</p>	
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		<p><i>El Grito (The Cry) Mural Project Design Features</i></p> <p>CUL-PDF- C Pre-Construction Documentation. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for the <i>El Grito</i> mural, per the <i>Secretary of the Interior’s Standards and Guidelines for Architectural and Engineering Documentation</i>. The report will:</p> <ol style="list-style-type: none"> 1. Be prepared by a historic preservation professional meeting the Secretary of the Interior’s Professional Qualifications Standards for history, architectural history, or historic architecture with demonstrated experience in preparing HABS documentation. 2. Include full-color digital photographs (with a minimum resolution of 300 ppi and 3,000-pixel image size along one dimension) showing the following: <ol style="list-style-type: none"> a. The entirety of the <i>El Grito</i> mural from edge to edge, looking straight on b. The left half of the <i>El Grito</i> mural looking straight on c. The right half of the <i>El Grito</i> mural looking straight on d. Oblique views illustrating the curvature of the wall e. Sequential photographs showing the various panels and subjects in greater detail f. The back and sides of the curved wall on which the <i>El Grito</i> mural is located g. Detail views showing: <ol style="list-style-type: none"> i. Typical profile view of the <i>El Grito</i> mural (e.g., showing the depth of the tiles on the substrate) ii. Notch shapes at the top two corners (two views, left and right) iii. Curved shape of the sides of the <i>El Grito</i> mural (two views, left and right side) 	
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		<ul style="list-style-type: none"> iv. Typical grout between tiles in two or more locations v. Bottom edge where the <i>El Grito</i> mural meets the plaza floor vi. Any existing damage or deterioration prior to construction <ol style="list-style-type: none"> 3. Include written descriptive data, including detailed notes of its pre-construction condition, index to photographs, and photo key plan. Photographs of existing damage should be keyed to a sketch of mural indicating its location. 4. Include copies of historic photographs and other supporting documentation, if available. 5. Be offered to the following repositories for use by future researchers and educators. Each repository will be contacted as to whether they are willing and able to accept the items, as well as their preferred format for transmittal. Copies need only be distributed to repositories that express interest. <ul style="list-style-type: none"> a. Los Angeles Public Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs b. UC Santa Cruz Library - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs c. Los Angeles Department of Cultural Affairs (DCA) - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs d. California State Library – One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs 	
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		<p>e. Mural Conservancy of Los Angeles - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs</p> <p>f. Museo Eduardo Carillo - One hard copy and/or digital file (dependent on repository preference) of the descriptive data, index to photographs, photo key plan, and photographs</p>	
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Table ES-2: Summary of Environmental Impacts, page ES-41, revise the second Cultural Resources row as follows:

<p>CUL-2: <i>Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?</i></p>	<p>Construction: Significant Impact.</p> <p>Operations: No Impact.</p>	<p>MM-CUL-A: Cultural Resources Monitoring and Mitigation Plan. A Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared for the Project by a qualified archaeologist meeting the Secretary of Interior Standards for Archaeology (36 CFR § 61) prior to construction. Where specific project components, such as the Chinatown/State Park Station, have requirements specific to that component, the CRMMP will lay out regulatory requirements (such as PRC 5024) which will be adhered to. This includes SHPO consultation and following practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible. The same would be for any specific requirement from El Pueblo de Los Angeles specific to the work at the Alameda sStation. The General Plan acknowledges the Park has archaeological sensitivities and, as such, recommends continued study of existing and potential resources as well as the need to constantly update and expand the knowledge of historic activities at the Park. As for the cultural resources associated with the Park, the General Plan states that the Park should “[i]dentify, document, evaluate, and interpret cultural resources at the Park,” and “[p]rotect, stabilize, and preserve significant cultural resources within the Park.”</p> <p>Specifically, the CRMMP shall be applicable to all ground disturbance activities extending into native soils within known archaeological sites and other areas of high</p>	<p>Construction: Less Than Significant Impact with Mitigation.</p> <p>Operations: No Impact.</p>
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		<p>sensitivity. Excavations within or within a specified radius of known archaeological sites shall be monitored up to <u>a</u> depth at which the qualified archaeologist determines the base of the archaeological deposit has been reached. The qualified archaeologist shall supervise the archaeological monitor. Monitoring is expected to be required to the maximum depth of planned excavations at the Alameda Station and up to approximately 15 feet in depth at Alameda Tower and the Chinatown/State Park Station. Work will also be monitored by Native American monitors in accordance with Mitigation Measure TCR-A. However, if in the course of excavations the qualified archaeologist determines that the site is disturbed or the sensitivity for significant archaeological resources is low because no resources have been encountered, then monitoring may be reduced or suspended. The monitoring plan shall define pre-construction coordination, construction monitoring for the excavations based on activities and depth of disturbance planned for each Project component (including ground disturbing activities in native soils within known archaeological sites), unanticipated discovery protocols, data recovery (including halting or diverting construction so that archaeological resources can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement (including a curation plan), and reporting. The Project Sponsor shall coordinate with the archaeologist and Metro to develop an appropriate treatment plan for the resources in accordance with California Public Resources Code (PRC) Section 21083.2(i) if they are determined by Metro to be potentially eligible for the CRHR or potentially qualify as unique archaeological resources pursuant to CEQA. <u>Preservation in place is the preferred method of treatment, but if preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource or preservation in place.</u> Key staff shall be identified, and the process of notification and consultation (where entities specific to each station would be identified) shall be specified within the CRMMP as well as protocols for reporting.</p>	
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		<p>If the discovery proves significant under CEQA and <u>data recovery is the selected means of treatment</u>, the archaeologist shall also be required to curate specimens in a repository with permanent retrievable storage and submit a written report to the lead agency within a year of completion of the fieldwork. Once complete, the final report shall be filed with the SCCIC.</p> <p>For Resource 19-004200 and the granite paving (within the Area of Direct Impact of the Project) at Site 19-003120, the CRMMP shall describe the required documentation and treatment of the resources during excavation and <u>potential removal</u>.</p> <p>MM-CUL-B: Archaeological Resources Worker Training Program. To mitigate unknown historical resources within the Area of Direct Impacts and mitigate potential impacts to them, <u>a qualified archaeologist shall be hired by the Project Sponsor to develop and conduct a worker training program for the Project with input from El Pueblo (as it pertains to the Alameda Station) and LASHP staff (as it pertains to the Chinatown/State Park Station) prior to the start of ground disturbing activities. The training shall be prepared by an archaeologist who meets the Secretary of the Interior’s Standards for Archaeology and will be adjusted to the specific details at the two parks. The training shall provide information to construction workers about the known locations of archaeological resources and potential areas that may be sensitive for archaeological resources associated with the Project. Participation in the training by LASHP and El Pueblo staff, will be encouraged. In the event construction crews are phased or rotated, additional training shall be conducted for the new construction workers conducting ground-disturbing activities. The qualified archaeologist shall retain documentation demonstrating that the appropriate construction workers attended the worker training program. An appropriate presentation shall be prepared by a qualified archaeologist which shall describe and illustrate resources likely to be encountered by Project excavation and outline the protocol to be followed in the event of a find. If any archaeological</u></p>	
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		<p>resources are encountered during ground-disturbing activities, work shall be temporarily halted in the vicinity of the find and the Construction Contractor shall contact the qualified archaeologist to examine and evaluate the resource in accordance with the provisions of CEQA as outlined by the CRMMP.</p> <p>MM-CUL-C: Archaeological Testing Plan for 19-000887 and 19-004320 (Alameda Station). To mitigate impacts to Resources 19-000887 and 19-004320, both of which include portions of the Zanja, an NRHP-eligible archaeological site, and where avoidance is not feasible, an archaeological testing plan and data recovery plan for the Area of Direct Impacts, which is located north of the Placita de Dolores, shall be prepared prior to ground disturbing activities and implemented after the paving is removed. Although the proposed Project is designed to not impact the portion of the Zanja Madre within 19-000887, there is the potential to encounter either previously unrecorded portions of the Zanja or artifact refuse from the overall site. Therefore, a testing plan shall be prepared for the portions of the sites that will be impacted outside of the known Zanja location. Within the Project Area of Direct Impacts, resource 19-000887 overlaps unevaluated resource 19-004320, which will therefore also be included in the testing plan. The testing plan shall be prepared in consultation with El Pueblo de Los Angeles Historical Monument Authority specific to these resources at the Alameda Station.</p> <p>The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts and contain maps showing the overlap of the sites with the project Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery. The testing plan shall be implemented once the paving has been removed and far</p>	
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		<p>enough in advance of construction for there to be sufficient time to carry out the plan and to prepare a plan for and conduct a data recovery program if needed.</p> <p>If significant archaeological remains are encountered that appear to contribute to the significance of the overall site during the test excavations <u>and avoidance/preservation-in-place is not feasible</u>, data recovery excavations will be required, and a data recovery plan shall be prepared and implemented. The data recovery plan shall detail the treatment of the surviving archaeological remains, if testing identifies any. The data recovery plan will specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.</p> <p>MM-CUL-D: Archaeological Testing Plan for LAUS Forecourt. To mitigate impacts to Resource 19-001575, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria threshold that would require data recovery.</p> <p>If significant archaeological remains are encountered that appear to contribute to the site’s NRHP and CRHR eligibility during the test excavations <u>and avoidance/preservation-in-place is not feasible</u>, data recovery excavations will be required, and the data recovery plan shall be implemented. The data recovery plan shall specify a statistically significant</p>	
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		<p>sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.</p> <p>MM-CUL-E: Archaeological Testing Plan for Los Angeles State Historic Park. To mitigate unavoidable impacts to Resource 19-003120, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall be prepared in consultation with California State Parks and SHPO (per PRC 5024.5). The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project; and will specifically be used to confirm and define potential foundations for the Southern Pacific Railroad office/freight house that are shown in Sanborn fire insurance maps to overlap the ADI for the station. The plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery.</p> <p>If significant archaeological remains are encountered that appear to contribute to the site’s NRHP and CRHR eligibility during the test excavations and avoidance/preservation-in-place is not possible, data recovery excavations will be required, and the data recovery plan shall be implemented. The plan shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.</p>	
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		<p>MM-CUL-F: Redesign of Placement of Park Amenity Structures to Avoid Archaeological Features at Los Angeles State Historic Park Station. After implementation of CUL-E, if it is found that the Park amenities (e.g., concessions and restroom) at the Los Angeles State Historic Park have the potential to impact any significant features found during the testing phase of CUL-E, the location of the park amenity structures will be reconfigured to avoid and/or diminish impacts to those features as feasible.</p>	
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Table ES-2: Summary of Environmental Impacts, page ES-49, revise the third Cultural Resources row as follows:

<p>CUL-3: <i>Would the Project disturb any human remains, including those interred outside of formal cemeteries?</i></p>	<p>Construction: Significant Impact. Operations: No Impact.</p>	<p>Refer to MM-CUL-D and MM-CUL-F as defined in CUL-2.</p>	<p>Construction: Less Than Significant Impact with Mitigation. Operations: No Impact.</p>
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Table ES-2: Summary of Environmental Impacts, page ES-53, revise the first Greenhouse Gas Emissions row as follows:

<p>GHG-1: <i>Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</i></p>	<p>Construction: Less Than Significant Impact. Operations: Less Than Significant Impact.</p>	<p>No mitigation measures required. GHG-PDF-A: Green Power. <u>Electrical power for the operation of the proposed Project’s aerial gondola system and associated stations, junction, and towers would come from renewable resources. The proposed Project shall achieve this through applying to LADWP’s Green Power Program or other available LADWP (or equivalent) programs that provide renewable electricity.</u></p>	<p>Construction: Less Than Significant Impact. Operations: Less Than Significant Impact.</p>
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Table ES-2: Summary of Environmental Impacts, page ES-55, revise the first Hazards and Hazardous Materials row as follows:

<p>HAZ-1: <i>Would the Project create a significant hazard to the public or the environment through the routine transport, use, or</i></p>	<p>Construction: Significant Impact.</p>	<p>MM HAZ-A: Prepare a Soil and Groundwater Management Plan: The Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities. The Soil and</p>	<p>Construction: Less Than Significant Impact with Mitigation.</p>
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<p><i>disposal of hazardous materials?</i></p>	<p>Operations: Less Than Significant Impact.</p>	<p>Groundwater Management Plan would be prepared and implemented to specify methods for handling and disposal in the event contaminated groundwater, contaminated soil, or structures, are encountered during project construction. The Soil and Groundwater Management Plan shall provide a summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater in order to classify them as either hazardous or non-hazardous, and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. Methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations and be protective of workers and the environment.</p> <p><u>This Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). Contract specifications shall mandate full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.</u></p> <p>MM-HAZ-B: Hazardous Materials Abatement. Prior to demolition of the existing building at 1201 North Broadway, a licensed abatement contractor will conduct hazardous</p>	<p>Operations: Less Than Significant Impact.</p>
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		<p>materials abatement, which would remove, dispose of, and transport hazardous materials in accordance with federal, state, and local regulations. The licensed abatement contractor would be required to comply with Cal/OSHA regulations governing asbestos standards and lead paint standards (California Code of Regulations Article 4 Sections 1529, 5208, and 1532), OSHA 29 CFR Section 1926.62 regarding lead construction, and OSHA 29 CFR Section 1926.1101 regarding asbestos exposure. The contractor would also be required to comply with SCAQMD Rule 1403, related to asbestos emissions during building demolition activities. Safe work measures would be taken during the hazardous materials abatement, including wetting the area to prevent possible release of hazardous materials into the air, removing dust with high-efficiency particulate air vacuums and/or disposable wet wipe towels.</p>	
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Table ES-2: Summary of Environmental Impacts, page ES-67, revise the second Noise row as follows:

<p>NV-2: <i>Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?</i></p>	<p>Construction: Significant and Unavoidable.</p> <p>Operation: Less Than Significant Impact.</p>	<p>MM-VIB-A: <i>Vibration Monitoring.</i> Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Vibration Monitoring Plan. The Plan shall provide for:</p> <ul style="list-style-type: none"> • Vibration Monitoring Equipment: the placement of vibration monitoring equipment at least <u>approximately</u> 26 feet away from the Avila Adobe (1970s addition), El Grito mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at the Alameda Station requiring heavy equipment or ground compaction devices. • Modification of Vibration Equipment: The monitoring devices shall notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold. The construction crew shall modify 	<p>Construction: Significant and Unavoidable.</p> <p>Operation: Less Than Significant Impact.</p>
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		<p>the construction equipment to ensure that the vibration damage threshold is not exceeded.</p> <p>MM-VIB-B: Force Adjustable Ground Compaction Devices. For construction work occurring at the Alameda Station in proximity to the Avila Adobe (1970s addition), El Grito Mural, and The Old Winery:</p> <ul style="list-style-type: none"> • At a distance of 26 feet or more from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery, any ground compacting equipment, including vibratory rollers and plate compactors, shall be calibrated onsite prior to use to ensure vibration levels remain below the assumed reference level of 0.21 PPV, in/sec, at 25 feet. If the ground compacting equipment cannot achieve the assumed reference level, equipment with less vibration (less than 0.21 PPV, in/sec, at 25 feet), non-vibrating equipment, or hand tools shall be required for ground compaction activities. • Any ground compaction or excavation/drilling operations within 26 feet of the Avila Adobe (1970s addition), El Grito Mural or The Old Winery structures must be completed with non-vibrating equipment or hand tools. <p>Refer to CUL-PDF-A, CUL-PDF-B, CUL-PDF-C, CUL-PDF-D, and CUL-PDF-E as defined in CUL-1</p>	
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Table ES-2: Summary of Environmental Impacts, page ES-75, revise the third Transportation row as follows:

<p>TRA-3: <i>Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</i></p>	<p>Construction: Significant Impact.</p> <p>Operations: Significant Impact.</p>	<p>MM TRA-A: Visibility Enhancements: Prior to the completion of construction of the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall design <u>the following visibility enhancements at</u> for the following locations sufficient to alert drivers to the presence of pedestrians:</p> <ul style="list-style-type: none"> • Alameda Tower – <u>Implement a no right turn on red restriction to prohibit vehicles from making a right turn</u> 	<p>Construction: Less Than Significant Impact with Mitigation.</p> <p>Operations: Less Than Significant Impact with Mitigation.</p>
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		<p><u>on red from westbound Alhambra Avenue to northbound Alameda Street.</u></p> <ul style="list-style-type: none"> • <u>Chinatown/State Park Station – Implement an operational strategy or design to channelize pedestrians walking from the Los Angeles State Historic Park to the crosswalk across the existing driveway south of the Park to prevent pedestrians from crossing the driveway west of columns supporting the Chinatown/State Park Station to ensure crossings occur in the crosswalk where visibility is sufficient. The ultimate design or operational method of channelization (such as station staff directing pedestrians towards the crosswalk or a physical method such as a gate) would be coordinated with State Parks.</u> <p>Visibility enhancement features could include high visibility crosswalk treatments, advanced crossing warning signs, flashing beacons, upgraded lighting, and new or upgraded traffic controls, such as traffic signals and all-way stops and right turn on red restrictions and channelization of pedestrians to marked crosswalk locations via fencing. The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations.</p> <p>MM-TRA-B: Construction Traffic Management. Plan: Prior to the issuance of a building permit for the proposed Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City for review and approval. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP shall be based on the nature and timing of the specific construction activities at each of the Project construction sites. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project.</p>	
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		<p>The CTMP may be updated as construction progresses to reflect progress at the various Project construction sites. The CTMP will include, but not be limited to, the following elements as appropriate:</p> <ul style="list-style-type: none"> • As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. • Visibility to open pedestrian crossings will be maintained, or temporary or permanent measures consistent with TRA-A shall be implemented if determined to be appropriate in coordination with LADOT. In absence of measures to mitigate or eliminate visual obstructions for pedestrians crossing the street, pedestrian crossings may be closed or relocated to more visible locations. • Existing school crossings, as denoted by yellow crosswalk striping consistent with the Manual on Uniform Traffic Control Devices (MUTCD) along proposed detour routes shall be evaluated in coordination with LADOT to determine if crossing guards should temporarily be assigned. If it is determined that crossing guards should be assigned, on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods during periods when adjacent schools are in session. If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with LADOT, and would be implemented by the proposed Project if deemed necessary. • As partial and full street closures are anticipated at various locations during portions of the Project construction, detour plans, approved by the City of Los Angeles, shall be developed and implemented to route 	
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		<p>vehicular traffic and bicyclists to alternative routes during these periods.</p> <ul style="list-style-type: none"> • Ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during project construction. In some cases, alternative access locations would be provided or supervised temporary access through the worksite would be accommodated during construction phases where access is hindered, such as foundation construction. • Coordinate with the City and emergency service providers to ensure emergency access is provided to the Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary. • Conduct <u>bi-monthly</u> 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 bimonthly, or as otherwise determined appropriate by City Staff. • Provide off-site truck staging in a legal area furnished by the construction truck contractor. • Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods. • During construction activities when construction worker parking cannot be accommodated at the Project component sites, identify alternate parking location(s) for construction workers and the method of transportation to and from the Project component sites (if beyond walking distance) for approval by the City 30 days prior to commencement of construction. 	
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		<p>Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.</p> <p><u>TRA-PDF-A: Additional Visibility Enhancements:</u> Subject to the approval of the Los Angeles Department of Transportation, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station, stripe a high visibility crosswalk and add upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.</p>	
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SECTION 1.0 INTRODUCTION

In addition to the general additions and corrections provided above, revise Section 1.0, Introduction, as follows:

Page 1-7, revise the first paragraph as follows:

The proposed Project would support healthy and equitable communities by providing a ~~potential~~ mobility hub at the Dodger Stadium property, where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program to provide connectivity to Elysian Park and the surrounding communities, as well as a ~~potential~~ mobility hub at the Chinatown/State Park Station.

SECTION 2.0 PROJECT DESCRIPTION

In addition to the general additions and corrections provided above, refer to Section 3.0, Project Description, of this Final EIR for revisions to this section.

SECTION 3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.01 AESTHETICS

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.02 AGRICULTURE AND FORESTRY RESOURCES

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.03 AIR QUALITY

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.04 BIOLOGICAL RESOURCES

In addition to the general additions and corrections provided above, revise Section 3.04, Biological Resources, as follows:

Page 3.4-1, revise the second paragraph as follows,

This chapter also includes information from the tree inventory report that was prepared for the Project by Carlberg Associates in March 2022 (Appendix E of this Draft EIR), and the Updated Tree Report that Carlberg Associates prepared in May 2023 (Appendix K.1 of the Final EIR).

Page 3.4-6, revise the second to last sentence of the first paragraph as follows:

The City’s Ordinance requires replacement of protected trees at a ~~2:1~~ 4:1 ratio, and the size and number of replacement trees shall approximate the value of the tree to be replaced.

Page 3.4-8, add the following footnote to the first paragraph:

Results of the tree inventory prepared for the Project (provided in Appendix E) are also incorporated, and referenced for each Project component site.¹

¹Carlberg Associates prepared an Updated Tree Report on May 11, 2023, which clarified the criteria for inclusion in the report’s tree inventory, and remedies certain counting errors, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as in the March 28, 2022 tree inventory report. The Updated Tree Report is included in Appendix K.1 of the Final EIR.

Page 3.4-11, revise the second paragraph as follows,

~~Both~~ All three field surveys, discussed in Section 3.4.3, Methodology, conducted for the proposed Project were conducted during the bird breeding season, generally considered to extend from February 1 through September 30, or as early as December or January through July for raptor species. During the surveys, tall structure such as mature trees, power poles and towers, billboards and buildings were scrutinized for the presence of nests. Raptor species such as red-tailed hawk (*Buteo jamaicensis*), Cooper’s hawk (*Accipiter cooperii*), great horned owl (*Bubo virginianus*), American crow (*Corvus brachyrhynchos*), and common raven (*Corvus corax*) are known to use tall structures as nesting sites in urban environments. Red-tailed hawk were observed flying in the vicinity of Dodger Stadium during the 2021 survey.

Page 3.4-14, revise the second paragraph as follows:

A field survey of the proposed Project alignments was conducted on April 1, 2020 during the bird breeding season—generally considered to extend from February 1 through September 15, or as early as December or January through July for raptor species—to document and photograph existing biological resources. During the survey, tall structures such as mature trees, power poles and towers, billboards, and buildings were scrutinized for the presence of nests. A ~~follow-up~~ second survey was conducted on April 24, 2021 to verify and record tree species occurring in the Project component footprints. A third survey was performed on March 23, 2023 to provide an updated habitat assessment for sensitive species and supplementary wildlife survey effort. This survey effort is discussed in greater detail in Appendix G, Supplemental Biological Resources Report, of the Final EIR. Results of the field surveys were used to determine the presence of biological resources such as sensitive ecological areas, wetlands, wildlife migratory corridors, and/or conserved areas in the Project area, and if those areas could potentially support special-status species and sensitive communities identified during the literature review. Binoculars were used to scan for evidence of wildlife activity and for potential bird nest sites. Seasonal, species specific botanical and wildlife surveys were not conducted as part of this evaluation, because existing conditions in the BSA do not provide the undisturbed native habitats preferred by regional special-status plant and wildlife species.

Page 3.4-14, revise the third paragraph as follows:

A tree inventory report was also prepared by Carlberg Associates on March 28, 2022, for the Project alignment, including the construction zones and areas along the alignment between Project components, and trees that could otherwise encroach within 50 feet from the centerline of the proposed Project’s ropeway. Carlberg Associates prepared an Updated Tree Report on May 11, 2023, which clarified the criteria for inclusion in the report’s tree inventory, and remedies certain counting errors, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as in the March 28, 2022, tree inventory report. The Updated Tree Report is included in Appendix K.1 of the Final EIR. Trees occurring along the Project alignment were inventoried for species, size, and location. One species protected under the City’s Native Tree Protection Ordinance, Mexican elderberry, was identified at the Broadway Junction site, and would be removed by the Project. Western sycamore trees occur in the BSA at the Alameda Tower and Chinatown/State Park Station sites, and toyon at the Chinatown/State Park site. Under the City’s Native Tree Protection Ordinance, protected native trees and shrubs that were planted or grown as part of a planting program are not “Protected Trees.” A review of historical aerial imagery indicates the western sycamore trees at the Alameda Tower site were intentionally installed as part of a landscaping effort in 2008, when these trees and other ornamental vegetation were planted. Western sycamore trees and toyon shrubs at the Chinatown/State Park site and under the portion of the alignment crossing over the Los Angeles State Historic Park were installed in 2016 during construction of the southern entrance to the Los Angeles State Historic Park, as part of a tree planting program. Therefore, the western sycamore trees and toyon shrubs at both the Alameda Tower and Chinatown/State Park Station sites are not naturally occurring and are not “Protected Trees” subject to the City’s Native Tree Protection Ordinance. The western sycamore trees and toyon shrubs that were installed in 2016 at the Los Angeles State Historic Park occur on State property and may require replacement, because they are subject to the California Department of Parks and Recreation State requirements for a special permit “to remove, treat, disturb, or destroy plants.”

Page 3.4-17, revise the first paragraph as follows:

The proposed Dodger Stadium Station, may provide potentially suitable roosting habitat for individual and small groups of special-status bat species. Additionally, the overpass of SR-110 over Stadium Way occurs roughly 100 feet south-southeast of the proposed Stadium Tower, which could provide potentially suitable roosting habitat. The removal of certain trees for the proposed Project would result in a small reduction of habitat for wildlife species that depend on trees for cover, nesting, roosting, foraging, and other reasons. The magnitude of impacts to wildlife from tree removal depends on several factors, including the amount of habitat to be removed and the quality of that habitat. In the long-term, the impacts are also affected by the replacement plan for the removed trees.

The quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. Of the 26 tree species identified in the tree inventory report, 20 are considered non-native (and five of those are considered invasive). Furthermore, 122 of the 145 large trees (>8 inches DBH), and 71 of the 105 smaller trees, are non-

native species. All of the 57 native trees were planted as ROW trees (12 trees) or were planted as part of a plant program in the Los Angeles State Historic Park, and 34 of these 57 trees are young, with a DBH of <8 inches. Other areas are composed of 100-percent non-native trees, often covered in non-native and invasive vines such as Kudzu (*Pueraria montana*).

The only areas of tree removal that could be potentially described as wooded habitat are the following: the small grove of Fremont cottonwood trees at the western end of the Los Angeles State Historic Park, the non-native woodland at the Stadium Tower and associated fire buffer, and the non-native woodland at the Dodger Stadium Station location. The total area of wooded habitat that would be removed in each of these areas is 0.24, 1.02, and 0.39 acres, respectively. These areas are relatively small amounts of wooded habitat, relative to the amounts available in the immediately surrounding areas, such as Elysian Park (approximately 600 acres alone, much of which is wooded), Radio Hill Gardens, Victory Memorial Grove, and Point Grand View Park.

In the short-term, the removal of trees will result in a marginal reduction of suitable tree habitat for nesting birds, roosting bats, and other wildlife in the vicinity of the proposed Project. Common wildlife species would be expected to utilize adjacent habitats, and substantial population level impacts to common species would not be expected due to the small amount of habitat loss relative to the amount of habitat available in surrounding areas. In the long-term, the replacement of the 145 large trees proposed for removal with 242 new trees would more than offset any realized impacts associated with the proposed Project.

Page 3.4-18, revise the third paragraph as follows:

Therefore, with the implementation of Mitigation Measures BIO-A and BIO-B, construction of the proposed Project would have a less than significant impact on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. Nevertheless, to provide additional environmental benefits related to bird nesting and bat maternity roosting, the proposed Project would incorporate BIO-PDF-G, requiring that tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).

Page 3.2-19, revise the first full paragraph as follows:

During the daytime, resident birds or migrants using the habitat in the BSA would be able to visually detect and avoid colliding with the proposed stations, junction, towers, and cabins; however, they could collide with cable spans if the cables are more difficult to see and avoid. Compared to transmission lines, avian collisions with ropeway cables would be relatively unlikely, given that the cables would be 1.75 to 2.5 inches in diameter. By comparison, phase conductors on most transmission lines are 1 to 2 inches in diameter, while shield wires (the lines most associated with bird collisions on transmission lines because they are the highest wire and are smaller in diameter) range from 0.4 to 0.5 inch in diameter.¹⁷ The proposed Project would lack this shield wire component, which would be expected to reduce (not increase) collision risk, relative to transmission lines with shield wires. In addition, the ropeway cables would be arranged in two groups of three cables (one group per direction of travel), and the three cables in each

group would be spaced between a few inches and a few feet apart in the vertical plane. Relative to typical vertical spacing of transmission lines (at least 6 feet apart to avoid electrocution hazard), these two groups of cables could essentially be considered to be on the same vertical plane, rather than spanning multiple wire levels, which would reduce collision risk. In addition, the proposed Project would include slack carriers, which are another design component that would increase the visibility of the cables to birds. Slack carriers are devices that support and maintain proper separation between the cables of 3S systems. Slack carriers are attached to the system's two stationary cables (the "track ropes") and provide support sheaves for the third cable that circulates continuously around the system (the "haul rope"). While the exact quantity and location of the slack carriers along the track ropes would be determined during the design phases of the proposed Project, it is anticipated that slack carriers would be placed approximately every 350-500 feet with adequate separation from the stations, junction, and towers. The slack carriers of one gondola lane can be staggered from or aligned with the adjacent lane. Furthermore, the tight grouping of cables would be expected to make them more visible than one isolated cable the same size. Visibility of the cables would be further increased by the presence of moving cabins attached to them at regular intervals. The number of cabins passing over a given location along the alignment is expected to be 80 per hour during periods of low use, and 314 cabins per hour during Dodger games or events at Dodger Stadium. Furthermore, the windows on the cabins should not pose any collision risk to diurnal birds because they will be non-transparent (tinted), and partially covered with a vinyl window film, which would reduce reflectivity and increase visibility to birds. Overall, the larger diameter of the cables relative to wires on transmission lines, and grouping of multiple cables together on a single plane rather than dispersed across multiple planes, would likely result in a lower probability of avian collisions compared to that associated with transmission lines.

Footnote 8: Avian Power Line Interaction Committee. 2012. Reducing Avian Collisions with Power Lines: *The State of the Art in 2012*. Washington, D.C. Available at: http://www.aplic.org/uploads/files/15518/Reducing_Avian_Collisions_2012watermarkLR.pdf. Accessed April 2022.

Page 3.4-19, add the following after the first full paragraph:

With respect to nocturnal avian and bat collision risk, the proposed Project towers and cables are below the heights where most nocturnal avian collision impacts occur. Most avian flight during migration occurs at thousands of feet agl, whereas the proposed Project component heights are all below 200 feet agl.

Cable heights at:

- Alameda and Alpine Towers: 175 feet agl
- Stadium Tower: 159 feet agl
- All other stations/junction: 74 to 98 feet agl
- Tower heights: all are less than or equal to 195 feet

Indeed, structures below 200 feet agl contribute negligibly to overall annual bird mortality (Longcore et al. 2012), even in weather conditions with reduced cloud ceiling (USFWS March 2021). Further, as discussed below, these components located within an urban environment with many other obstacles of similar heights, and because avian flight during migration occurs at thousands of feet agl, the proposed Project components accordingly are not anticipated to contribute significantly to overall annual bird mortality.

Further, there are no natural migration concentration points near the proposed Project alignment. The Los Angeles River, which is approximately 0.5 mile east of the BSA is heavily impacted and is predominantly a concrete water-conveyance structure. The river corridor does not contain appreciable vegetation until it reaches more than 1 mile north of the proposed Project BSA. The Silver Lake Reservoir is more than 2 miles to the northwest. Waterbirds and other migrants may pass over the proposed Project en route to and from these locations, but there is no reason to believe the movement would be concentrated in the vicinity of the proposed Project (and below 200 feet agl) versus along alternate routes. Furthermore, direct movements between vegetated portions of the river and the Silver Lake Reservoir would not result in birds passing over the proposed Project alignment.

Furthermore, birds and bats flying in the vicinity of the proposed Project are already exposed to obstacles that present the potential for collision at heights similar to or greater than (>) the highest-reaching proposed Project components, such as the towers, which would reach 478 to 584 feet above mean sea level (amsl), or the ropeway cables associated with those towers, which would reach 458 to 564 feet amsl. These obstacles include:

- Buildings less than (<) 1 mile west of the proposed Project alignment, in downtown Los Angeles, some of which reach more than 1,000 feet agl;
- A 230 kilovolt LADWP-owned transmission line runs roughly parallel to the proposed Project, along the Los Angeles River corridor, between 2,400 and 3,000 feet to the east, with approximately 120 to 155-foot-tall (agl) transmission towers reaching approximately 400 to 435 feet amsl;
- The radio tower on aptly named Radio Hill, 700 feet northeast of the Stadium Tower, which reaches 640 feet amsl;
- The eight sets of stadium lights atop Dodger Stadium, at the northern terminus of the alignment, which reach 665 to 680 feet amsl; and
- A 23-story (291-foot-tall) building, proposed for construction 400 feet west of the proposed Project alignment.

Page 3.4-21, revise the third paragraph as follows:

Therefore, Mitigation Measures BIO-A and BIO-B would be implemented to reduce any potentially significant indirect impacts to localized bird movement or native wildlife nursery sites, specifically for bat roosts and bird nests. Mitigation Measure BIO-A would require a field survey be conducted by a qualified bat biologist to determine the presence of colonial bat roosts within 100 feet of the

Project component sites prior to construction and tree removal at the Alameda Station, Stadium Tower, and Dodger Stadium Station sites. Mitigation Measure BIO-B would require a pre-construction nesting survey be conducted by a qualified biologist within 3 days prior to the start of construction activities to determine whether active nests are present in or directly adjacent to the construction zone. In addition, standard construction practices related to the control of dust, noise, and vibration would also be implemented, as discussed in Threshold BIO-1. With implementation of Mitigation Measures BIO-A and BIO-B, impacts related to substantially interfering with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites during construction of the proposed Project would be reduced to a less than significant level. Therefore, impacts would be less than significant with the imposition of mitigation. Nevertheless, to provide additional environmental benefits related to local wildlife, the proposed Project would incorporate BIO-PDF-H, requiring that any fencing used during and after the proposed Project's construction would be constructed with materials that are not harmful to wildlife.

Page 3.4-21, revise the last paragraph as follows:

Less Than Significant. As discussed under construction, natural vegetation communities or waterways are not present in the BSA. Operation of the proposed Project may include noise and increased human activity, especially near station locations and queuing areas. Given the urbanized nature of the BSA and limited amount of suitable foraging and nesting habitat, special-status birds and raptors are not expected to occur in the BSA, except potentially as transient migrants. However, because migration is not expected to be concentrated in the BSA, and the proposed Project would operate in urbanized and developed communities, migratory species are unlikely to be impacted by the relatively minor change in environment. Additionally, common species in the area are unlikely to be impacted by the relatively minor change in environment. As described above, concentrated avian migratory activity is not expected in or near the BSA, because the Project alignment is on a broad urbanized coastal plain and lacks significant wetlands or similar habitats that might attract large numbers of migrants as stopover habitat. Therefore, operation of the proposed Project would result in a less than significant impact related to substantially interfering with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impeding the use of native wildlife nursery sites. Nevertheless, to provide additional environmental benefits related to the movement of birds, the proposed Project would incorporate BIO-PDF-B and BIO-PDF-C. BIO-PDF-B would require that the Project Sponsor, in coordination with and subject to the approval of CDFW, develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. BIO-PDF-C would require that the cabin windows be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight.

Page 3.4-22, add the following footnote to the first paragraph:

Less Than Significant Impact. A tree inventory report was prepared for the Project alignment, including the areas along the alignment between Project components.¹⁹ Trees occurring along the

Project alignment were inventoried for species, size, and location. Based on field surveys conducted on April 24, 2021, and a review of the March 28, 2022 tree inventory report, 250 trees along the Project alignment are proposed for removal, and 10 trees that were inventoried would be preserved.

Footnote 19: Carlberg Associates prepared an Updated Tree Report on May 11, 2023, which clarified the criteria for inclusion in the report's tree inventory, and remedies certain counting errors, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as in the March 28, 2022, tree inventory report. The Updated Tree Report is included in Appendix K.1 of the Final EIR.

Page 3.4-24, revise the second paragraph as follows:

The proposed Project would be required to adhere to the City's Street Tree policy regarding removal of street trees, which would occur in consultation with the Urban Forestry Division, as well as the California Department of Parks and Recreation's regulations concerning the removal of trees (14 CCR § 4306) if located on State property. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impacts would be less than significant. Nevertheless, to provide additional environmental benefits related to tree preservation, the proposed Project would implement BIO-PDF-E and BIO-PDF-F. BIO-PDF-E would require that trees scheduled for removal resulting from the proposed Project be inspected for contagious tree diseases and prohibit diseased trees from being transported from the Project site without treatment to avoid the spread of infectious tree diseases. BIO-PDF-F would require that the proposed Project comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including requirements under the City of Los Angeles, California Department of Parks and Recreation, and Caltrans.

Page 3.4-24, revise section 3.4.5, Project Design Feature as follows:

3.4.5 Project Design Features

BIO-PDF-A: The Project will establish a Tree Protection Zone to protect trees during construction to establish and maintain a healthy environment for all retained trees during the course of construction. The Tree Protection Zone will apply to any trees within the construction footprint, or any trees where a portion of their drip line overhangs the construction footprint (i.e., the trunk of a tree may be outside of the construction footprint, but the tree's drip line overhangs the construction footprint). The Tree Protection Zone generally encompasses an area within the drip line of the tree plus an additional 5 feet, depending on the species and size of the tree. Any construction activities within the Tree Protection Zone should follow the following guidelines for root protection. For utilities, any required trenching should be routed in such a manner as to minimize root damage. In areas where the grade around the Tree Protection Zone will be lowered, some root cutting may be unavoidable. Cuts should be clean and made at right angles to the roots. When practical, roots will be cut back to a branching lateral root to avoid root damage.

BIO-PDF-B: Avian Collision Mitigation, Monitoring, and Adaptive Management Plan. The Project Sponsor, in coordination with and subject to the approval of CDFW, shall develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan shall include the following components:

- (1) Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or mortalities detected in the Project area during routine maintenance activities.
- (2) An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species.
- (3) Annual reporting criteria and requirements.

BIO-PDF-C: Cabin Window Features. The cabin windows shall be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces.

BIO-PDF-D: The proposed Project shall avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides.

BIO-PDF-E: Tree Disease Management. Trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases, including but not limited to: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Euwallacea spp.*), and goldspotted oak borer (*Agilus auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using the best available management practices relevant for each tree disease observed. Any agreement between the proposed Project and a tree removal contractor would include the provisions for tree disease management.

BIO-PDF-F: The proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including the following replacement ratios for trees:

- City of Los Angeles:
 - “Protected” Trees: 4:1
 - Non-protected, but “significant” trees, i.e., where the trunk is > 8 inches at 4.5 feet DBH: 1:1
 - “Street trees” in the public ROW: as specified by Urban Forestry Division (typically 2:1)
- California Department of Parks and Recreation: At least 1:1
- Caltrans: Large trees, where the trunk is > 8 inches at 4.5 feet DBH: 1:1

BIO-PDF-G: Tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).

BIO-PDF-H: Any fencing used during and after the proposed Project’s construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trashcans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.

Page 3.4-25, revise the final paragraph as follows:

If roosting bats are determined present during the maternity season (April 15 through August 31), the three shall be avoided until after the maternity season, when the young are self-sufficient.

Page 3.4-26, revise the fifth paragraph as follows:

Trees with foliage (and without colonial bat roost potential), such as sycamores, that can support lasiurine bats, shall have the two-step tree trimming process occur over one day under the supervision of a qualified bat biologist. Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. Step 2 would be to remove the remainder of the tree on that same day. For palm trees that can support western yellow bat (a special-status bat species documented in the BSA with the potential to occur in the Project area), the two-step tree process shall be used over two days. Western yellow bats may move deeper within the dead fronds during disturbance. The two-day process will allow the bats to vacate the tree before removal.

SECTION 3.05 CULTURAL RESOURCES

In addition to the general additions and corrections provided above, revise Section 3.05, Cultural Resources, as follows:

Pages 3.5-6 through 3.5-62, revise eleven references to the Chinatown/State Park Station as follows:

Chinatown/State ~~Historic~~ Park Station

Page 3.5-63, revise as follows:

CUL-3: Would the Project disturb any human remains, including those interred outside of formal cemeteries?

Construction Impacts

Less Than Significant Impact With Mitigation. Construction of the proposed Project would require excavation at the Project component sites, which is anticipated to reach a maximum depth of 10 feet, except at the proposed Dodger Stadium Station where the maximum depth would be 42 feet. Piles for the proposed stations, towers, and junction would be drilled to a maximum depth of 125 feet.

Resource 19-001575 is a large multicomponent archaeological site located around LAUS. During the construction of the MWD Headquarters building in 1999, approximately 500 feet southeast of the Area of Direct Impacts, a prehistoric and contact period cemetery included at least 14 internments, 5 cremations, and scatters of human remains as well as associated artifacts were encountered. The resource boundaries are roughly coterminous with the LAUS property boundary. A portion of the Area of Direct Impacts for the proposed Alameda Station overlaps site Resource 19-001575. However, because the Native American cemetery is located approximately 500 feet east of the Area of Direct Impacts, the known cemetery is not anticipated to be impacted by construction. Nonetheless, due to the sensitivity of the area, Mitigation Measure CUL-FD, archaeological testing and data recovery plan for Resource 19-001575, would be prepared and implemented to reduce impacts related to human remains to less than significant.

Additionally, three previously recorded resources (19-001112, 19-004218, 19-167106) within an eighth mile of the Area of Direct Impacts have known cemeteries. None of these resources are located within or adjacent to the Area of Direct Impacts.

The proposed Project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 which requires that work be suspended in the immediate vicinity of the discovery and the Los Angeles County Coroner be contacted. If the remains are deemed to be Native American in origin, the County Coroner will contact the Native American Heritage Commission (NAHC), which will identify a Most Likely Descendant pursuant to PRC Section 5097.98 and CCR Section 15064.5. Work may be resumed at the landowner's discretion, but will only commence after consultation and treatment have been concluded. Work may continue on other parts of the Project while consultation and treatment are conducted. With implementation of Mitigation Measure CUL-D and compliance with the California Health and Safety Code and PRC outlined above, construction impacts related to human remains for the proposed Project would be less than significant.

Page 3.5-64, revise as follows:

CUL-PDF-A Pre-Construction Documentation of The Winery. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for The Winery, per the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation.

Page 3.5-65, revise as follows:

CUL-PDF-C Pre-Construction Documentation. Prior to the issuance of building permits for the Alameda Station, the Project Sponsor will prepare documentation equal to Historic American Building Survey (HABS) Level III for The Winery, per the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation.

Pages 3.5-68 to 3.5-69, revise as follows:

MM-CUL-A: Cultural Resources Monitoring and Mitigation Plan. A Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared for the Project by a qualified archaeologist meeting the Secretary of Interior Standards for Archaeology (36 CFR § 61) prior to construction. Where specific project components, such as the Chinatown/State Park Station, have requirements specific to that component, the CRMMP will lay out regulatory requirements (such as PRC 5024) which will be adhered to. This includes SHPO consultation and following practices that seek to avoid and preserve state-owned historical resources, when prudent and feasible. The same would be for any specific requirement from El Pueblo de Los Angeles specific to the work at the Alameda Station. The General Plan acknowledges the Park has archaeological sensitivities and, as such, recommends continued study of existing and potential resources as well as the need to constantly update and expand the knowledge of historic activities at the Park. As for the cultural resources associated with the Park, the General Plan states that the Park should “[i]dentify, document, evaluate, and interpret cultural resources at the Park,” and “[p]rotect, stabilize, and preserve significant cultural resources within the Park.”

Specifically, the CRMMP shall be applicable to all ground disturbance activities extending into native soils within known archaeological sites and other areas of high sensitivity. Excavations within or within a specified radius of known archaeological sites shall be monitored up to a depth at which the qualified archaeologist determines the base of the archaeological deposit has been reached. The qualified archaeologist shall supervise the archaeological monitor. Monitoring is expected to be required to the maximum depth of planned excavations at the Alameda Station and up to approximately 15 feet in depth at Alameda Tower and the Chinatown/State Park Station. Work will also be monitored by Native American monitors in accordance with Mitigation Measure TCR-A. However, if in the course of excavations the qualified archaeologist determines that the site is disturbed or the sensitivity for significant archaeological resources is low because no resources have been encountered, then monitoring may be reduced or suspended. The monitoring plan shall define pre-construction coordination, construction monitoring for the excavations based on activities and depth of disturbance planned for each Project component (including ground disturbing activities in native soils within known archaeological sites), unanticipated discovery protocols, data recovery (including halting or diverting construction so that archaeological resources can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement (including a curation plan), and reporting. The Project Sponsor shall coordinate with the archaeologist and Metro to develop an appropriate treatment plan for the resources in accordance with California Public Resources Code (PRC) Section 21083.2(i) if they are determined by Metro to be potentially eligible for the CRHR or potentially qualify as unique archaeological resources pursuant to CEQA. Preservation in place is the preferred method of treatment, but if preservation in place is not feasible, t~~reatment may include implementation of archaeological data recovery excavations to remove the resource or preservation in place.~~ Key staff shall be identified, and the process of notification and consultation (where entities specific to each station would be identified) shall be specified within the CRMMP as well as protocols for reporting.

If the discovery proves significant under CEQA and data recovery is the selected means of treatment, the archaeologist shall also be required to curate specimens in a repository with

permanent retrievable storage and submit a written report to the lead agency within a year of completion of the fieldwork. Once complete, the final report shall be filed with the SCCIC.

For Resource 19-004200 and the granite paving (within the Area of Direct Impact of the Project) at Site 19-003120, the CRMMP shall describe the required documentation and treatment of the resources during excavation and potential removal.

MM-CUL-B: Archaeological Resources Worker Training Program. To mitigate unknown historical resources within the Area of Direct Impacts and mitigate potential impacts to them, a qualified archaeologist shall be hired by the Project Sponsor to develop and conduct a worker training program for the Project with input from El Pueblo (as it pertains to the Alameda Station) and LASHP staff (as it pertains to the Chinatown/State Park Station) prior to the start of ground disturbing activities. The training shall be prepared by an archaeologist who meets the Secretary of the Interior's Standards for Archaeology and will be adjusted to the specific details at the two parks. The training shall provide information to construction workers about the known locations of archaeological resources and potential areas that may be sensitive for archaeological resources associated with the Project. Participation in the training by LASHP and El Pueblo staff, will be encouraged. In the event construction crews are phased or rotated, additional training shall be conducted for the new construction workers conducting ground-disturbing activities. The qualified archaeologist shall retain documentation demonstrating that the appropriate construction workers attended the worker training program. An appropriate presentation shall be prepared by a qualified archaeologist which shall describe and illustrate resources likely to be encountered by Project excavation and outline the protocol to be followed in the event of a find. If any archaeological resources are encountered during ground-disturbing activities, work shall be temporarily halted in the vicinity of the find and the Construction Contractor shall contact the qualified archaeologist to examine and evaluate the resource in accordance with the provisions of CEQA as outlined by the CRMMP.

MM-CUL-C: Archaeological Testing Plan for 19-000887 and 19-004320 (Alameda Station). To mitigate impacts to Resources 19-000887 and 19-004320, both of which include portions of the Zanja, an NRHP-eligible archaeological site, and where avoidance is not feasible, an archaeological testing plan and data recovery plan for the Area of Direct Impacts, which is located north of the Placita de Dolores, shall be prepared prior to ground disturbing activities and implemented after the paving is removed. Although the proposed Project is designed to not impact the portion of the Zanja Madre within 19-000887, there is the potential to encounter either previously unrecorded portions of the Zanja or artifact refuse from the overall site. Therefore, a testing plan shall be prepared for the portions of the sites that will be impacted outside of the known Zanja location. Within the Project Area of Direct Impacts, resource 19-000887 overlaps unevaluated resource 19-004320, which will therefore also be included in the testing plan. The testing plan shall be prepared in consultation with El Pueblo de Los Angeles Historical Monument Authority specific to these resources at the Alameda Station.

The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts and contain maps showing the overlap of the sites with the project Area of Direct Impacts. The test excavations are intended to identify the location,

integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria thresholds that would require data recovery. The testing plan shall be implemented once the paving has been removed and far enough in advance of construction for there to be sufficient time to carry out the plan and to prepare a plan for and conduct a data recovery program if needed.

If significant archaeological remains are encountered that appear to contribute to the significance of the overall site during the test excavations and avoidance/preservation-in-place is not feasible, data recovery excavations will be required, and a data recovery plan shall be prepared and implemented. The data recovery plan shall detail the treatment of the surviving archaeological remains, if testing identifies any. The data recovery plan will specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.

MM-CUL-D: Archaeological Testing Plan for LAUS Forecourt. To mitigate impacts to Resource 19-001575, an NRHP-eligible archaeological site, an archaeological testing plan and data recovery plan for the Area of Direct Impacts shall be prepared and implemented prior to ground-disturbing activities. The testing plan shall propose limited archaeological excavations of a portion of the site overlapping the Area of Direct Impacts. The test excavations are intended to identify the location, integrity, and significance of archaeological deposits that may be impacted by the proposed Project. The testing plan shall outline excavation locations and methods, such as where and in what soils mechanical excavations may or may not be used, screen sizes, and the criteria threshold that would require data recovery.

If significant archaeological remains are encountered that appear to contribute to the site's NRHP and CRHR eligibility during the test excavations and avoidance/preservation-in-place is not feasible, data recovery excavations will be required, and the data recovery plan shall be implemented. The data recovery plan shall specify a statistically significant sample of the site to be excavated and shall describe the specific tools, screening size, and methods to be used. The plan shall describe how structural remains, if any, will be exposed and mapped. Laboratory studies planned for the analysis of the finds shall also be described.

Page 3.5-71, revise as follows:

3.5.7 Level of Significance after Mitigation

Upon implementation of Mitigation Measures VIB-A and VIB-B, potentially significant impacts related to the historical resource, the *El Grito (The Cry)* Mural, the Los Angeles Plaza Historic District, and The Winery, would be reduced to less than significant under the proposed Project.

Upon implementation of Mitigation Measures CUL-A through CUL-F, potentially significant impacts related to archaeological resources would be reduced to less than significant under the proposed Project.

Upon implementation of Mitigation Measure CUL-AD, potentially significant impacts related to human remains would be reduced to less than significant under the proposed Project.

SECTION 3.06 ENERGY

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.07 GEOLOGY AND SOILS

In addition to the general additions and corrections provided above, revise Section 3.07, Geology and Soils, as follows:

Page 3.7-8, add the following footnote to the second paragraph:

The fault closest to the Project site is the Elysian Park fault. According to the U.S. Geological Survey Quaternary fault and fold database, the location of the Upper Elysian Park fault is inferred to cross under the alignment.¹⁹ The Upper Elysian Park fault is a north-to-northeast-dipping fault that underlies the northern Los Angeles basin from Griffith Park to Garvey Reservoir. However, the Elysian Park fault is a blind thrust fault, which means it is not capable of surface fault rupture, and therefore is not subject to the conditions of the Alquist-Priolo Act. The Elysian Park thrust fault is considered to be seismogenic (capable of generating earthquakes) from a depth of approximately 2 miles below ground surface in the south-southwest, to approximately 10 miles below ground surface in the north-northeast.

Footnote 19: U.S. Geological Survey, 2020, Quaternary Fault and Fold Database for the Nation, accessed September 2022, at <https://doi.org/10.5066/P9BCVRCK>.

SECTION 3.08 GREENHOUSE GAS EMISSIONS

In addition to the general additions and corrections provided above, revise Section 3.08, Greenhouse Gas Emissions, as follows:

Page 3.8-17, revise the first paragraph as follows:

The Project is proposed to be powered by renewable energy, and provide safe, environmentally friendly, and high-capacity transit connectivity in the Project area. Operation of the proposed Project would result in electricity demand for the aerial gondola system, as well as energy needed for complementary components such as station lighting, restrooms, and escalators. GHG emissions from electricity use are based on anticipated sources of power. The Project would obtain power through renewable electricity from LADWP's Green Power Program, as described in GHG-PDF-A. Renewable electricity sources are assumed to have zero GHG emissions (e.g., the gondola operations would be powered by renewable electricity from LADWP's Green Power Program). Other sources not powered by renewable electricity, such as the electricity usage by the Los Angeles State Historic Park amenities at the Chinatown/State Park Station, would result in a small amount of GHG emissions. These amenities would be operated by the Los Angeles State Historic Park. Additionally, the proposed Project would feature battery storage as a backup power

supply to allow for unloading of the aerial gondola system in the event of a temporary power grid failure, which would require several hours per year of maintenance.

Page 3.8-18, revise the last paragraph as follows:

As described previously, the Project is proposed to be powered by renewable electricity, and provide safe, environmentally friendly, and high-capacity transit connectivity in the Project area. In addition, as noted in Appendix C of the *Los Angeles Aerial Rapid Transit Greenhouse Gas Emissions Technical Report*, the proposed Project would be consistent with all applicable GHG reduction plans, policies, and regulations. Implementation of the proposed Project would result in a net decrease of GHG emissions as an innovative transportation alternative that would reduce VMT and emissions compared to existing conditions. The electrical power for the operation of the proposed Project's aerial gondola system and associated stations, junction, and towers would come from renewable resources as supplied by the LADWP's Green Power Program, as described in GHG-PDF-A. The proposed Project would incorporate energy-efficient features, such as open-air stations and high efficiency lighting. The proposed Project would meet the CALGreen Code to the extent practicable, and would include water-efficient restroom features and drought-tolerant landscaping. In addition, at least 65 percent of the construction waste from the proposed Project will be salvaged for reuse, recycled, or diverted from landfills. The proposed Project would provide transportation alternatives consistent with local, regional, and statewide policies to reduce traffic, air pollution, and GHGs by reducing VMT.

Page 3.8-19, revise sections 3.8.5 through 3.8.7 as follows:

3.8.5 Mitigation Measures-Project Design Feature

GHG-PDF-A: Green Power. Electrical power for the operation of the proposed Project's aerial gondola system and associated stations, junction, and towers would come from renewable resources. The proposed Project shall achieve this through applying to LADWP's Green Power Program or other available LADWP (or equivalent) programs that provide renewable electricity.

3.8.6 Mitigation Measures

The proposed Project would result in less than significant impacts related to GHG emissions. No mitigation measures are required.

3.8.67 Level of Significance after Mitigation

The proposed Project would result in less than significant impacts related to GHG emission.

SECTION 3.09 HAZARDS AND HAZARDOUS MATERIALS

In addition to the general additions and corrections provided above, revise Section 3.09, Hazards and Hazardous Materials, as follows:

Page 3.9-23, revise the fourth paragraph as follows:

This residual contamination may be encountered during excavation and construction activities for the Alameda Station, which has the potential to create a significant hazard to the public or the

environment through the disposal of hazardous materials. Therefore, the proposed Project would implement Mitigation Measure HAZ-A, requiring preparation and submittal to the Los Angeles Department of Building and Safety (LADBS) of a Soil and Groundwater Management Plan, which shall include sampling and analyzing soils and groundwater, and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction of the Alameda Station to less than significant.

Page 3.9-24, revise the first and second paragraphs as follows:

Therefore, the proposed Project would implement Mitigation Measure HAZ-A to prepare and submit to the LADBS a Soil and Groundwater Management Plan, which shall include sampling and analyzing soils/groundwater and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction of the Chinatown/State Park Station to less than significant. Furthermore, it is not anticipated that the groundwater monitoring wells in the Los Angeles State Historic Park property would be restricted during construction activities of the Chinatown/State Park Station; the wells would remain accessible during and after construction activities as required for the RWQCB's annual groundwater monitoring program.

Construction of the Broadway Junction at the 1201 North Broadway property would have a maximum excavation depth of 7 feet bgs and the maximum depth of drilled piles is 120 feet below pile depth. As discussed in Section 3.9.2, Environmental Setting, the 1201 North Broadway property was formerly occupied by an automotive dealership from 1924 until 2003. Previous testing and studies conducted for the 1201 North Broadway site indicate that residual petroleum hydrocarbons may still exist in soils at the 1201 North Broadway property in the area of the former hydraulic lifts and gasoline UST. Excavation or earthwork would occur in the area of the former lifts; therefore, there is potential to encounter contaminated soils during construction activities, which has the potential create a significant hazard to the public or the environment through the disposal of hazardous materials. Therefore, the proposed Project would implement Mitigation Measure HAZ-A to prepare and submit to the LADBS a Soil and Groundwater Management Plan, which shall include sampling and analyzing soils and groundwater, and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction of the Broadway Junction to less than significant.

Page 3.9-30, revise the second paragraph as follows:

The Broadway Junction would be constructed within the 1201 North Broadway property, which is listed in multiple hazardous materials database listings, because the site was formerly occupied by an automotive dealership from 1924 until 2003. As discussed in Threshold HAZ-1, previous testing and studies conducted for the 1201 North Broadway site indicate that residual petroleum hydrocarbons may still exist in soils in the area of the former hydraulic lifts and gasoline UST. Excavation or earthwork would occur in the area of the former lifts; therefore, there is potential to encounter contaminated soils during construction activities, which has the potential create a

significant hazard to the public or the environment through the disposal of hazardous materials. Therefore, the proposed Project would implement Mitigation Measure HAZ-A to prepare and submit to the LADBS a Soil and Groundwater Management Plan, which shall include sampling and analyzing soils and groundwater and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction of the Broadway Junction to less than significant.

Page 3.9-46, revise section 3.9.5, Mitigation Measures as follows:

The proposed Project would implement the following mitigation measures to reduce impacts related to hazards and hazardous materials.

MM HAZ-A Prepare a Soil and Groundwater Management Plan: The Project Sponsor shall retain a qualified environmental consultant to prepare a Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities. The Soil and Groundwater Management Plan would be prepared and implemented to specify methods for handling and disposal in the event contaminated groundwater, contaminated soil, or structures, are encountered during project construction. The Soil and Groundwater Management Plan shall provide a summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater in order to classify them as either hazardous or non-hazardous, and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. Methods and procedures in the Soil and Groundwater Management Plan shall be in accordance with current federal, state, and local regulations and be protective of workers and the environment.

This Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). Contract specifications shall mandate full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater.

SECTION 3.10 HYDROLOGY AND WATER QUALITY

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.11 LAND USE AND PLANNING

In addition to the general additions and corrections provided above, revise Section 3.11, Land Use and Planning, as follows:

Page 3.11-10, revise to add the following after the third paragraph:

El Pueblo de Los Angeles General Plan

The City of Los Angeles signed an agreement in 1953 with the County of Los Angeles and State of California creating El Pueblo State Historic Park. This agreement allowed the State to purchase most of the property comprising the park. In cooperation with the City and County, in 1980, the State prepared the El Pueblo General Plan to provide guidelines for the preservation, rehabilitation, and interpretation of the historic buildings as well as for new development within the park. The purpose of the general plan is to provide general guidelines for management, interpretation, and development of El Pueblo de Los Angeles State Historic Park. In 1992, the property within the Park was transferred to the City; in 1994, a separate department was created, and the name was changed to El Pueblo de Los Angeles Historical Monument (El Pueblo)⁹⁰.

The Land Use and Facilities Element of the El Pueblo General Plan contains the following goals and objectives:

- 1) To unify and coordinate the structures and open spaces to form an entity identifiable as a state historic park.
- 2) To establish a recommended sequence for park development, prioritizing projects and providing specific tools for their implementation.
- 3) To present and interpret the eras and activities of El Pueblo's history within the current physical setting.
- 4) To balance and provide a blend of cultural and commercial services in the park.
- 5) To develop an integrated and comprehensive program of historical interpretation.
- 6) To promote and maintain a special congregating place for Hispanic groups, and for interaction among all ethnic groups.
- 7) To develop a strong connection with other downtown centers.
- 8) To resolve vehicle circulation and parking problems, eliminating conflicts with pedestrians and vehicles in the historic area.
- 9) To create an identifiable park, with clear entrances and orientation, a clear image, and clear boundaries.
- 10) To provide the public with necessary conveniences and services.
- 11) To provide park-like relief against the backdrop of downtown.

The proposed Project’s Alameda Station’s construction activities would occur within the El Pueblo General Plan boundaries. Construction of the proposed Project would involve the installation of circulation elements (i.e., elevators, escalators, stairs) that would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo, in an area currently designated as ROW containing a parking and loading area for El Pueblo. With regard to the area of the El Pueblo General Plan where the proposed Project would be located, the General Plan states:

- 1) The relationship and connection from the Plaza Substation to Placita de Dolores should be studied and improved.
- 2) The transition between the Plaza and Placita de Dolores needs special design attention.
- 3) To successfully relate El Pueblo to Union Station [Los Angeles Union Station, LAUS], pedestrian crossings should be studied.
- 4) Improvements to Placita de Dolores for expanded function, landscaping, and connections with other site areas are recommended. This should be coordinated with the development of the Plaza Substation and its facade restoration, as well as with the designs for possible connection to Union Station.
- 5) Strong design relationships should be established between the Plaza, Placita de Dolores, Father Serra Park, and possible linkage to Union Station.⁹¹

Footnote 90: El Pueblo de Los Angeles State Historic Park General Plan, California Department of Parks and Recreation. August 1981.

Footnote 91: City of Los Angeles, 1980, El Pueblo General Plan.

Page 3.11-37, revise the second paragraph as follows:

Additionally, the proposed Project would include a number of pedestrian enhancements and a mobility hubs that would provide new multi-modal connection options. ~~For instance,~~ Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements at this location could include pedestrian improvements between Metro’s L Line (Gold) Station and the Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. ~~Additionally, the Project Sponsor will request a program with the Los Angeles Dodgers on the potential for the Dodger Stadium Station would to include a mobility hub where passengers would be able to access first and last mile multi-modal options to access Elysian Park and other nearby neighborhoods, including Solano Canyon. The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for~~ Consideration as to the mobility hub include securing Dodger Stadium and the surrounding surface parking areas. Dodger Stadium Station would also include a pedestrian connection.

Page 3.11-44, revise the second paragraph in Table 3.11-2 as follows:

~~Additionally, the Project Sponsor will request a program with the Los Angeles Dodgers on the potential for the Dodger Stadium Station~~ will ~~to include a mobility hub where passengers would be able to access first and last mile multi-modal options to access Elysian Park and other nearby neighborhoods, including Solano Canyon.–The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for~~ Consideration as to the mobility hub include securing Dodger Stadium and the surrounding surface parking areas. Dodger Stadium Station would also include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating. Dodger Stadium draws large regional crowds, with approximately 100 baseball games and other events each year.

Page 3.11-45, revise the second paragraph in the “Goal 4” row of Table 3.11-2 as follows:

~~Additionally, the Project Sponsor will request a program with the Los Angeles Dodgers on the potential for the Dodger Stadium Station~~ will ~~to include a mobility hub where passengers would be able to access first and last mile multi-modal options to access Elysian Park and other nearby neighborhoods, including Solano Canyon.–The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for~~ Consideration as to the mobility hub include securing Dodger Stadium and the surrounding surface parking areas. Dodger Stadium Station would also include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating.

Page 3.11-49, revise the second paragraph of Table 3.11-3 as follows:

~~Additionally, the Project Sponsor will request a program with the Los Angeles Dodgers on the potential for the Dodger Stadium Station~~ will ~~to include a mobility hub where passengers would be able to access first and last mile multi-modal options to access Elysian Park and other nearby neighborhoods, including Solano Canyon.–The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for~~ Consideration as to the mobility hub include securing Dodger Stadium and the surrounding surface parking areas.

Page 3.11-55, revise the paragraph in the “Goal 10” row of Table 3.11-3 as follows:

~~Additionally, the Project Sponsor will request a program with the Los Angeles Dodgers on the potential for the Dodger Stadium Station~~ will ~~to include a mobility hub where passengers would be able to access first and last mile multi-modal options to access Elysian Park and other nearby neighborhoods, including Solano Canyon.–The Project Sponsor would coordinate with the Los Angeles Dodgers on maintaining security for~~ Consideration as to the mobility hub include securing Dodger Stadium and the surrounding surface parking areas.

Page 3.11-61, add the following before the “Specific Plan Areas” heading:

El Pueblo General Plan

The proposed Project’s Alameda Station’s construction activities would occur within the El Pueblo General Plan boundaries. Construction of the proposed Project would involve the installation of

circulation elements (i.e., elevators, escalators, stairs) that would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo. El Pueblo currently attracts many visitors to its many historic features, including Olvera Street, which is a pedestrian-oriented marketplace containing restaurants, craft shops, and other retail businesses reflecting the Mexican heritage of the City. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street. The Alameda Station location was selected because of its high visibility and proximity to LAUS and El Pueblo, safe and convenient pedestrian connection to and from the LAUS passenger terminal and El Pueblo, as well as adjacency to public space for passenger access. In addition, the proposed Project would provide an intermediate station at the southernmost entrance at the Los Angeles State Historic Park, providing access to Chinatown and the Los Angeles State Historic Park, consistent with the El Pueblo General Plan’s aim to study connections to Chinatown from El Pueblo.⁹²

The proposed Project would be consistent with the goals and objectives of the El Pueblo de Los Angeles General Plan as discussed below in Table 3.11-7.

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

<u>Goals and Objectives</u>	<u>Consistency Discussion</u>
<p><u>1. To unify and coordinate the structures and open spaces to form an entity identifiable as a state historic park.</u></p>	<p><u>Consistent.</u> <u>Operation of the proposed Project would not impede existing accessible areas or visitor uses or activities within the El Pueblo General Plan area, but rather would provide a new pedestrian plaza at El Pueblo, encouraging visitors to El Pueblo, which would help unify and coordinate the area’s structures and open spaces. The proposed Project, as a first/last mile transit connection, would provide a link to and from the open and public spaces at El Pueblo and LAUS to other such open spaces along the alignment, including the Los Angeles State Historic Park, Elysian Park, and other pedestrian-oriented areas of Chinatown. With Metro’s existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, the proposed Project provides the opportunity for anyone in the Los Angeles County region to access El Pueblo. Rather than proposing a single uniform color palette for the entire system, colors for the material finishes at each station and junction will be selected to be complementary to each of their respective sites and surrounding urban fabric. In addition, each station including Alameda Station would provide an</u></p>

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
	<p><u>opportunity for site specific artwork that is reflective of the unique neighborhood culture that could be commissioned from local artists. Therefore, the proposed Project would be consistent with this goal/objective.</u></p>
<p><u>2. To establish a recommended sequence for park development, prioritizing projects and providing specific tools for their implementation.</u></p>	<p><u>This goal/objective is not applicable to the proposed Project. Nevertheless, the proposed Project would not impede development in the El Pueblo General Plan Area, as construction of the proposed Project within the Plan boundaries would only involve the installation of circulation elements (i.e., elevators, escalators, stairs) that would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo.</u></p>
<p><u>3. To present and interpret the eras and activities of El Pueblo’s history within the current physical setting.</u></p>	<p>Consistent. <u>The Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. The goal of this interpretation plan is to develop a program that would provide all riders with an engaging and informative experience that would enhance their understanding and appreciation of the culture and history of the adjacent neighborhoods, including El Pueblo. Therefore, the proposed Project would be consistent with this goal/objective.</u></p>
<p><u>4. To balance and provide a blend of cultural and commercial services in the park.</u></p>	<p>Consistent. <u>The proposed Project would provide numerous benefits to local businesses in the El Pueblo area. In addition to providing accessible and affordable mobility options for these businesses’ employees and area residents, the proposed Project would create economic opportunities for potential partnerships with these businesses. The proposed Project could partner, for example, with El Paseo Inn Restaurant and the Olvera Street Merchants to help in addressing visitor, educational, and customer access to these businesses. The proposed Project includes other features to enhance and provide additional benefit to the surrounding community, including but not limited to, sustainability features and open space enhancements, the Community Access Plan for fares, access to parks, mobility hubs,</u></p>

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

<u>Goals and Objectives</u>	<u>Consistency Discussion</u>
	<p><u>signage, utilization of local artists for site specific artwork at each station reflective of the unique neighborhood culture, design of each component of the proposed Project to complement and reflect the unique character of the surrounding neighborhood, the Business and Community Support Program during construction, and benefits to local businesses along the proposed Project alignment. In addition, to reflect the diversity of Los Angeles, the Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community.</u></p> <p><u>The proposed Project would provide links to and from El Pueblo and the LAUS transit hub via Alameda Station, capitalizing on opportunities to connect the area around the Alameda Station to other local and regional transit opportunities, historic resources, and cultural facilities along the Project alignment, including Chinatown and the Los Angeles State Historic Park, as well as Dodger Stadium, thereby increasing access to existing commercial and cultural uses. In addition, with Metro’s existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, the proposed Project provides the opportunity for anyone in the Los Angeles County region to access El Pueblo. Therefore, the proposed Project would be consistent with this goal/objective.</u></p>
<p><u>5. To develop an integrated and comprehensive program of historical interpretation.</u></p> <p><u>6. To promote and maintain a special congregating place for Hispanic groups, and for interaction among all ethnic groups.</u></p>	<p>Consistent. <u>The Project Sponsor would convene stakeholder groups to identify unique ways to use the proposed Project to provide additional interpretation of the adjacent neighborhood culture and history, particularly aimed at a diverse visitor community. The goal of this interpretation plan is to develop a program that would provide all riders with an engaging and informative experience that would enhance their understanding and appreciation of the culture and history of the adjacent neighborhoods, including El</u></p>

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
	<p><u>Pueblo. Accordingly, the proposed Project would support the goal of developing a comprehensive program of historical interpretation. In addition, the proposed Project would provide links to and from El Pueblo and the LAUS transit hub via Alameda Station, capitalizing on opportunities to connect the area around the Alameda Station to other local and regional transit opportunities, historic resources, and cultural facilities along the proposed Project alignment, including Chinatown and the Los Angeles State Historic Park, as well as Dodger Stadium, a regional event center. With Metro’s existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, the proposed Project provides the opportunity for anyone in the Los Angeles County region to access El Pueblo. In addition, each station, including Alameda Station, could also provide an opportunity for site specific artwork that is reflective of the unique neighborhood culture and could be commissioned from local artists. Therefore, the proposed Project would be consistent with these goals/objectives of developing a historical interpretation program and promoting and maintaining a special congregating place for Hispanic groups, and for interaction among all ethnic groups.</u></p>
<p><u>7. To develop a strong connection with other downtown centers.</u></p>	<p>Consistent. <u>The proposed Project would develop a strong connection between El Pueblo and other downtown centers through providing an ART system within urbanized downtown Los Angeles. The proposed Project would provide direct linkages for existing residents and communities to various areas of downtown Los Angeles, including El Pueblo (and the Los Angeles Plaza Park, Placita de Dolores, and the adjacent Olvera Street); Los Angeles State Historic Park; Dodger Stadium; and Elysian Park.</u></p> <p><u>The proposed Project would provide a connection to and from El Pueblo via Alameda Station, providing new and enhanced connections from the El Pueblo area with downtown areas including LAUS, Dodger Stadium, the</u></p>

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
	<p><u>Chinatown/State Park and other local transit lines along the Project alignment and the regional transit system. Additionally, the Alameda Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. By providing expanded transit access to neighborhoods and activity centers, the proposed Project would provide additional opportunities for recreational use for a broad cross-section of visitors and the surrounding neighborhoods. Therefore, the proposed Project would be consistent with this goal/objective.</u></p>
<p><u>8. To resolve vehicle circulation and parking problems, eliminating conflicts with pedestrians and vehicles in the historic area.</u></p>	<p>Consistent. <u>The proposed Project would provide a proven, safe, zero emission, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector between LAUS, El Pueblo and Dodger Stadium. At Alameda Station, the proposed Project would install circulation elements (i.e., elevators, escalators, stairs) that would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo, in an area currently designated as ROW containing a parking and loading area for El Pueblo. The proposed Project’s pedestrian network improvements would assist in minimizing circulation challenges by facilitating multi-modal access to and from both the proposed Project’s Alameda Station and LAUS, while also replacing an existing parking lot with pedestrian improvements to further eliminate conflicts with pedestrians and vehicles in the area. The proposed Project would include multilingual signage to support wayfinding for transit passengers, including information about transit connections and other important information to facilitate transit usage, as well as directional and pedestrian signage adjacent to and throughout the proposed Project as necessary to facilitate access and safety, which would be illuminated in conformance with all applicable requirements of the Los Angeles Municipal Code. As described further in Section 3.17, Transportation, the proposed Project would</u></p>

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
	<p>not substantially increase hazards (e.g., vehicle, pedestrian, and bicycle safety hazards) due to a geometric design feature or incompatible use with implementation of mitigation, and therefore would not result in conflicts with pedestrians and vehicles in the area. In addition, the proposed Project would include a parking management plan prepared in collaboration with the City, who would implement any on-street parking management strategies, and with robust feedback from community stakeholders to inform development of the plan. Therefore, the proposed Project would be consistent with this goal/objective.</p>
<p>9. <u>To create an identifiable park, with clear entrances and orientation, a clear image, and clear boundaries.</u></p>	<p>Consistent. The proposed Project would integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the proposed pedestrian plaza at El Pueblo. The Alameda Station’s platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. In addition, the “shell” roof design provides a visual lightness with an integrated perforation pattern motif based upon the arched forms that mark openings and entries to Union Station, Pico House, and other historic buildings within El Pueblo.</p> <p>The proposed Project’s new pedestrian plaza at El Pueblo assists with this goal by creating a new, identifiable pedestrian entry point to El Pueblo in an area that currently contains a parking and loading area for El Pueblo. The proposed Project’s signage would provide directional and pedestrian signage placed adjacent to and throughout the proposed Project to facilitate access and safety, including at Alameda Station adjacent to El Pueblo, to improve wayfinding. Therefore, the proposed Project would be consistent with this goal/objective.</p>

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
<p>10. To provide the public with necessary conveniences and services.</p>	<p>Consistent. The proposed Project would provide a proven, safe, zero emission, sustainable, high-capacity, and highly efficient form of transportation that would function as both a reliable rapid transit system and first/last mile connector between the activity centers at LAUS, El Pueblo and Dodger Stadium, the Los Angeles State Historic Park, Elysian Park, Echo Park, and Solano Canyon, thus providing the public with an additional transit option in the area. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, and would therefore enhance access to El Pueblo and promote and further attract visitors to Olvera Street. Therefore, the proposed Project would be consistent with this goal/objective.</p>
<p>11. To provide park-like relief against the backdrop of downtown.</p>	<p>Consistent. The Alameda Station’s platform and canopy would include a light color scheme and warm tones, which has been designed to complement and reflect the materiality of the existing mix of adobe buildings, large Victorian commercial blocks, and Spanish Revival style buildings within the El Pueblo and Olvera Street area. The proposed Project would integrate physical and visual connections between the proposed Alameda Station and existing adjacent development, such as the new pedestrian plaza at El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would enhance visitor use and experiences within this area. Therefore, the proposed Project would be consistent with this goal/objective.</p>
<p>Policies Related to the Proposed Project Location within the El Pueblo General Plan</p>	
<ul style="list-style-type: none"> • The relationship and connection from the Plaza Substation to Placita de Dolores should be studied and improved. • The transition between the Plaza and Placita de Dolores needs special design attention. 	<p>The majority of these policies are related to the development of the El Pueblo General Plan which was developed in 1980 and are not applicable to the proposed Project. Nevertheless, the proposed Project would be supportive of these goal/objectives. The proposed Project would integrate physical and visual connections between the proposed new Alameda Station and El Pueblo. The new pedestrian plaza at El Pueblo would be open to the public and would enhance visitor use and experiences within this area, and would improve the</p>

Table 3.11-7: Project Consistency with Applicable El Pueblo de Los Angeles General Plan Goals and Objectives

Goals and Objectives	Consistency Discussion
<ul style="list-style-type: none"> • <u>To successfully relate El Pueblo to Union Station [Los Angeles Union Station, LAUS], pedestrian crossings should be studied.</u> • <u>Improvements to Placita de Dolores for expanded function, landscaping, and connections with other site areas are recommended. This should be coordinated with the development of the Plaza Substation and its facade restoration, as well as with the designs for possible connection to Union Station.</u> • <u>Strong design relationships should be established between the Plaza, Placita de Dolores, Father Serra Park, and possible linkage to Union Station.</u>⁹³ 	<p><u>relationship and connection from the Plaza Substation to Placita de Dolores and assist with the transition between the Plaza and Placita de Dolores. With Metro’s existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, the proposed Project provides the opportunity for anyone in the Los Angeles County region to access El Pueblo, expanding visitor uses, and would also connect any passenger of the ART system to Dodger Stadium, a regional event center. In addition, the proposed Project is designed to be consistent with Metro’s LAUS Forecourt and Esplanade Improvements Project, which involves repurposing the existing northwestern parking lot at LAUS into a pedestrian forecourt and gathering space, as well as pedestrian and bicycle enhancements along Alameda Street and Los Angeles Street. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo, enhancing access to El Pueblo and promoting and further attracting visitors to Olvera Street. Accordingly, in conjunction with the LAUS Forecourt and Esplanade Improvements Project, the proposed Project’s pedestrian improvements would assist with pedestrian crossings in order to relate El Pueblo to LAUS. Therefore, the proposed Project would be consistent with these goals/objectives.</u></p>

Source: California State Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 2005.

Footnote 92: El Pueblo General Plan, p. 59.

Footnote 93: City of Los Angeles, 1980, El Pueblo General Plan.

SECTION 3.12 MINERAL RESOURCES

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.13 NOISE

In addition to the general corrections and additions provided above, revise Section 3.13, Noise, as follows:

Pages 3.13-72 to 3.13-43, revise Mitigation Measure VIB-A as follows:

VIB-A: Vibration Monitoring: Prior to the issuance of grading permits for the proposed Project, the Project Sponsor shall design a Vibration Monitoring Plan. The Plan shall provide for:

- Vibration Monitoring Equipment: the placement of vibration monitoring equipment ~~at least~~ approximately 26 feet away from the Avila Adobe (1970s addition), El Grito mural wall, and The Old Winery by a qualified professional for real-time vibration monitoring for construction work at the Alameda Station requiring heavy equipment or ground compaction devices.
- Modification of Vibration Equipment: the monitoring devices shall notify the construction crew if vibration levels are within 0.1 PPV, in/sec, of the vibration damage threshold. The construction crew shall modify the construction equipment to ensure that the vibration damage threshold is not exceeded.

SECTION 3.14 POPULATION AND HOUSING

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.15 PUBLIC SERVICES

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.16 PARKS AND RECREATIONAL FACILITIES

In addition to the general additions and corrections provided above, revise Section 3.15, Parks and Recreational Facilities, as follows:

Page 3.16-16, revise the last paragraph as follows:

Construction of the Chinatown/State Park Station would temporarily fence off portions of the park, generate dust and noise, and introduce heavy construction equipment into the area, which may potentially discourage people from using certain portions of the park, disrupt events occurring at the park, or increase the use of the open portions of the park. The proposed Project does not propose to demolish, nor does it need to demolish the Cargo Snack Shack concession or restrooms during construction; however, the Project Sponsor would coordinate with State Parks and the concessionaire on the potential to provide alternative seating locations during construction. In addition, during one of the final phases of construction, the overhead ropeway cables of the ART system would be installed, which would require a brief and temporary closure of the southernmost corner and western edge of the Los Angeles State Historic Park beneath the cables for safety purposes. However, other options for pedestrian access, including the provision of pedestrian detours during construction, would allow for continued pedestrian access within the Project area. In the location of the Chinatown/State Park Station, a covered pedestrian sidewalk on the roadway would be provided to maintain pedestrian access during all phases of construction, with the exception of 10 nonconsecutive days of asphalt/restripping that would occur on the existing southbound parking lane. In addition, the eastern sidewalk on Spring Street would remain open for pedestrian access at all times.

Page 3.16-26, revise the second sentence of the second paragraph as follows:

As described in PR-1, construction of the Chinatown/State Park Station would require the temporary closure of approximately 22 acres of the southern entrance to Los Angeles State Historic Park and the southernmost corner and western edge of the park during cable installation.

Page 3.16-21, revise the third paragraph as follows:

The proposed Project would include a ~~potential~~ mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first- and last-mile multi-modal options, and connections to Elysian Park and adjacent neighborhoods. The ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would have the ~~potential~~ effect of increasing transit accessibility and non-motorized transportation options to Elysian Park as users of the proposed ART system would be able to access the park from the terminus at Dodger Stadium Station. Implementation of the ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would support the goal of the Silver Lake-Echo Park-Elysian Park Community Plan to create links for existing residents of the plan area to existing facilities in the City to expand their recreational opportunities. However, the proposed Project would not change the existing use and capacity of Elysian Park as the park is the second largest park in the City of Los Angeles, spanning 575 acres. It is not anticipated that operation of the proposed Project would result in substantial physical deterioration of the Elysian Park by providing access to the park, as the park is underutilized and the proposed Project does not propose housing units that would otherwise increase the population of the area. Instead, the proposed Project would improve the mobility and accessibility for people in the area by providing an ART option, in accordance with several community plans, including the City of Los Angeles General Plan, Silver Lake-Echo Park-Elysian Park Community Plan, and Metro's Transit to Parks Strategic Plan, to increase access to the park. Therefore, the proposed Project would not increase the use of Elysian Park to the extent that substantial physical deterioration of the facility would occur or be accelerated, and the operational impact would be less than significant impacts.

Page 3.16-24, revise the last paragraph as follows:

The Dodger Stadium Station would ~~potentially~~ include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, and connections to Elysian Park and adjacent neighborhoods. As described above, the ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would have the beneficial effect of increasing transit accessibility and non-motorized transportation options to Elysian Park as users of the proposed ART system would be able to access the park from the terminus at Dodger Stadium Station. Implementation of the ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would support the goal of the Silver Lake-Echo Park-Elysian Park Community Plan to create links for existing residents of the plan area to existing facilities in the City to expand their recreational opportunities. However, the proposed Project would not create or expand the existing use and capacity of Dodger Stadium or Elysian Park. The ~~potential~~ mobility hub and connections to Elysian Park and adjacent neighborhoods would be located within the boundaries of Dodger Stadium parking lot. Therefore, operational impacts of Dodger Stadium Station related

to the construction of expansion of recreational facilities which might have an adverse physical effect on the environment would be less than significant.

Page 3.16-29, revise the first full paragraph as follows:

Operation of Dodger Stadium Station would not require the provision of new or physically altered government facilities (i.e., parks), or need for new or physically altered parks. The proposed Project would ~~potentially~~ provide a mobility hub at Dodger Stadium Station, where passengers would be able to access a suite of first- and last-mile multi-modal options, including a bike share program and individual bike lockers, and connections to Elysian Park and adjacent neighborhoods. As such, the proposed project would result in beneficial impacts related to Elysian Park. Elysian Park is located in the Silver Lake-Echo Park-Elysian Park Community Plan Area. One of the goals of the Community Plan is to provide/ensure access to new recreational resources and open space developed throughout the Plan area, including trails and facilities along the Los Angeles River, and new parks. The proposed Project would improve the mobility and accessibility for existing residents and communities in the area by providing direct linkages to major residential, employment, and tourist destinations, such as LAUS, El Pueblo/Olvera Street, Chinatown, Los Angeles State Historic Park, and Dodger Stadium. Therefore, operation of Dodger Stadium Station would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks, need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives, and the impact would be less than significant.

SECTION 3.17 TRANSPORTATION

In addition to the general additions and corrections provided above, revise Section 3.17, Transportation, as follows:

Page 3.17-26, revise the first paragraph as follows:

The proposed Project would provide fixed route transit service to several neighborhoods including Chinatown, Mission Junction, Elysian Park and Solano Canyon, and to destinations around the Los Angeles State Historic Park. Ridership for neighborhood riders was estimated by calculating the working-age people and jobs within a half-mile walking-distance of each proposed station based on a street network analysis. ~~The proposed Project would~~ Sponsor will request a program with the Los Angeles Dodgers on the potential for the Dodger Stadium Station to include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options; accordingly, a one-mile biking distance for the Dodger Stadium Station was chosen for the evaluation of the Dodger Stadium Station since the ~~potential~~ mobility hub would facilitate safe and convenient connections to Elysian Park and Solano Canyon, which are beyond a half-mile walking distance. The American Community Survey and the Longitudinal Employer-Household Dynamics of the United States Census was used to calculate the population and jobs respectively within the station catchment areas.

Page 3.17-39, revise the first paragraph as follows:

Less than Significant Impact with Mitigation. Per the City of Los Angeles TAG, construction impacts are not considered to be part of the CEQA analysis, and so are included for informational purposes. Nonetheless, Project construction would introduce lane closures and closed worksites within City streets for construction activities, such as foundations and steel erection. Construction worksites would be fenced, and lane closures and associated lane tapers, temporary advance warning signs, detour signs, etc., would be implemented in accordance with the California MUTCD and LADOT requirements to ensure that no significant temporary geometric design hazards are introduced during the construction period after mitigation. Construction of the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible use with implementation of Mitigation Measure TRA-B, as presented in Section 3.17.56, Mitigation Measures, below. As these features are constructed, Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below would be implemented concurrently to ensure that these impacts would be less than significant during construction.

Page 3.17-40, revise the first paragraph as follows:

No pedestrian crossings would occur across City streets via this connection. One driveway crossing would be along this pedestrian connection. Enhancements to this driveway crossing are detailed under Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below. Therefore, the proposed Project would not hinder pedestrian access or crossings. In order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would also incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 3.17-41, revise the fourth paragraph as follows:

Implementation of the visibility enhancements described under Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below, primarily by implementing westbound no right turn on red restrictions would alleviate potential visibility issues associated with operation of the Alameda Tower by prohibiting vehicles from making a ~~westbound~~ right turn on red from westbound Alhambra Avenue to northbound Alameda Street. With implementation of Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below, impacts would be less than significant.

Page 3.17-42, revise the second paragraph as follows,

Because the columns would be set back from the roadway, pedestrians crossing in the crosswalk across the existing driveway immediately south of the Los Angeles State Historic Park would be fully visible to vehicles turning into the existing driveway, and no sight distance obstructions would be present. Vehicles exiting the driveway would have full view of pedestrians crossing without obstructions. Pedestrians who cross outside of the crosswalk to the west of the columns could be obstructed by the columns for motorists travelling southbound on Spring Street making a right turn into the driveway. While there is an existing paved pathway behind the proposed

column locations north of the driveway to access the Los Angeles State Historic Park, south of the driveway is a parking drive aisle of the Capital Milling property. Pedestrians are unlikely to cross in that location, because there would not be a sidewalk to cross onto south of the driveway. However, to further limit the potential for pedestrians to cross behind the columns, implementation of the visibility enhancements described under Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below, including the implementation of an operational strategy in coordination with State Parks to prevent pedestrians from crossing the driveway west of the columns and channelization of pedestrians to the crosswalk, would alleviate potential visibility issues associated with operation of the Chinatown/State Park Station by preventing pedestrians from crossing behind the columns where they would not be visible to motorists. With implementation of Mitigation Measure TRA-A, impacts would be less than significant. Nevertheless, in order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 3.17-43, revise the last paragraph as follows:

The section above details the Project components and their potential to affect vehicle, pedestrian, and bicycle visibility, which is the primary way that the Project could negatively impact transportation conditions. Though as detailed above, visibility enhancements have been proposed under Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below, at the Alameda Tower and Chinatown/State Park Station to reduce the potential for impact to less than significant.

Page 3.17-44, revise the first sentence of the fifth paragraph as follows:

The proposed Project's junction and towers would not introduce any unsafe physical conditions with the implementation of Mitigation Measure TRA-A, as presented in Section 3.17.56, Mitigation Measures, below, which would be implemented at the Alameda Tower and the Chinatown/State Park Station.

Page 3.17-58, revise the last sentence of the fourth paragraph as follows:

Nonetheless, implementation of a Construction Traffic Management Plan, as outlined in Mitigation Measure TRA-B, as presented in Section 3.17.56, Mitigation Measures, below, would be required to ensure adequate emergency access is maintained in and around the Project alignment and component sites throughout all construction activities to ensure that the impact is less than significant with mitigation incorporated.

Page 3.17-66, revise the seventh paragraph as follows:

Implementation of Mitigation Measure TRA-C, as presented in Section 3.17.56, Mitigation Measures, below, includes the identification of temporary disaster routes during construction and other traffic handling measures during a disaster, would be required. With implementation of Mitigation Measures TRA-B and TRA-C, as presented in Section 3.17.56, Mitigation Measures, below, construction impacts would be less than significant.

Page 3.17-67, revise sections 3.17.5 and 3.17.6 as follows:

3.17.5 Project Design Feature

TRA-PDF-A Additional Visibility Enhancements: Subject to the approval of the Los Angeles Department of Transportation, as a best practice to further enhance pedestrian visibility at the Chinatown/State Park Station, stripe a high visibility crosswalk and add upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

3.17.56 Mitigation Measures

MM TRA-A **Visibility Enhancements:** Prior to the completion of construction of the proposed Project, and in coordination with and subject to the approval of LADOT, the Project Sponsor shall design the following visibility enhancements at for the following locations sufficient to alert drivers to the presence of pedestrians:

- Alameda Tower – Implement a no right turn on red restriction to prohibit vehicles from making a right turn on red from westbound Alhambra Avenue to northbound Alameda Street.
- Chinatown/State Park Station – Implement an operational strategy or design to channelize pedestrians walking from the Los Angeles State Historic Park to the crosswalk across the existing driveway south of the Park to prevent pedestrians from crossing the driveway west of columns supporting the Chinatown/State Park Station to ensure crossings occur in the crosswalk where visibility is sufficient. The ultimate design or operational method of channelization (such as station staff directing pedestrians towards the crosswalk or a physical method such as a gate) would be coordinated with State Parks.

~~Visibility enhancement features could include high visibility crosswalk treatments, advanced crossing warning signs, flashing beacons, upgraded lighting, and new or upgraded traffic controls, such as traffic signals and all-way stops and right turn on red restrictions and channelization of pedestrians to marked crosswalk locations via fencing. The mitigation measure would be implemented during the construction phase and would be completed prior to proposed Project operations.~~

MM TRA-B **Construction Traffic Management Plan:** Prior to the issuance of a building permit for the proposed Project, a detailed Construction Traffic Management Plan (CTMP), including street closure information, detour plans, haul routes, and a staging plan, shall be prepared and submitted to the City for review and approval. The CTMP shall formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CTMP shall be based on the nature and timing of the specific construction activities at each of the Project construction sites. This coordination

will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the proposed Project. The CTMP may be updated as construction progresses to reflect progress at the various Project construction sites. The CTMP will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane, and sidewalk closures are anticipated, worksite traffic control plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Visibility to open pedestrian crossings will be maintained, or temporary or permanent measures consistent with Mitigation Measure TRA-A shall be implemented if determined to be appropriate in coordination with LADOT. In absence of measures to mitigate or eliminate visual obstructions for pedestrians crossing the street, pedestrian crossings may be closed or relocated to more visible locations.
- Existing school crossings, as denoted by yellow crosswalk striping consistent with the Manual on Uniform Traffic Control Devices (MUTCD) along proposed detour routes shall be evaluated in coordination with LADOT to determine if crossing guards should temporarily be assigned. If it is determined that crossing guards should be assigned, on days/times when detours are active, the proposed Project shall fund crossing guards during morning school arrival and afternoon school departure periods during periods when adjacent schools are in session. If school crossings along detour routes are unsignalized, temporary traffic signals will be evaluated in coordination with LADOT and would be implemented by the proposed Project if deemed necessary.
- As partial and full street closures are anticipated at various locations during portions of the Project construction, detour plans, approved by the City of Los Angeles, shall be developed and implemented to route vehicular traffic and bicyclists to alternative routes during these periods.
- Ensure that access will remain accessible for land uses in proximity to the Project alignment and component sites during project construction. In some cases, alternative access locations would be provided or supervised temporary access through the worksite would be accommodated during construction phases where access is hindered, such as foundation construction.
- Coordinate with the City and emergency service providers to ensure emergency access is provided to the Project alignment and component sites and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

- Conduct bi-monthly 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 ~~bimonthly~~, or as otherwise determined appropriate by City Staff.
- Provide off-site truck staging in a legal area furnished by the construction truck contractor.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- During construction activities when construction worker parking cannot be accommodated at the Project component sites, identify alternate parking location(s) for construction workers and the method of transportation to and from the Project component sites (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.
- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.

Page 3.17-69, revise section 3.17.6 as follows:

3.17.6~~7~~ Level of Significance After Mitigation

SECTION 3.18 TRIBAL CULTURAL RESOURCES

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 3.19 UTILITIES AND SERVICE SYSTEMS

In addition to the general additions and corrections provided above, revise Section 3.19, Utilities and Service Systems, as follows:

Page 3.19-21, revise the fifth paragraph as follows:

Additionally, operation of the proposed Project would require connections to the LADWP power grid through installation of permanent, underground power lines to connect conduit from the proposed Project to existing underground electrical vaults in order to operate the gondola system and the non-gondola system components (i.e., lights, ventilation, escalators, elevators). It is estimated that the Aerial Rapid Transit (ART) system would require a total estimated power requirement of approximately 2.5 MW to operate the entire gondola system and other station functions such as elevators, escalators, and heating, ventilation, and air conditioning system. The electrical power for the operation of the proposed Project would be supplied by the LADWP through the utility's Green Power Program, as described in GHG-PDF-A in Section 3.8, Greenhouse Gas Emissions. Accordingly, the primary electricity usage associated with the Project would come

from renewable resources, and it is anticipated that the existing power supply provided for the proposed Project would be sufficient for Project operation. Therefore, it is not anticipated that operation of the proposed Project would result in the construction of new or expanded electric power facilities. For a detailed description of energy demand and conservation, refer to Section 3.6, Energy of this Draft EIR.

SECTION 3.20 WILDFIRE

In addition to the general corrections and additions provided above, revise Section 3.20, Wildfire, as follows:

Page 3.20-30, revise the last full paragraph as follows:

It is noted that the proposed Project would implement Mitigation Measure TRA-3C, requiring the development of a Project-specific temporary disaster route plan prior to the start of construction, as described in Section 3.17, Transportation, which would further support coordination with local authorities during an emergency event. The temporary disaster route plan would require coordination with and approval of the plan by LADOT, which would include street closure information and detour plans. In addition to detours, the temporary disaster route plan could also include temporary operational measures that would be implemented by the City during a disaster, including temporary contra-flow lanes or reversing directions to flush vehicles during a disaster situation.

SECTION 4.0 ALTERNATIVES

In addition to the general additions and corrections provided above, revise Section 4.0, Alternatives, as follows:

Page 4-1, revise Section 4.1.1, Project Impacts, as follows:

Based on the environmental analysis conducted for the proposed Project, significant impacts requiring mitigation have been identified for:

- Section 3.4, Biological Resources
- Section 3.5, Cultural Resources
- Section 3.7, Geology and Soils
- Section 3.9, Hazards and Hazardous Materials
- Section 3.11, Land Use and Planning
- Section 3.13, Noise
- Section 3.15, Public Services
- Section 3.17, Transportation
- Section 3.18, Tribal Cultural Resources
- Section 3.19, Utilities and Service Systems
- ~~Section 3.20, Wildfire~~

The Draft EIR identifies less than significant impacts for:

- Section 3.1, Aesthetics
- Section 3.2, Agriculture and Forestry Resources

- Section 3.3, Air Quality
- Section 3.6, Energy
- Section 3.8, Greenhouse Gas Emissions
- Section 3.10, Hydrology and Water Quality
- Section 3.14, Population and Housing
- Section 3.16, Parks and Recreation
- Section 3.20, Wildfire

Page 4-6, revise the second paragraph as follows:

4.1.3.5 Objective 5: Reduce Transportation Related Pollution and GHG Emissions

The proposed Project and Spring Street Alignment Alternative would meet this objective by providing an ART system that would provide safe, zero emission, and high-capacity transit connectivity. Current vehicular emissions associated with events at Dodger Stadium result from passengers in vehicles traveling to the game along with employees (i.e., total Vehicle Miles Traveled (VMT)). By transitioning the passengers of these vehicles to the proposed Project or Spring Street Alignment Alternative, total VMT would be reduced along with corresponding reductions in transportation related pollution and GHG emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The TSM Alternative would moderately meet this objective, because while more passengers would transition from private vehicles to DSE buses, which could potentially be electrified in the future, the TSM Alternative would still operate vehicles on the roadway, thereby contributing to VMT and some congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. The No Project Alternative would not meet this objective, as it would not reduce vehicular congestion that would result in a reduction in transportation related pollution and GHG emissions.

Page 4-8, revise the first full paragraph as follows:

4.1.3.12 Objective 12: Provide a Sustainable Form of Transit

The proposed Project and Spring Street Alignment Alternative would meet this objective by providing a sustainable ART system that would provide safe, zero emission, and high-capacity transit connectivity. Both the proposed Project and Spring Street Alignment Alternative would obtain power through renewable electricity, and as such, GHG emissions associated with electricity usage for gondola operations would be zero. The TSM Alternative and No Project Alternative would not meet this objective at this time, as neither alternative would provide a sustainable form of transit by operating the ART system with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality. With respect to the TSM Alternative, while Metro has made significant progress in transitioning to a zero-emission bus service, an April 20, 2023 Metro report extended the deadline for transitioning the Metro bus fleet to zero-emission buses from 2030 to 2035, indicating that Metro would not be able to operate the TSM Alternative with zero-emission buses by the proposed Project's projected opening year. Further, unlike the proposed Project, which has committed to purchase

the power required for operations from the LADWP Green Power Program pursuant to GHG-PDF-A, Metro has not proposed obtaining the electricity for its electric buses from green sources.

Page 4-18, add the following new Section 4.2.1.2:

Pedestrian Enhancement Alternative

Under the Pedestrian Enhancement Alternative, the proposed Project would not be constructed, and instead an enhanced pedestrian walkway and vertical circulation elements would be constructed to improve the safety, comfort and accessibility of walking between the Metro L Line (Gold) Station and Dodger Stadium. This alternative would use the existing pedestrian path between the Metro L Line (Gold) Station and Dodger Stadium along College Street to Yale Street and over the existing pedestrian bridge across State Route 110 (SR-110) to Stadium Way. It would then travel along Stadium Way and the Dodger Stadium driveway to the Downtown Gate E, before crossing the Dodger Stadium parking areas to reach the Stadium. Along the Dodger Stadium driveway to Downtown Gate E, the existing pedestrian pathway is located in a striped shoulder, and no raised sidewalks are provided.

The walking distance between the Metro L Line (Gold) Station and where riders would exit the Dodger Stadium Station is approximately one mile. The Metro L Line (Gold) Station was selected for this analysis because it is the closest rail station to Dodger Stadium with an estimated walk time of 25 minutes, based on the typical 3.5 feet per second walk time that is used in the California Manual of Uniform Traffic Control Devices (CA MUTCD) for estimating crossing distances. The walk time would likely exceed a 25 minute walk time because it does not take into account pedestrian delay at intersections, crowded walking conditions, slower walk times due to the elevation change, or the walk time up and down the helix ramp to enter and exit the existing pedestrian bridge over the SR-110.

The elevation change of the existing pedestrian path from the Metro L Line (Gold) Station to Dodger Stadium is approximately 215 feet (300 foot elevation above sea level at the Metro L Line (Gold) Station entrance and 515 foot elevation at Dodger Stadium Station).¹⁴ The steepest portion of the existing pedestrian path runs from approximately the intersection of Lookout Drive and Stadium Way (approximately 400 foot elevation) to the location of the Dodger Stadium Station, an elevation change of approximately 115 feet over an approximately 2,200 foot walking distance, or an average of a five percent slope. This slope, on average, is at the upper end of the acceptable slope to comply with Americans with Disabilities Act (“ADA”) Accessibility Guidelines, and several sections of the existing pedestrian pathway likely exceed the five percent maximum longitudinal slope requirements under ADA Accessibility Guidelines, which would require the construction of zig zags, and/or the construction of landings, in order to maintain an acceptable slope in compliance with ADA Accessibility Guidelines, which could further increase the walking distance and estimated walk time from the Metro L Line (Gold) Station and Dodger Stadium.

For the portion of the existing pedestrian path between the Metro L Line (Gold) Station and the entrance to Dodger Stadium at the entrance to the Dodger Stadium driveway to Downtown Gate E at Stadium Way, the existing sidewalks on City streets have limited opportunities for widening, as they front existing homes, apartments and businesses. This alternative would include striped

pedestrian crossings with high visibility crosswalks, with MUTCD compliant pedestrian phases, and wayfinding to direct Dodger game and event attendees. Traffic control officers (TCOs) may also be needed to manage pedestrian crossings with large crowds to ensure safety and balance pedestrian and vehicle flow.

Along the Dodger Stadium driveway to Downtown Gate E, this alternative would provide covered vertical circulation/pathways inclusive of sidewalks, and a minimum of three escalators (two to operate in the peak direction) along the Dodger Stadium driveway to Downtown Gate E (approximately 1,600 feet in elevation). As a comparison, this is approximately twice the length of and 30 percent greater elevation gain at the Universal Studios Hollywood Starway, which connects the upper and lower lots of the theme park, over an approximately 170 foot elevation change (600 foot elevation at base of Starway, 770 foot elevation at top of Starway).¹⁵ The Universal Studios Hollywood Starway takes approximately six to seven minutes to traverse the four sets of escalators and landings/walkways in between, so the vertical circulation elements of the Pedestrian Enhancement Alternative could take longer based on it being twice the length of and greater elevation gain than the Starway. Construction of this facility would occur either by removing portions of the embankment along the western edge of the driveway, which would require substantial retaining walls, or removal of vehicle lanes from the Dodger Stadium driveway to Downtown Gate E, which would increase vehicle congestion and queuing.

The Pedestrian Enhancement Alternative was dismissed from further detailed consideration due to the inability to meet most of the proposed Project’s objectives. While this alternative would provide improved pedestrian connections compared with existing conditions, the 25 minute plus travel time from the Metro L Line (Gold) Station to the location of the proposed Dodger Stadium Station under this alternative would be nearly nine times that of the proposed Project travel time of three minutes between these two locations, and would involve substantial physical exertion, even with the proposed vertical circulation enhancements. Given these limitations, this alternative is unlikely to attract substantially more people to walk to Dodger Stadium compared to existing conditions. The typical distance assumed for walking access to a transit station is a half mile, and much beyond this distance fewer people are willing to walk, and the VMT reduction benefit of transit is diminished. The Pedestrian Enhancement Alternative walking distance would be approximately one mile - twice this distance. Thus, this alternative is unlikely to generate anywhere close to the usage expected by the proposed Project which, given the capacity of the proposed Project, could carry approximately 20 percent of Dodgers fans to Metro’s regional transit system.

Due to these limitations, this alternative did not meet the proposed Project’s objectives to expand mobility options for transit riders, attract new riders to the Metro system, enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, including the Los Angeles State Historic Park and Elysian Park, increase connectivity to the region’s public transportation hub at LAUS and the Dodger Stadium property, or to improve the Dodger Stadium visitor experience by providing efficient, high-capacity and faster alternative access to Dodger Stadium, to the same extent as the proposed Project. This alternative would not provide the proposed Project’s pedestrian improvements

between Metro’s L Line (Gold) Station and the entrance to the Los Angeles State Historic Park, which is provided primarily for passengers transferring between the Metro L Line (Gold) and the proposed Project. In comparison, the Chinatown/State Park Station enhances transit access to surrounding communities, including the Los Angeles State Historic Park, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway. Chinatown/State Park Station also provides the community benefit of Park amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms. Additionally, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. Pedestrian access enhancements could include pedestrian improvements between Metro’s L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, including hardscape and landscape improvements, shade structures, and potential seating, as well as support for the future Los Angeles State Historic Park bike and pedestrian bridge. Overall, the community benefits listed above would not be constructed under this Pedestrian Enhancement Alternative.

In addition, because this alternative would not reduce VMT to the same extent as the proposed Project, this alternative would not meet the objective to reduce vehicular congestion in and around Dodger Stadium, and on neighborhood streets, arterial roadways, and freeways during game and special event days to the same extent as the proposed Project. And, if vehicle lanes were removed from the Dodger Stadium driveway to accommodate this alternative, this could increase vehicle congestion and queueing.

Accordingly, this alternative was ultimately dismissed from further analysis in the Final EIR because it would not meet most of the project objectives to the same degree as the proposed Project.

While the Pedestrian Enhancement Alternative has been considered but dismissed from further detailed analysis because it does not meet most of the basic project objectives, the proposed Project includes substantial pedestrian enhancements along the proposed Project alignment. The proposed Alameda Station would provide pedestrian access to the planned LAUS Forecourt and El Pueblo. Vertical circulation elements (i.e., elevators, escalators, stairs) for pedestrian access on the west would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo in an area currently used as a parking and loading area for El Pueblo. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle. Alpine Tower would also include the installation of landscaping and hardscaping near the base of the tower. To facilitate transportation connectivity, the proposed Project would include pedestrian access enhancements including pedestrian improvements between Metro’s L Line (Gold) Station and Chinatown/State Park Station consistent with the Connect US Action Plan, shade structure, and potential seating. Chinatown/State Park Station would also include Park amenities, including approximately 740 square feet of concessions, 770 square feet of restrooms, and a 220 square foot covered breezeway connecting the concessions and restrooms.

Additionally, Chinatown/State Park Station would include a mobility hub where passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program. The proposed Project would also provide support for the future Los Angeles State Historic Park bike and pedestrian bridge. Dodger Stadium Station would include a pedestrian connection to Dodger Stadium, including hardscape and landscape improvements and potential seating. The proposed Project would also provide a mobility hub at Dodger Stadium Station where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.

Footnote 14: Elevations obtained from topographic-map.com. <https://en-gb.topographic-map.com/map-s4hdn/LosAngeles/?center=34.13912%2C-118.35473&zoom=16&popup=34.13943%2C-118.35413>, accessed August 24, 2023.

Footnote 15: *Policy Brief on the Impacts of Transit Access (Distance to Transit) Based on a Review of the Empirical Literature*, Handy & Boarnet, 2013 https://ww2.arb.ca.gov/sites/default/files/2020-06/Impacts_of_Transit_Access_%28Distance_to_Transit%29_Based_on_a_Review_of_the_Empirical_Literature_Policy_Brief.pdf, accessed August 24, 2023.

Page 4-44, revise the last paragraph as follows:

The Spring Street Alignment Alternative would also have similar operational energy demands, renewable power commitments as outlined in GHG-PDF-A, and battery back-up as the proposed Project. In addition, the net reduction in criteria pollutant emissions due to the anticipated decrease in the number of people traveling to Dodger Stadium (and the surrounding area) in passenger vehicles and increase in number of people using public transit would remain the same. As such, the Spring Street Alignment Alternative would not result in an exceedance of the SCAQMD operational maximum daily emissions significance thresholds and would be consistent with the SCAQMD's Air Quality Management Plan. As such, impacts related to air quality under the Spring Street Alignment Alternative would be less than significant. Therefore, impacts related to air quality resources under the Spring Street Alignment Alternative would be similar to the less than significant impacts of the proposed Project.

Page 4-45, revise the second and third paragraphs as follows:

Due to the fully urbanized character of the surrounding area, there are no riparian habitats or wetlands within the BSA or adjacent to the State Historic Park Station. In addition, there are currently no active rare, endangered, or threatened habitats listed by the CDFW or the USFWS, or Habitat Conservation Plans or Natural Community Conservation Plans within the BSA or adjacent to the State Historic Park Station. The removal of certain of the trees for the proposed Project would result in a small reduction of habitat for wildlife species that depend on trees for cover, nesting, roosting, foraging, and other reasons. However, the quality of wildlife habitat provided by the trees proposed for removal is relatively low, given that the trees are primarily non-native tree species. In the short-term, the removal of trees will result in a marginal reduction of suitable tree habitat for nesting birds, roosting bats, and other wildlife in the vicinity of the

proposed Project. Common wildlife species would be expected to utilize adjacent habitats, and substantial population level impacts to common species would not be expected due to the small amount of habitat loss relative to the amount of habitat available in surrounding areas. In the long-term, tree replacement of those removed would more than offset any realized impacts associated with the Project.

Page 4-46, revise the first paragraph as follows:

... biological resources under the Spring Street Alignment Alternative would be similar to the less than significant impacts of the proposed Project with mitigation. In addition, the Spring Street Alignment Alternative would also implement BIO-PDF-A through BIO-PDF-F in order to provide additional environmental benefits related to biological resources.

Page 4-47, revise the second full paragraph as follows:

The operational energy usage of the Spring Street Alignment Alternative would also have similar operational energy demands, renewable power commitments (as outlined in GHG-PDF-A), and battery back-up as the proposed Project. In addition, the net reduction in fuel use due to the anticipated decrease in the number of people traveling to Dodger Stadium (and the surrounding area) in passenger vehicles and increase in number of people using public transit would remain the same. As with the proposed Project, the Spring Street Alignment Alternative’s operational energy usage would represent a very small demand on regional energy supplies and would not require the development of additional energy capacity.

Page 4-49, revise the first paragraph as follows:

Similar to the proposed Project, the Spring Street Alignment Alternative would result in a net decrease in GHG emissions compared to existing conditions, albeit a slightly smaller net reduction than the proposed Project. The Spring Street Alignment Alternative would have similar operational energy demands, green power commitments (as outlined in GHG-PDF-A), and battery back-up as the proposed Project. In addition, the net reduction in greenhouse gas emissions due to the anticipated decrease in the number of people traveling to Dodger Stadium (and the surrounding area) in passenger vehicles and increase in number of people using public transit would remain the same.

Page 4-49, revise the third paragraph as follows:

Hazards and Hazardous Materials

The Spring Street Alignment Alternative would result in development of an ART system; therefore, the Spring Street Alignment Alternative has the potential to increase or change exposure to hazards and hazardous materials. Similar to the proposed Project, during construction activities for the stations, junction, and towers, it is anticipated that limited amounts of hazardous substances, such as solvents, paints, oils, hydraulic fluids, gasoline, diesel fuel, etc. would be transported to and used at the component sites throughout the duration of construction. In order to obtain permits required to commence construction, the Spring Street Alignment Alternative would comply with all applicable local, state and federal regulations. These regulations identify

safety standards and procedures related to the removal, handling, storage, transport, use, and disposal of hazardous materials and require testing, abatement, and remediation when deemed necessary. The Spring Street Alignment Alternative would also implement Mitigation Measure HAZ-A, which requires preparation and submittal to the Los Angeles Department of Building and Safety (LADBS) of a Soil and Groundwater Management Plan. Thus, compliance with all applicable regulations and implementation of Mitigation Measure HAZ-A would ensure that future development would not create a significant hazard to the public, schools, or the environment through the transport, use, disposal, or release of hazardous materials. However, unlike the proposed Project, the Spring Street Alignment Alternative would not require demolition of the existing building at 1201 North Broadway and no mitigation would be required to reduce impacts from hazards or hazardous materials within the 1201 North Broadway building.

Page 4-52, revise the last paragraph as follows:

Implementation of Mitigation Measure TRA-B, WFR-PDF-A, and compliance with applicable State and local regulations, including coordination with LAFD, LAPD, and State Parks prior to construction, would ensure that the Spring Street Alignment Alternative would not create additional demand for LAFD, LAPD, or State Parks services during construction. In addition, with adherence to the applicable regulations, coordination with LAFD, LAPD, and State Parks, and implementation of an Emergency Operations Plan, which would be reviewed prior to the issuance of a building permit, operation of the proposed Project would not create additional demand for LAFD or LAPD services that would result in the need to add new, or physically alter existing fire or police protection facilities.

Page 4-55, revise the second to last paragraph as follows:

Spring Street Junction

Spring Street Junction under the Spring Street Alignment Alternative would be placed in a similar location to Chinatown/State Park Station under the proposed Project. Because the evaluation of the potential to increase geometric hazards is primarily focused on sight visibility for pedestrians and motorists related to the columns, the conclusions for Spring Street Junction under the Alternative are consistent with the conclusions for Chinatown/State Park Station under the proposed Project. This includes the implementation of the visibility enhancements described under Mitigation Measure TRA-A for the Chinatown/State Park Station, including the implementation of an operational strategy in coordination with State Parks to prevent pedestrians from crossing the driveway west of the columns and channelization of pedestrians to the crosswalk, which would alleviate potential visibility issues associated with operation of the Spring Street Junction. With implementation of Mitigation Measure TRA-A, impacts would be less than significant. Nevertheless, to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the Alternative would also incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 4-56, revise the first paragraph as follows:

...crossing for pedestrians. Traffic signals are located well beyond the 250 feet required for vertical sight distance, so there is no anticipated vertical sight distance issue related to traffic signals. Vehicles traveling northbound would have a clear line of sight for pedestrians crossing at this intersection, and therefore no sight distance issues are expected. The intersections of Spring Street at Sotello Street and Spring Street at Mesnagers Street are also beyond 250 feet from the columns for both northbound and southbound vehicles, and so there would be a clear line of sight at these intersections and no sight distance issues are expected. To mitigate the potential for significant visibility impacts associated with pedestrians crossing Spring Street at Ann Street, mitigation would be implemented, including the provision of marked crosswalks at the intersection of Spring Street and Ann Street and the signalization of the intersection of Spring Street and Ann Street in order to mitigate the potential visibility impact associated with pedestrians crossing at this intersection. Mitigation Measure TRA-A would therefore be implemented to alleviate potential visibility issues associated with the operation of State Historic Park Station. With implementation of this Mmitigation-Measure TRA-A, impacts would be less than significant.

Page 4-56, revise the second full paragraph as follows:

Accordingly, mitigation is required to ~~Implementation of the visibility enhancements described under Mitigation Measure TRA-A would~~ alleviate visibility issues associated with operation of Bishops Tower under the Spring Street Alignment Alternative. As mitigation, the Spring Street Alignment Alternative would implement a three-way stop sign at the intersection of Bishops Road and Savoy Street. With implementation of this mmitigation-Measure TRA-A, impacts would be less than significant.

Page 4-63, add the following after the third paragraph:

The Metro Board received and filed a board report on April 20, 2023, regarding a staff recommendation to extend the deadline for transitioning the entire bus fleet to zero-emission buses from 2030 to 2035.¹⁶ While Metro has made significant progress in transitioning to a zero-emission bus service, the report recognizes that “the ZEB industry is still evolving and not sufficiently mature to allow for full implementation by 2030 without risk to service. Key issues include cost, grid capacity, performance (reliability, maintainability, and operability), early obsolescence, utility lead times, and supply chain issues.” Further, unlike the proposed Project, which pursuant to GHG-PDF-A, has pledged to purchase power required for operations from the LADWP Green Power Program, Metro has not proposed obtaining the electricity for its electric buses from green sources. The Metro report discusses the potential issues with the electrical grid’s ability to provide the electricity that Metro would require for a full zero-emission bus fleet. Regardless of whether the shuttle buses would be electrified, the operational issues associated with substantially expanding the Dodger Stadium Express discussed above remain. Given that the Metro fleet would not be electrified until well after the proposed Project’s projected opening year, the analysis of the TSM Alternative presumes that the TSM Alternative shuttle buses would not be electric, and would instead operate using natural gas as Metro’s buses currently use.

Footnote 16: <https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf>.

Page 4-65, revise the first and second paragraphs as follows:

However, the increase in emissions under the TSM Alternative would be partially offset by the reduction in VMT due to an increased number of people using public transit to travel to Dodger Stadium instead of private vehicles. Emissions could be further reduced through the use of electric buses for the TSM Alternative. However, the Metro Board received and filed a board report on April 20, 2023, regarding a staff recommendation to extend the deadline for transitioning the entire bus fleet to zero-emission buses from 2030 to 2035.¹⁷ While Metro has made significant progress in transitioning to a zero-emission bus service, the report recognizes that “the ZEB industry is still evolving and not sufficiently mature to allow for full implementation by 2030 without risk to service. Key issues include cost, grid capacity, performance (reliability, maintainability, and operability), early obsolescence, utility lead times, and supply chain issues.” Further, unlike the proposed Project, which has pledged to purchase power required for operations from the LADWP Green Power Program pursuant to GHG-PDF-A, Metro has not proposed obtaining the electricity for its electric buses from green sources. The Metro report discusses the potential issues with the electrical grid’s ability to provide the electricity that Metro would require for a full zero-emission bus fleet.

The proposed Project would also result in a net reduction in criteria pollutant emissions by reducing VMT compared to existing conditions. The TSM Alternative would have higher VMT than the proposed Project, resulting in higher emissions than the proposed Project, even if buses were fully zero-emission, as the TSM Alternative would still result in an increase in bus VMT, with additional buses creating an increase of activity. Because the TSM Alternative involves an increase in emission producing activity over the proposed Project, it would result in increased air quality impacts compared to the proposed Project. The estimated maximum mass daily emissions for the TSM Alternative operations are less than the SCAQMD mass daily significance thresholds for all criteria pollutants. Therefore, impacts related to air quality under the TSM Alternative would be similar to the less than significant impacts of the proposed Project.

Footnote 17: <https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf>.

Page 4-66, revise the first paragraph as follows:

Energy

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would involve relocating operations from the Union Station/Metro Gateway property to Division 13, longer loading zones at Dodger Stadium, and dedicated routes into and around the Dodger Stadium, which may require substantive modification to the parking lots. As such, the TSM Alternative would result in a change to current activities on the proposed Project site. In order to accommodate service frequencies of 47 seconds, a minimum of 6 buses loading simultaneously would be required. Because the TSM Alternative would allow for an increased number of people using public transit, associated emissions and fuel use would increase compared to the existing DSE service. However, consumption of energy resources would not be wasteful or inefficient, nor

would the TSM Alternative conflict with energy efficiency plans as the buses used to operate the TSM Alternative would use compressed natural gas. Further, the TSM Alternative buses could be transitioned to electric buses in the future, as Metro considers electrification of its bus fleet by 2035.¹⁸ In addition, compared to the proposed Project, the TSM Alternative’s construction phase would be significantly reduced, thus resulting in fewer impacts. Therefore, impacts related to energy under the TSM Alternative would be similar to the less than significant impacts of the proposed Project with mitigation.

However, while operation of the TSM Alternative may result in an increased number of people traveling to Dodger Stadium by public transit, VMT would be higher compared to the proposed Project and associated emissions and fuel use of the additional buses would also result in an increase of energy consumption compared to the proposed Project. Further, even if Metro transitions its bus fleet to electric buses by 2035, after the projected opening year for the proposed Project, the TSM Alternative is unlikely to achieve the same level of ridership as the proposed Project, and therefore would not achieve the same level of emissions and fuel use reductions as the proposed Project. In addition, the TSM Alternative would not benefit from the proposed Project’s green power commitments, as even if Metro transitions to electric buses, Metro has not proposed obtaining electricity from electric buses from green sources, and battery back-up system. As such, while the TSM Alternative could result in reduced VMT compared to existing conditions, the VMT reduction would be less than the proposed Project. Therefore, the beneficial improvements associated with the proposed Project would not occur.

Footnote 18: <https://datamade-metro-pdf-merger.s3.amazonaws.com/2023-0207.pdf>.

Page 4-66, revise the last three paragraphs as follows:

Geology and Soils

~~The TSM Alternative would not result in development of an ART system and would involve relocating operations from the Union Station/Metro Gateway property to Division 13, longer loading zones at Dodger Stadium, and dedicated routes into and around the Dodger Stadium, which may require substantive modification to the parking lots. In addition, the TSM Alternative would include additional DSE service trips, which would generate new GHG emissions.~~

~~Because the TSM Alternative involves an increase in a GHG emission producing activity over existing conditions, it could result in GHG emission impacts, and potential impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. However, this would be partially offset by the increased number of people using public transit to travel to Dodger Stadium instead of private vehicles, and impacts to GHG emissions would be less than significant. Therefore, impacts related to GHG emissions under the TSM Alternative would be higher than but similar to the less than significant impacts of the proposed Project.~~

~~However, compared to the proposed Project, the number of people traveling to Dodger Stadium and using public transit would be similar, but they would be traveling on DSE bus routes as opposed to the aerial tramway, and would not reduce associated GHG emissions and fuel use to~~

~~the same extent as the proposed Project. Therefore, not all of the beneficial GHG reductions associated with the proposed Project would occur.~~

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would involve relocating operations from the Union Station/Metro Gateway property to Division 13, longer loading zones at Dodger Stadium, and dedicated routes into and around the Dodger Stadium, which may require modification to the parking lots. Overall, the TSM Alternative would not increase or change exposure to existing environmental conditions, such as fault rupture, seismic shaking, liquefaction, or other geologic hazards. Because the TSM Alternative would not require any new development, excavation activity, or exposure of soils, it would not change the existing exposure to geologic conditions or have an impact on paleontological resources. In addition, the TSM Alternative would not include any new development that would expose more people or structures to geologic hazards, such as expansive soils. As such, although the proposed Project impacts would be less than significant with mitigation, the TSM Alternative would result in less than significant impacts related to geology and soils. Therefore, impacts related to geology and soils under the TSM Alternative would be less than the less than significant impacts of the proposed Project with mitigation.

Page 4-67, revise the first three paragraphs as follows:

Greenhouse Gas Emissions

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would result in new development that would require relocating from the LAUS to Metro Division 13, larger loading zones at Dodger Stadium, and dedicated routes between LAUS and into and around the Dodger Stadium, which may require modification to the Dodger Stadium parking lots, to increase the capacity of the Union Station DSE. In addition, the TSM Alternative would include additional DSE service trips, which would generate new GHG emissions.

Because the TSM Alternative involves an increase in a GHG emission producing activity over existing conditions, it could result in GHG emission impacts, and potential impacts regarding conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing GHGs. However, this would be partially offset by the increased number of people using public transit to travel to Dodger Stadium instead of private vehicles, and impacts to GHG emissions would be less than significant. Therefore, impacts related to GHG emissions under the TSM Alternative would be similar to the less than significant impacts of the proposed Project.

However, compared the proposed Project, the number of people traveling to Dodger Stadium and using public transit would be similar, but they would be traveling on DSE bus routes as opposed to the ~~aerial tramway~~ART system, and would not reduce associated GHG emissions and fuel use to the extent of the proposed Project, although fuel use may be reduced in the future as Metro electrifies its bus fleet by 2035. As such, GHG emissions and fuel use would not be reduced, and fuel use would not be reduced upon initial operations, and could only be reduced in the future if Metro electrifies its bus fleet. Therefore, the beneficial improvements associated with the proposed Project would not occur.

Page 4-73, revise the fourth paragraph as follows:

Utilities and Service Systems

The TSM Alternative would not result in development of an ART system; however, the TSM Alternative would result in new development that would require relocating from the LAUS to Metro Division 13, larger loading zones at Dodger Stadium, and dedicated routes between LAUS and into and around the Dodger Stadium, which may require modification to the Dodger Stadium parking lots, to increase the capacity of the Union Station DSE. Overall, under the TSM Alternative, the existing onsite water and sewer systems would continue to be used, and no new connections to existing utilities systems would be required. No additional demand for regional water supplies would occur, and no additional wastewater would be conveyed to the wastewater treatment facility. In addition, no additional drainage infrastructure would be developed by the TSM Alternative, and runoff in the proposed Project area would remain in its current condition and no storm water system improvements would be required. Further, solid waste generation would remain the same as the existing condition and increases in needs for landfill capacity would not occur with the TSM Alternative. As such, although the proposed Project impacts would be less than significant with mitigation, the TSM Alternative would result in no impact to utilities and service systems. Therefore, impacts to utilities and service systems under the TSM Alternative would be reduced compared to the less than significant impacts of the proposed Project.

To the extent that the TSM Alternative transitions to electric buses along with Metro’s bus fleet, the April 20, 2023 Metro Board report recognized that there may be potential issues with the electrical grid’s ability to provide the electricity that Metro would require for a full zero-emission bus fleet. Accordingly, should the TSM Alternative use electric buses, there may be additional utility impacts associated with the transition. Metro’s projected timeline for electrification of the bus fleet would occur after the proposed Project’s potential opening year, and therefore this analysis assumes the initial operational conditions.

SECTION 5.0 OTHER CEQA CONSIDERATIONS

In addition to the general additions and corrections provided above, revise Section 5.0, Other CEQA Considerations, as follows:

Page 5-14, revise the first paragraph as follows:

Due to its urbanized and developed nature, the Biological Survey Area (BSA) provides little opportunity for wildlife species or other biological resources to exist. No native plant communities occur within or adjacent to the BSA. There are no wildlife corridors within the BSA to support movement of wildlife species. There are no sensitive natural communities such as wetlands, oak woodlands, or coastal sage scrub habitat within the BSA. There are no Habitat Conservation Plans that overlap with the BSA, and the nearest Significant Ecological Area is located approximately five miles north-northwest of Dodger Stadium at Griffith Park. While construction of the proposed Project would result in the removal of trees, as detailed in Table 3.4 1, their removal and replacement would be subject to the City’s Native Tree Protection Ordinance, the City of Los Angeles Urban Forestry Division, and a special permit from the California Department of Parks

and Recreation. Additionally, the proposed Project would implement standard best management practices and mitigation measures related to the control of fugitive dust, noise, and vibration, including compliance with SCAQMD Rule 403, Mitigation Measures NOI-A and NOI-B, and compliance with the Migratory Bird Treaty Act to minimize impacts to roosting bats and nesting birds. Therefore, the proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and impacts would be less than significant. In addition, the proposed Project would implement BIO-PDF-A to provide additional environmental benefits regarding biological resources, and following consultation with CDFW, additional Project Design Features were incorporated to provide additional environmental benefits regarding biological resources, BIO-PDF-B, BIO-PDF-C, BIO-PDF-D, BIO-PDF-E, BIO-PDF-F, BIO-PDF-G, and BIO PDF-H.

Page 5-26, revise the second full paragraph as follows:

5.2.8 Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions are regionally cumulative in nature. The analysis of GHG emission impacts under CEQA contained in this Draft EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. As discussed in Section 3.7, Greenhouse Gas Emissions, current vehicular emissions are associated with games and events at Dodger Stadium as a result of passengers in vehicles traveling to the Stadium, along with employees (i.e., total VMT). By transitioning a portion of the passengers of these vehicles to the proposed Project, total VMT would be reduced along with corresponding reductions in emissions. During operation, the proposed Project would obtain power through renewable electricity pursuant to GHG-PDF-A, and as such, GHG emissions associated with electricity usage for gondola operations would be zero. Additionally, the proposed Project would feature battery storage in lieu of diesel generators as a backup power supply to allow for unloading of the aerial gondola system in the event of a temporary power grid failure. Ultimately, the proposed Project would reduce GHG emissions compared to the baseline conditions. In addition, the proposed Project would be consistent with applicable plans for the reduction of GHG emissions. Therefore, cumulative impacts with respect to GHG emissions would be less than significant.

Page 5-26, revise the last paragraph as follows:

5.2.9 Hazards and Hazardous Materials

Cumulative hazardous materials effects could occur if the related projects within the City of Los Angeles, when combined with the proposed Project, would have the potential to expose future area residents, employees, and visitors to chemical hazards through redevelopment of sites and structures that may be contaminated from either historic or ongoing uses. The proposed Project and related projects would be required to comply with applicable federal, State, and local regulations that govern hazardous materials during construction. The proposed Project would have the potential to encounter contaminated soils or groundwater during construction. The proposed Project is also located on a site included on a list included on a list of hazardous materials sites. However, Mitigation Measures HAZ-A and HAZ-B described further in Section 3.9, Hazards and Hazardous Materials, include the preparation and submittal to the Los Angeles Department

of Building and Safety (LADBS) of a Soil and Groundwater Management Plan and hazardous materials abatement measures to minimize impacts related to hazards and hazardous materials.

Page 5-28, revise the second paragraph as follows:

The area considered for water quality impacts is the LARWQCB's jurisdiction. The proposed Project and related projects have the potential to generate pollutants during project construction and operation. All construction projects that disturb one acre or more of land would be required to prepare and implement SWPPPs in order to obtain coverage under the Statewide CGP. All projects within the watershed would also be required to prepare and implement LID reports specifying BMPs, that would be applied during project design and project operation to minimize water pollution from project operation. Additionally, as stated in Section 3.9, Hazards and Hazardous Materials, a Soil and Groundwater Management Plan would be prepared, submitted to LADBS, and implemented to specify methods for handling and disposal in the event contaminated groundwater is encountered during construction. The Project Sponsor would prepare and submit an IGP SWPPP, which must be submitted to the SWRCB prior to and adhered to during operations. The IGP SWPPP, which would apply to portions of the proposed Project that include defined industrial activities, such as maintenance and equipment cleaning areas, and the LID Plan would identify the BMPs for Project operations. Therefore, cumulative impacts with respect to water quality would be less than significant.

Page 5-36, revise the first full paragraph as follows:

In the event that proposed Project construction occurs concurrently with related projects in proximity to the Project site, specific coordination among these multiple construction sites would be required and implemented through the proposed Project's Construction Traffic Management Plan, as outlined in Mitigation Measure TRA-B in Section 3.17, Transportation, which would be required to ensure adequate emergency access is maintained on adjacent ROWS_s throughout all construction activities.

Page 5-37, revise the fourth full paragraph as follows:

Construction activities associated with the proposed Project would be short term and would take precautions to minimize security incidents that could result in demand for police protection through fencing and other security barriers. Once operational, the proposed Project would include security features, including lighting, staffing, cameras, and access closures at night; cabins with surveillance, secured windows, and two-way communication to system control rooms; and preparation of an Emergency Operations Plan, which would include emergency response protocols and safety procedures developed in conjunction with the operator, system provider, and local and state authorities (e.g., LAFD, LAPD, and State Parks as applicable). The plan would address operational changes and communications protocols required in response to a range of potential emergencies, such as a medical emergency in a cabin or in a station, or a fire near the alignment. The plan would consider a wide range of scenarios for which default operational responses would be determined. In addition, the plan would include communication protocols with local and state authorities for further instruction and coordination.

Page 5-42, revise the first paragraph as follows:

projects in the vicinity would also be required to analyze and mitigate for transportation-related construction impacts. In addition, in order to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the proposed Project would incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park.

Page 5-49, revise the last paragraph as follows:

Utilities

The geographic area considered for the analysis of cumulative impacts pertaining to public services is the urbanized and developed City of Los Angeles. Implementation of the proposed Project in conjunction with the related projects would increase the demand for electricity. For the City of Los Angeles, LADWP is the sole supplier of electricity to businesses and residents of the area. It is estimated that the ART system would require a total estimated power requirement of approximately 2.5 megawatts to operate the entire gondola system and other station functions such as elevators, escalators, and heating, ventilation, and air conditioning system. The electrical power for the operation of the proposed Project would be supplied by LADWP through the utility's Green Power Program, pursuant to GHG-PDF-A. Accordingly, the primary electricity usage associated with the proposed Project would come from renewable resources, and it is anticipated that the existing power supply provided for the proposed Project would be sufficient for Project operation. It was determined in Section 3.6, Energy, and Section 3.19, Utilities and Service Systems, that implementation of the proposed Project would ~~would~~ not have a substantial effect on State-wide or regional energy resources.

Page 5-53, revise the last paragraph as follows:

The electrical power for Project operations of the aerial gondola system and associated stations, junction, and towers would be supplied by LADWP through the utility's Green Power Program, pursuant to GHG-PDF-A. Accordingly, the primary electricity usage associated with the proposed Project would come from renewable resources.

Page 5-55, revise the first paragraph as follows:

The proposed Project would implement Mitigation Measure HAZ-A to prepare and submit to LADBS a sSoil and gGroundwater mManagement pPlan, which shall include sampling and analyzing soils/groundwater and required methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal, to reduce impacts related to construction to less than significant.

Page 5-55, revise the fourth paragraph as follows:

Implementation of the proposed Project would commit land designated as public ROW, commercial, residential, and open space uses at the stations, junction, and towers to transit uses. The majority of the Project alignment and components would be constructed within or above the public ROW and/or publicly owned property. However, no housing or businesses would be

displaced. As discussed in Chapter 2, Project Description, Subsection 2.11, Required Permits and Approvals, the Project Sponsor is seeking to amend LAMC Sections 12.32 and 11.5.7 to create an ~~Overlay District or Specific Plan~~ pursuant to LAMC section 11.5.7 to provide for consistent application of Project design standards, limitations, and operational measures. With approval of the permits and approvals listed in Subsection 2.11, ~~the amendments to the zoning code to allow the proposed Project uses~~, development of these Project components would not conflict with the applicable LAMC requirements at the time of Project implementation, and the impact would be less than significant.

Page 5-62, revise the second paragraph as follows:

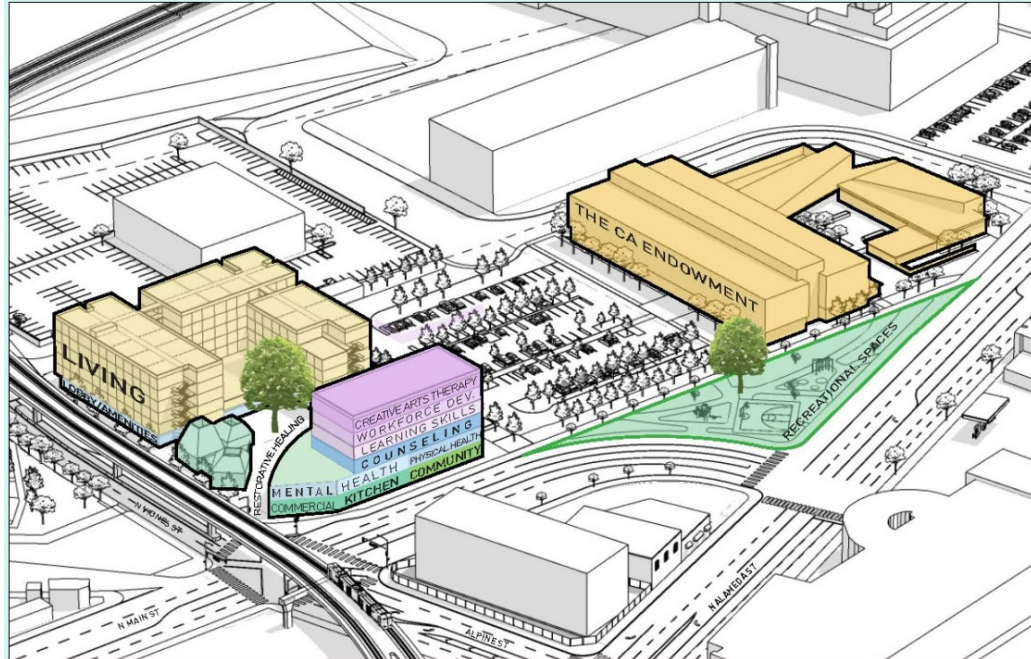
ANSI B77.1 requires the following vertical clearances: vehicles – five feet; vegetation or terrain – five feet; at-grade where pedestrians are present – eight feet; buildings – five feet; and roadways or railways – to be determined with the authority having jurisdiction. The proposed Project’s vertical clearance to the bottom of the cabins would range from 26 to 53 feet with an average of approximately 40 feet from ground level over the park. Given these required clearances and the height at which the cabins would travel over the Los Angeles State Historic Park, it will continue to be possible for most events to take place both under the majority of the alignment within the park and adjacent to the alignment. Aside from the tallest types of event uses (e.g., stages with tall screens), which could be sited directly adjacent to the alignment, all other event uses, such as food trucks, production areas, and seating areas, can occur directly beneath the alignment. In addition, ~~as~~ as depicted on Figure 5-3, according to the Los Angeles State Historic Park Bike and Pedestrian Bridge Feasibility Study, the Project alignment is located outside of typical locations for event stages. Moreover, Figure 5-4 depicts potential temporary special event stage, structures, and use locations that the Los Angeles State Historic Park has made available for special events within the park. However, the proposed Project could affect the ability to use those areas for specific special event structures. Coordination as to operation of special events at the Los Angeles State Historic Park and the proposed Project are anticipated to ~~be~~ be addressed in operational agreements related to the park.

Page 5-68, add a new Section 5.5.6:

Hope Village

The California Endowment published its Annual Report 2023³⁸ with additional information regarding the Hope Village, which anticipates offering housing, community, and health services to formerly incarcerated, unhoused, and economically disadvantaged residents. A graphic in the Annual Report 2023 depicts the Alameda Triangle, a City ROW between Alameda Street, North Main Street, and Alhambra Avenue, as “RECREATIONAL SPACES.”

The following graphic from the Annual Report 2023 depicts the recreational spaces.



As detailed in Section 2.0, Project Description, the proposed Project proposes to locate the Alameda Tower in the northwest corner of the Alameda Triangle. The Alameda Tower base would be 900 square feet, as depicted in Figure 2-12: Proposed Alameda Tower Location. Implementation of Alameda Tower would include reuse and integration of the existing pavers located at the Alameda Triangle, as well as landscape and hardscape updates to the Alameda Triangle.

The proposed Project would not impair or impact The California Endowment’s potential use of the Alameda Triangle for recreational spaces. As noted, the Tower base would be located in 900 square feet of the approximately 22,000 square foot Alameda Triangle. The following graphic depicts the Alameda Triangle, including space for both the Alameda Tower and potential recreational spaces based on the graphic in the Annual Report 2023.



The proposed Project's Alameda Tower would not impede The California Endowment's potential use of the Alameda Triangle for recreational spaces.

Footnote 38: The California Endowment, Annual Report 2023, available at <https://www.calendow.org/annual-report> (accessed August 25, 2023).

SECTION 6.0 DESIGN AND USE OPTIONS

In addition to the general additions and corrections provided above, revise Section 6.0, Design and Use Options, as follows:

Page 6-1, revise the fourth paragraph as follows:

The five design and use options are described below, along with an analysis of their potential environmental impacts. The impact analysis is performed relative to the respective Project component of the proposed Project. For reference, the proposed Project is described in detail in Section 2.5 of the Project Description. Specifically, stations and junctions are described in Section 2.5.3, while towers are described in Section 2.5.4. All design and use options could be implemented individually, together, or in any combination without changing the significance conclusions reached in the EIR for the proposed Project.

Page 6-1, revise the fifth paragraph as follows:

6.2 Design Option A

6.2.1 Description

Design Option A includes a shift in the overall Project alignment between the Broadway Junction and Dodger Stadium Station to avoid aerial rights requirements over 451 E. Savoy Street. Figure 6-1 shows the proposed Project alignment, with additional detail as to the public ROW, publicly owned property, and private properties in Appendix P, Design Option A Plan and Profile. As shown in Figure 6-2 below, under Design Option A, while headed north from the Broadway Junction, the alignment would shift to be further west from 451 E. Savoy Street. This shift would result in the alignment crossing over a small portion of Cathedral High School. This Design Option includes changes to the Project components of Broadway Junction, Stadium Tower, and Dodger Stadium Station. These changes are described below.

Page 6-2, revise the first paragraph as follows:

In addition, the shift at Stadium Tower would result in utility relocations, including the relocation of a water valve and encroachment into the City's water easement in this location, as well as the potential addition of a retaining wall on the upslope. The shift at Dodger Stadium Station would also result in, the realignment of the Dodger Stadium perimeter roadway. In addition, construction of the Dodger Stadium Station at this location would require utility relocations, including relocation of a 36-inch storm drain and telecom line and encroachment into the City's water easement at this location. Moreover, construction of the Dodger Stadium Station at this location requires construction on steeper slopes and the potential addition of a retaining wall to accommodate the steeper approach to the station. The Dodger Stadium Station at this location would also require removal of ~~additional~~ 337 parking spaces at the Dodger Stadium property (compared to 194 for the proposed Project) and requires a longer walk for proposed Project passengers to travel between the Dodger Stadium Station and Dodger Stadium.

Page 6-8, revise the first full paragraph as follows:

Design Option A does not materially differ in overall dimension, location, building material, or construction technique as compared to the proposed Project. Design Option A would have similar impacts to the proposed Project in the following CEQA impact areas: Agriculture and Forestry Resources; Hazards and Hazardous Materials; Hydrology and Water Quality; ~~Land Use and Planning~~; Mineral Resources; Noise; Population and Housing; Public Services; Recreation; Transportation; Tribal Cultural Resources; and Wildfire. Any mitigation measures required for the respective proposed Project components would also be required for those of Design Option A.

Page 6-11, revise the last full paragraph as follows:

Air Quality

Under Design Option A, the Broadway Junction would result in similar impacts related to air quality as the proposed Project. Therefore, no additional analysis is required for this Project component. Stadium Tower and Dodger Stadium Station are the only components of Design

Option A that would result in impacts that differ from the proposed Project. Therefore, an additional analysis of air quality impacts from Stadium Tower and Dodger Stadium Station is provided below. In addition, under Design Option A, all operational impacts would be less than significant and similar to the proposed Project. As such, additional analysis of operational impacts is not required.

Page 6-13, revise the first paragraph as follows:

Biological Resources

Under Design Option A, the Broadway Junction and Dodger Stadium Station would result in similar impacts related to biological resources as the proposed Project, and would similarly implement the project design features BIO-PDF-A through BIO-PDF-H in order to provide additional environmental benefits related to biological resources. Therefore, no additional analysis is required for these Project components. Stadium Tower is the only component of Design Option A that would result in impacts that differ from the proposed Project. Therefore, an additional analysis of biological resources impacts from Stadium Tower is provided below. In addition, under Design Option A, all operational impacts would be less than significant and similar to the proposed Project. As such, additional analysis of operational impacts is not required.

Page 6-13, revise the second paragraph as follows:

A tree inventory report was prepared (attached to Appendix C of this Draft EIR), and trees occurring along the Project alignment were inventoried for species, size, and location. The City of Los Angeles Planning Department considers all trees with trunk diameters of eight inches or greater as ‘significant.’ Based upon the tree inventory report, ~~3155~~ significant trees at the Stadium Tower location, including the fire buffer zone (as described in Section 3.20, Wildfire), for construction would be removed under the proposed Project. Using this same tree inventory report, up to approximately 85 significant trees would be removed at a similar number of significant trees would be removed at Stadium Tower location under Design Option A, including the fire buffer zone. ~~This would result in up to 54 additional significant trees being removed for construction and operation of the Stadium Tower under Design Option A.~~ None of these inventoried trees were identified as City-ordinance protected trees.

Page 6-17, add in the following paragraph before the “Utilities and Service Systems” heading as follows:

Land Use and Planning

Under Design Option A, the Broadway Junction and Stadium Tower would result in similar impacts related to land use as the proposed Project. Therefore, no additional analysis is required for these Project components. An additional analysis of land use impacts from Dodger Stadium Station is provided below.

Dodger Stadium Station

Dodger Stadium Station under Design Option A would result in the removal of additional parking spaces as compared to the proposed Project. As discussed in Section 3.11, Land Use and Planning, the Dodger Stadium CUP requires “[t]hat automobile parking facilities for a minimum of one (1)

automobile for each 3.6 seats provided in the Stadium shall be provided and maintained on the site generally . . .”. Condition no. 1 of the Dodger Stadium CUP states that Dodger Stadium “shall have a maximum seating capacity of 56,000 persons.” Condition no. 3 of the Dodger Stadium CUP requires “[t]hat automobile parking facilities for a minimum of one (1) automobile for each 3.6 seats provided in the Stadium shall be provided and maintained on site”, so a total of 15,556 parking spaces must be provided and maintained on site. There are currently a total of 18,889 parking spaces provided and maintained on site. Design Option A would permanently remove 337 parking spaces for the Dodger Stadium Station, due to the increased distance to Dodger Stadium requiring additional area for the proposed pedestrian connection to Dodger Stadium, as well as the retaining wall. Similar to the proposed Project, however, and consistent with the Dodger Stadium CUP, a total of 18,552 parking spaces would remain on site, exceeding the required parking spaces under the CUP. While additional parking spaces would be temporarily utilized at Dodger Stadium for Project construction, the number of parking spaces would at all times exceed the 15,556 total parking spaces that must be provided and maintained on site pursuant to the CUP. Accordingly, Design Option A is consistent with the requirements of the Dodger Stadium CUP and similar to the proposed Project and with the implementation of Mitigation Measure LUP-A, impacts with respect to land use would be less than significant with mitigation.

Page 6-18, revise the second to last paragraph as follows:

In the process of selecting tower locations, the proposed Project prioritizes the use of public property and minimizes private land acquisition, and also considers the proposed Project’s relationship to existing adjacent and potential future land uses. Technical considerations of tower locations also include optimizing the height of the towers and minimizing the number of towers. Additionally, the proposed Project limits the bend on the towers to less than 1.5 2 degrees.

Page 6-20, revise the second and third paragraphs as follows:

Compared to the proposed Project, Design Option B would potentially result in ~~potential additional technical considerations constraints due to the taller because the tower that approaches the limits of technical feasibility~~ due to the increased angle of bend at the Alameda Tower compared to the proposed Project.

Additionally, Design Option B results in the need for additional private aerial rights requirements. Design Option B includes an increased bend on the Alameda Tower resulting in cables and gondola cabins in closer proximity to private property between Alameda Station to the Chinatown/State Park Station. The proposed Project aerial rights requirements are shown on Figure 6-12 and the proposed Design Option B shift and associated aerial rights requirements are shown on Figure 6-13, with additional detail as to the public ROW, publicly owned property, and private properties provided in Appendix Q, Design Option B Plan and Profile.

Page 6-28, add the following sentence and revise the last sentence of the page as follows:

Similar to the proposed Project, Design Option B would implement Mitigation Measure TRA-A, which would prohibit right turns on red from westbound Alhambra Avenue to northbound

Alameda Street in order to alleviate potential visibility issues associated with operation of the Alameda Tower.

In addition, similar to the proposed Project, operation of Design Option B would provide additional transit and pedestrian connections, and would result in an overall reduction in VMT, resulting in a beneficial effect on the environment. Therefore, similar to the proposed Project, and with the implementation of Mitigation Measures TRA-A, TRA-B, and TRA-C, impacts with respect to transportation under Design Option B would be less than significant with mitigation.

Page 6-29, revise the first sentence of the second paragraph as follows:

In response to stakeholder feedback, who asked the Project Sponsor to consider a taller Chinatown/State Park Station to increase the height of cabins entering and ~~existing~~ exiting the station along Spring Street, Design Option C consists of a 35-foot overall height increase at the Chinatown/State Park Station.

Page 6-49, revise the fourth paragraph as follows:

Under Design and Use Option E, Mitigation Measure HAZ-A, which requires preparation and submittal to LADBS of a ~~s~~Soil and Groundwater Management Plan prior to any re-grading, decommissioning, or construction activities, would still be required. Implementation of HAZ-A will specify methods for handling and disposal in the event contaminated groundwater is encountered during construction of Design and Use Option E, to reduce impacts to less than significant. Therefore, similar to the proposed Project, impacts with respect to hazards and hazardous materials for the proposed pedestrian bridge under Design and Use Option E would be less than significant with mitigation.

SECTION 7.0 ACRONYMS

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 8.0 LIST OF PREPARERS

Other than the general additions and corrections provided above, no corrections or additions have been made to this section of the Draft EIR.

SECTION 9.0 REFERENCES

The added references below were included on the proposed Project's SB 44 website at the time the Draft EIR was published for public review, but were inadvertently omitted from Section 9.0, References, of the Draft EIR.

Page 9-1, revise before 3.1 Aesthetics Section as follows:

Executive Summary

32 CFR Section 767.8.

California Code of Regulations, Article 4, Sections 1529, 5208, and 1532.

California Code of Regulations, Section 2485.

California Geological Survey Special Publication 117 (as amended).

California Public Resources Code (PRC) Section 21083.2(i).

California State Department of Parks and Recreation, Los Angeles State Historic Park Bike and Pedestrian Bridge Study, Feasibility Study, 2019.

California State Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report, June 2005.

OSHA 29 CFR Sections 1926.62 and 1926.1101.

Public Resources Code 5002.2.

SCAQMD Rule 1403.

Secretary of Interior Standards for Archaeology (36 CFR § 61).

Secretary of Interior’s Standards for the Treatment of Historic Properties (60 FR 35843).

Secretary of the Interior’s Standards and Guidelines for Architectural and Engineering Documentation (68 FR 43159).

1.0 Introduction

49 U.S.C. § 5302(7).

69 FR 78209-78210.

2019 California Green Building Standards Code, available at: https://calgreenenergyservices.com/wp/wpcontent/uploads/2019_california_green_code.pdf.

Cal. Pub. Res. Code § 21168.6.9(a)(1)(A)-(F).

Connect SoCal The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments, Adopted September 3, 2020, Page 10. Available at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176. Accessed March 2022.

Connect SoCal The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. Available at: <https://scag.ca.gov/read-plan-adopted-final-plan>. Accessed September 2022.

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APPENDICES

Other than the general corrections and additions and other applicable corrections provided above, no specific corrections or additions have been made to Appendices A through D, Appendices F through I, Appendices K through M, Appendices O through P, and Appendix R of the Draft EIR. Specific clarifications and/or additions to Appendices E, J, and N are discussed below.

APPENDIX E BIOLOGICAL RESOURCES ASSESSMENT

In addition to the general additions and corrections provided above, revise Appendix E, Biological Resources Assessment, as follows:

Page 19, revise the third to last sentence of the third paragraph as follows:

The Ordinance requires replacement of protected trees at a ~~2:1~~ 4:1 ratio, and the size and number of replacement trees shall approximate the value of the tree to be replaced.

Page 19, add the following footnote to the first sentence of the last paragraph,

A tree inventory report was prepared by Carlberg Associates (2022) for the Project alignment, including the areas along the alignment between Project components, and is included as Appendix B.⁶

Footnote 6: Carlberg Associates prepared an Updated Tree Report on May 11, 2023, which clarified the criteria for inclusion in the report’s tree inventory, and remedies certain counting errors, although the overall number of inventoried trees and the number of protected trees required for removal remain the same as in the March 28, 2022 tree inventory report. The Updated Tree Report is included in Appendix K.1 of the Final EIR.

Page 21, revise the second paragraph as follows:

AECOM biologist Art Popp conducted a field survey of the proposed Project alignment on April 1, 2020, to document and photograph existing biological resources. Weather conditions during the survey included temperatures ranging between 67 to 72 degrees Fahrenheit, clear skies, and wind generally 1 to 3 miles per hour. A ~~follow-up~~ second survey to verify and record tree species occurring within the Project component footprints was conducted on April 24, 2021. A third survey was performed on March 23, 2023 to provide an updated habitat assessment for sensitive species and supplementary wildlife survey effort. This survey effort is discussed in greater detail in Appendix G, Supplemental Biological Resources Report, of the Final EIR. Results of the field surveys were used to determine the presence of biological resources such as sensitive ecological areas, wetlands, wildlife migratory corridors, and/or conserved areas within the Project area and if those areas could potentially support special-status species and sensitive communities identified during the literature review.

Page 40, revise the first sentence of the second paragraph as follows:

~~Both~~ All three field surveys were conducted during the bird breeding season, generally considered to extend from February 1 through September 30, or as early as December or January through July for raptor species.

Page 45, revise the second paragraph as follows:

Table 6-1 presents the number of trees within the Project alignment that would be impacted by construction of the Project and are proposed for removal. These trees are identified as “Protected Trees,” ‘significant’ trees’ as defined by the City’s Planning Division, street trees occurring within the public ROW, trees occurring on Los Angeles State Historic Park property, and trees within the SR-110 Caltrans ROW. Based upon field surveys conducted on April 24, 2021, and a review of the March 28, 2022, tree report, included as Appendix B of Appendix E of the Draft EIR, and the Updated Tree Report, included as Appendix K.1 of the Final EIR, 250 trees along the Project alignment are proposed for removal and 10 trees that were inventoried will be preserved. A list of the trees identified at Project component sites proposed for removal with the diameter at 4.5 feet (DBH), tree height information, canopy spread, health, structure, and regulatory status are provided in Table 10, Appendix B.

Page 47, revise the third paragraph as follows:

The Project would incorporate BIO-PDF-A, which would establish a Tree Protection Zone to protect trees during construction which are not identified to be removed but are either within the construction footprint or in close proximity to the construction footprint. In addition, the Project would incorporate BIO-PDF-F and would comply with applicable tree replacement requirements,

based on the jurisdiction of the property where each tree is located. The Project proposes to would replace trees located on the California Department of Parks and Recreation State property and private property at a 1:1 ratio, with a minimum of 24-inch box tree within the Project area, or at another location within the City.

Page 50, revise section 7.0 Project Design Feature as follows:

7.0 Project Design Features

In addition to those requirements set forth in the regulatory documents, the following Project Design Feature (PDF) provides additional environmental benefits and further reduces risks associated with biological resources: BIO-PDF-A The Project will establish a Tree Protection Zone to protect trees during construction to establish and maintain a healthy environment for all retained trees during the course of construction. The Tree Protection Zone will apply to any trees within the construction footprint or any trees where a portion of their drip line overhangs the construction footprint (i.e., the trunk of a tree may be outside of the construction footprint, but the tree's drip line overhangs the construction footprint). The Tree Protection Zone generally encompasses an area within the drip line of the tree plus an additional 5 feet depending on the species and size of the tree. Any construction activities within the Tree Protection Zone should follow the following guidelines for root protection. For utilities, any required trenching should be routed in such a manner as to minimize root damage. In areas where the grade around the Tree Protection Zone will be lowered, some root cutting may be unavoidable. Cuts should be clean and made at right angles to the roots. When practical, roots will be cut back to a branching lateral root to avoid root damage.

BIO-PDF-B: Avian Collision Mitigation, Monitoring, and Adaptive Management Plan.

The Project Sponsor, in coordination with and subject to the approval of CDFW, shall develop an Avian Collision Mitigation, Monitoring, and Adaptive Management Plan to address the potential for bird collisions. The Plan shall include the following components:

- (1) Monitoring for first 5 years of Project operation: All Project operations and maintenance personnel, including subcontractors, shall undergo training on how to identify and report avian and bat injuries or mortalities detected in the Project area during routine maintenance activities.
- (2) An adaptive management table will be developed, outlining measures to implement upon detection of incidents associated with common species and special status species.
- (3) Annual reporting criteria and requirements.

BIO-PDF-C: Cabin Window Features.

The cabin windows shall be designed with non-transparent (tinted) and/or partially covered with a vinyl window film to be made visible to birds in flight. Reflective surfaces would be reduced as much as possible with opaque or translucent surfaces.

BIO-PDF-D:

The proposed Project shall avoid using any rodenticides and second generation anticoagulant rodenticides during Project activities. Any agreement between the proposed Project and a pest control service provider would include restrictions on the use of rodenticides and second generation anticoagulant rodenticides.

BIO-PDF-E: Tree Disease Management.

Trees scheduled for removal resulting from the Project shall be inspected for contagious tree diseases, including but not limited to: thousand canker fungus (*Geosmithia morbida*), Polyphagous Shot Hole Borer (*Euwallacea spp.*), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2020; UCANR 2020; UCIPM 2013). To avoid the spread of infectious tree diseases, diseased trees shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed. Any agreement between the proposed Project and a tree removal contractor would include the provisions for tree disease management.

BIO-PDF-F:

The proposed Project would comply with applicable tree replacement requirements, based on the jurisdiction of the property where each tree is located, including the following replacement ratios for trees:

- City of Los Angeles:
 - “Protected” Trees: 4:1
 - Non-protected, but “significant” trees, i.e., where the trunk is > 8 inches at 4.5 feet DBH: 1:1
 - “Street trees” in the public ROW: as specified by Urban Forestry Division (typically 2:1)
- California Department of Parks and Recreation: At least 1:1
- Caltrans: Large trees, where the trunk is > 8 inches at 4.5 feet DBH: 1:1

BIO-PDF-G:

Tree removal for the proposed Project would occur outside of the bird nesting season (generally February 1 through September 30) and bat maternity roosting season (generally April 15 through August 31).

BIO-PDF-H:

Any fencing used during and after the proposed Project’s construction would be constructed with materials that are not harmful to wildlife. Prohibited materials should include, but are not limited to, spikes, glass, razor, or barbed wire. Where chain link fences are used, they would utilize scrim, green screen or other such coverage to avoid injuring wildlife. Use of chain link fences would be minimal and would not create barriers to wildlife dispersal. All hollow posts and pipes would be capped to prevent wildlife entrapment and mortality. Metal fence stakes used on the proposed Project site would be plugged to avoid this hazard. Fences would not have any slack that may

cause wildlife entanglement. In addition, workers will be educated and instructed in best practices to avoid attracting wildlife to the construction site, including requiring lids on all trashcans and permitting eating in designated areas or offsite, with daily cleanup of such areas. All workers will be educated on reporting protocols for the appropriate authorities in the event wildlife is encountered on the construction site.

Page 51, revise the first bullet point as follows:

- If roosting bats are determined present during the maternity season (April 15 through August 31), the tree shall be avoided until after the maternity season when the young are self-sufficient.

Page 51, revise the final bullet point as follows:

- Trees with foliage (and without colonial bat roost potential), such as sycamores, that can support lasiurine bats, shall have the two-step tree trimming process occur over one day under the supervision of a qualified bat biologist. Step 1 would be to remove adjacent, smaller, or non-habitat trees to create noise and vibration disturbance that would cause abandonment. Step 2 would be to remove the remainder of the tree on that same day. For palm trees that can support western yellow bat (a special-status bat species documented in the BSA with the potential to occur in the Project area), the two-step tree process shall be used over two days. Western yellow bats may move deeper within the dead fronds during disturbance. The two-day process will allow the bats to vacate the tree before removal.

APPENDIX J GREENHOUSE GAS EMISSIONS TECHNICAL REPORT

In addition to the general additions and corrections provided above, revise Appendix J, Greenhouse gas Emissions Technical Report, as follows:

Page 2, revise the fourth paragraph as follows:

Operational power requirements can be separated into two categories: normal operations and emergency operations. Power requirements for one hundred percent of the power for the Project would be provided by the City of Los Angeles Department of Water and Power's (LADWP's) Green Power Program, as described in GHG-PDF-A, through a connection to their power grid, and would include the power to operate the gondola system and the non-gondola system components (i.e., lights, ventilation, escalators, elevators). When operating at capacity, normal operations are estimated to require a total of approximately 2.5 megawatts of power.

Page 2, revise the sixth paragraph as follows:

The Project's stations, junction, towers, and gondola cabins would incorporate energy efficient, sustainable, water and waste efficient, and resilient features. The proposed stations and junction are designed to be open-air buildings, allowing for passive ventilation strategies and providing direct access to outdoor air and natural daylight, while also providing adequate shade protection from heat. The cabins would be ventilated to enhance air quality for passengers. The electrical power for the Project would be supplied by LADWP through the utility's Green Power Program, as described in GHG-PDF-A. Accordingly, the primary electricity usage associated with the Project would come from renewable resources. In addition, the Project would install backup battery

storage at each station, tower, and junction to provide backup power to allow unloading of the system in the event of a temporary power grid failure.

Page 27, revise the last paragraph as follows:

Project-related electricity use can result in indirect emissions, due to electricity generation activities occurring at off-site power plant locations. For this Project, the electrical power for operation of the aerial gondola system and associated stations, junction, and towers would be supplied by LADWP under the utility’s Green Power Program, as described in GHG-PDF-A. As a result, the primary electricity usage associated with the Project would come from renewable resources.

Page 32, revise the sixth paragraph as follows:

The emissions reduced associated with the Project’s commitment to obtaining power through LADWP’s Green Power Program, as described in GHG-PDF-A, was quantified using the expected power consumption of the aerial gondola system and the GHG intensity factors for LADWP’s standard power portfolio. The emissions of GHGs reduced were converted to CO2e using global warming potentials from the Intergovernmental Panel on Climate Change Fourth Assessment Report and are shown in **Table 4-8**.

Table 4-8: GHG Emissions Reduced Associated with Gondola System Electricity Usage, revise table note 5 as follows:

⁵ Emissions are shown as negative to represent the emissions benefit gained by the Project by committing to LADWP’s Green Power Program, as described in GHG-PDF-A, which is supplied by 100% renewable resources.

Table C-1, revise row 1 as follows:

1	California Renewables Portfolio Standard (RPS) and SB 350	As most recently amended by SB 100 (2018), California’s RPS increases the proportion of electricity from renewable sources to 33 percent renewable power by 2020; 50 percent renewable power by 2026; and, 60 percent renewable power by 2030. SB 350 (2015) also requires the State Energy Resources Conservation and Development Commission to double (by 2030) the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.	<p>Consistent. Although this goal is not applicable to an individual transportation project, the electrical power for the operation of the Project’s aerial gondola system and associated stations, junction, and towers would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility’s Green Power Program, <u>as described in GHG-PDF-A</u>. As such, the primary electricity usage associated with the Project would come from renewable resources. Furthermore, the Project would incorporate energy efficient features, such as open-air stations and high-efficiency lighting. As a result, the Project would not impair implementation of the state’s RPS or the energy efficiency and conservation targets of SB 350.</p> <p>LADWP is a municipal electricity generation service provider. In 2017, LADWP developed its own Power Strategic Long-Term Resource Plan (SLTRP) as an outline for supplying energy in accordance with the state’s renewable energy goals. (See https://www.ladwp.com/ladwp/faces/wcnav_externalId/afpdoc?_adf.ctrl-state=rmkf94oql_25&_afLoop=764064428747531.)</p>
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Table C-2, revise row 1 as follows:

<p>SB 350</p>	<p>Reduce GHG emissions in the electricity sector through the implementation of the 50 percent Renewables Portfolio Standard (RPS), doubling of energy savings, and other actions as appropriate to achieve GHG emissions reductions planning targets in the Integrated Resource Plan (IRP) process.</p>	<p>Consistent. Although this goal is not applicable to an individual transportation project, the electrical power for the operation of the Project's aerial gondola system and associated stations, junction, and towers would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, <u>as described in GHG-PDF-A</u>. As such, the primary electricity usage associated with the Project would come from renewable resources. Furthermore, the Project would incorporate energy efficient features, such as open-air stations and high-efficiency lighting. As a result, the Project would not impair implementation of the state's RPS or the energy efficiency and conservation targets of SB 350.</p> <p>LADWP is a municipal electricity generation service provider. In 2017, LADWP developed its own Power Strategic Long-Term Resource Plan (SLTRP) as an outline for supplying energy in accordance with the state's renewable energy goals. (See https://www.ladwp.com/ladwp/faces/wcnav_externalId/afpdoc?_adf.ctrl-state=rmkf94oql_25&_afLoop=764064428747531.)</p>
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Table C-4, revise row 1 as follows:

<p>E-1 Renewable Energy Procurement</p>	<p>Expand use of renewable energy in electricity procurement (100% renewable electricity by 2035)</p>	<p>Consistent. Although this goal is not applicable to an individual transportation project, the electrical power for the operation of the Project's aerial gondola system and associated stations, junction, and towers would be supplied by the City of Los Angeles Department of Water and Power (LADWP) through the utility's Green Power Program, <u>as described in GHG-PDF-A</u>. As such, the primary electricity usage associated with the Project would come from renewable resources.</p> <p>LADWP is a municipal electricity generation service provider. In 2017, LADWP developed its own Power Strategic Long-Term Resource Plan (SLTRP) as an outline for supplying energy in accordance with the state's renewable energy goals. (See https://www.ladwp.com/ladwp/faces/wcnav_externalId/afpdoc?_adf.ctrl-state=rmkf94oql_25&_afLoop=764064428747531.)</p>
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Table C-4, revise row 2 as follows:

<p>F-1 Photovoltaic Installations</p>	<p>Increase on-site solar photovoltaic installations</p>	<p>Consistent. The Project supports use of renewable power generation and use by committing to use green power from LADWP's Green Power Program, <u>as described in GHG-PDF-A</u>. As such, the primary electricity usage for the Project would come from renewable resources.</p>
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APPENDIX N RIDERSHIP MODEL DEVELOPMENT MEMORANDUM

In addition to the general additions and corrections provided above, revise Appendix N, Ridership Model Development Memorandum, as follows:

Page 2, revise the second paragraph as follows:

For example, driving costs include the cost of gas and parking at Dodger Stadium, which averaged around \$25.00 per vehicle in 2019. Transit costs include the cost of fares, such as Metro’s \$1.75 one way fare, and assuming no fare to ride the proposed Project for 84 Dodger games/events at Dodger Stadium each year. Both driving and taking transit take time, which will depend on where people going to a Dodger Game start their trip, levels of congestion, and the transportation mode that they take. For example drive time to Dodger Stadium gates from zip code 91103 (Old Pasadena) is approximately 25 minutes, with an additional 15 minutes for vehicles to make it through the parking gates to a parking space. Transit to Union Station takes approximately 22 minutes, with an additional 25 minutes for riders to get to the Dodger Stadium Express and ride to Dodger Stadium. The proposed Project is expected to save about 15 minutes of transit travel time in total.

Page 7, revise the last row as follows:

Transit	The model transit fare assumption for Metro was \$1.75 per ride, and the 2019 Metrolink distance-based fare for each station origin within a particular zip code were included in the model calculated transit travel cost. <u>The model assumes no fare to ride the proposed Project for 84 Dodger games/events at Dodger Stadium each year.</u>	\$1.75 (2019)	\$1.75 (2019)
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5.3 EFFECT OF CORRECTIONS AND ADDITIONS

The Final EIR documents changes to the Draft EIR. As demonstrated by the following discussion, the modifications to the Draft EIR do not result in new significant impacts and do not warrant recirculation of the Draft EIR. 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 information contained in this section and Section 6.0, Responses to Comments, of this Final EIR, clarifies, amplifies, or makes insignificant changes to the Draft EIR. Section 6.0, Responses to Comments, of this Final EIR, fully considers and responds to comments claiming that the proposed Project would have significant impacts or more severe 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. In addition, the information added to the Draft EIR is not significant because the Draft EIR is not changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the proposed Project. Rather, as provided by the following discussion, the corrections and additions to the Draft EIR 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 Section 15088.5 of the CEQA Guidelines are met.

General Corrections and Additions

The general corrections and additions above do not constitute new significant information resulting in new or more severe significant environmental impacts. The general corrections and additions provide an analysis of the proposed Project’s consistency with recently approved land use plans for informational purposes, minor technical revisions based on new naming conventions for Metro transit lines, confirmation of the LADWP’s ability to provide power for the proposed Project through the LADWP’s Green Power Program, and otherwise confirmed the inclusion of mobility hub at Dodger Stadium Station. The Dodger Stadium Station mobility hub was included within the Draft EIR’s analysis. The general corrections and additions also note that the CEQA streamlining provisions provided in SB 44 were extended subsequent to the release of the Draft EIR in SB 91, but no substantive provisions in SB 44 were

altered, and accordingly references to SB 44 also refer to SB 91. The general corrections and additions also provided additional information regarding the proposed Project's Additional Separation Buffer, that was described in the Draft EIR's Project Description and included in its analysis. Thus, no new impacts would result from these general corrections and additions.

Aesthetics

As set forth in the general corrections and additions above, in response to comments on the Draft EIR, updated and additional KOPs were prepared to support evaluation of potential impacts of the proposed Project on aesthetics and visual resources. The supplemental KOPs were updated to clarify certain design elements of the proposed Project, and additional visual simulations were also provided. As discussed in Section 5.1, above, the evaluation of updated and additional KOPs for the proposed Project does not result in significant impacts, and the aesthetic impacts of the proposed Project would be less than significant. Thus, no new impacts would result and impacts would continue to be less than significant.

Agriculture and Forestry Resources

There are no text changes proposed to Section 3.02, Agriculture and Forestry Resources, of the Draft EIR, other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Air Quality

There are no text changes proposed to Section 3.03, Air Quality, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Biological Resources

Text changes constitute minor corrections or clarifications to the Draft EIR, including to clarify the criteria for the Tree Inventory Report's inventory and to update the inventory accordingly, to reference an additional survey conducted in responses to comments received on the Draft EIR, and to provide additional clarifying analysis that expands upon the analysis in the Draft EIR based on comments received. The changes otherwise incorporate additional Project Design Features at CDFW's request that provide additional environmental benefits for biological resources, and the additional survey confirmed the analysis provided in the Draft EIR. The additional clarifications also expand upon the analysis provided in the Draft EIR, and do not alter any of the Draft EIR's conclusions. The general corrections and additions also provided additional information regarding the proposed Project's Additional Separation Buffer, that was described in the Draft EIR's Project Description and included in its analysis. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Cultural Resources

Text changes constitute minor corrections or clarifications to the Draft EIR, including to recognize that preservation in place is the preferred manner of mitigating impacts to archaeological sites in the applicable mitigation measures. This revision is consistent with CEQA Guidelines section 15126.4(b), and merely restates an existing requirement. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Energy

There are no text changes proposed to Section 3.06, Energy, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Geology and Soils

Text changes constitute minor corrections or clarifications to the Draft EIR. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Greenhouse Gas Emissions

Text changes constitute minor corrections or clarifications to the Draft EIR, including to incorporate a prior proposed Project commitment to obtain power through LADWP's Green Power Program in a Project Design Feature, GHG-PDF-A. Thus, no new impacts would result and impacts would continue to be less than significant.

Hazards and Hazardous Materials

Text changes constitute minor corrections or clarifications to the Draft EIR, including to revise Mitigation Measure HAZ-A to clarify that the Soil and Groundwater Management Plan shall be submitted to the LADBS for review prior to the commencement of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The addition also recognizes that MM-HAZ-A requires full compliance with all applicable local, state, and federal regulations (including but not limited to, as applicable, OSHA Safety and Health Standards, Cal/OSHA requirements, federal, state and local waste disposal regulations, SCAQMD Rule 1166, as well as any other applicable requirements of the California Department of Toxic Substances, the Los Angeles Regional Water Quality Control Board, and the City of Los Angeles) related to the identification, excavation, transportation, and disposal of hazardous materials, including those encountered in excavated soil and dewatered groundwater. Further, Appendix M, Potential Excavated Material Disposal Analysis, of this Final EIR, provides additional, clarifying information regarding potential disposal of excavated material. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Hydrology and Water Quality

There are no text changes proposed to Section 3.10, Hydrology and Water Quality, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Land Use and Planning

As set forth in the general corrections and additions above, additions include analysis of the proposed Project's consistency with various land use plans. Under CEQA Guidelines section 15125(d), an EIR must discuss "any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans," and does not require a discussion where the proposed project would be consistent with such plans. Accordingly, the Draft EIR was not required to discuss consistency with each and every

plan or policy, and the consistency analysis has been provided for informational purposes. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Mineral Resources

There are no text changes proposed to Section 3.12, Mineral Resources, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Noise

Text changes constitute minor corrections or clarifications to the Draft EIR, including to revise Mitigation Measure VIB-A to specify that the vibration monitoring equipment would be placed at a distance of “approximately 26 feet” rather than “at least 26 feet” from the Avila Adobe (1970s addition), El Grito Mural and The Old Winery. The general corrections and additions above include a discussion of Appendix L, 3S Sound Measurements Memo, of the Final EIR, is a memorandum from Leitner Poma providing additional detail on the operational noise from the 3S gondola system in Tyrol, Austria at the Stubai Glacier. This memorandum was provided as an update to a prior memorandum from Leitner Poma about its 3S gondola system, which is included in the Noise Measurement Detail at p. A-24 in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. Appendix L, 3S Sound Measurements Memo, of the Final EIR provides additional detail about the Leitner Poma 3S gondola system but does not change any of the information previously provided as part of the Noise Measurement Detail at p. A-24 in Appendix M, Noise and Vibration Technical Report, of the Draft EIR. Thus, no new or more severe significant impacts would result and construction impacts would continue to be significant and unavoidable as set forth in the Draft EIR and operational impacts would continue to be less than significant as set forth in the Draft EIR.

Population and Housing

There are no text changes proposed to Section 3.14, Population and Housing, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Public Services

There are no text changes proposed to Section 3.15, Public Services, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant.

Parks and Recreational Facilities

Text changes to Section 3.16, Parks and Recreational Facilities, of the Draft EIR include minor typographical corrections in addition to the general corrections and additions outlined above. Thus, no new impacts would result and impacts would continue to be less than significant.

Transportation

As set forth in the general corrections and additions above, revisions include refinements to Mitigation Measure TRA-A to identify the mitigation for each identified location, consistent with the analysis in the

Draft EIR, and to incorporate TRA-PDF-A, to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility. In addition, the general corrections and additions provide an analysis of the proposed Project's consistency with recently approved land use plans for informational purposes, minor technical revisions based on new naming conventions for Metro transit lines and clarification regarding ridership model assumptions, and otherwise confirmed the inclusion of mobility hub at Dodger Stadium Station following additional consultation with the Los Angeles Dodgers. The Dodger Stadium Station mobility hub was included within the Draft EIR's analysis. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Tribal Cultural Resources

There are no text changes proposed to Section 3.18, Tribal Cultural Resources, of the Draft EIR other than those outlined in the general corrections and additions described above. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Utilities and Service Systems

Text changes constitute minor corrections or clarifications to the Draft EIR, including to incorporate a prior proposed Project commitment to obtain power through LADWP's Green Power Program in a Project Design Feature, GHG-PDF-A. Thus, no new impacts would result and impacts would continue to be less than significant with mitigation.

Wildfire

Text changes constitute minor corrections or clarifications to the Draft EIR to fix typographical errors. In addition, to the general corrections and additions outlined above, the general additions include an overview of Appendix J, Reax Memo re Attorney General Guidance to the Final EIR, which provides a discussion of the Draft EIR analysis' consistency with the October 2022 Attorney General guidance for lead agencies to analyze and mitigate wildfire risks under CEQA for informational purposes. Thus, no new impacts would result and impacts would continue to be less than significant.

Alternatives

Text changes constitute minor corrections or clarifications to the Draft EIR, including to correct minor typographical errors in the proposed Project impacts summary, to add additional information regarding the TSM Alternative, to add additional information regarding an alternative that was considered but dismissed from further consideration (the Pedestrian Enhancement Alternative) because it would not meet most of the project objectives to the same degree as the proposed Project, and to provide additional information related to biological resources, hazards, and transportation related to the adoption of additional project design features and refinements to mitigation measures described above. In addition, clarifying revisions have been provided for the Spring Street Alignment Alternative's Mitigation Measure TRA-A to specify the visibility enhancements required to mitigate geometric hazards for site visibility for pedestrians. Further, to provide additional environmental benefits and as a best practice to further enhance pedestrian visibility, the Spring Street Alignment Alternative would also incorporate TRA-PDF-A, which would stripe a high visibility crosswalk and provide upgraded lighting for the driveway crossing south of the Los Angeles State Historic Park. Thus, no new impacts would result and no new feasible alternatives have been identified.

Other CEQA Considerations

Text changes constitute minor corrections or clarifications to the Draft EIR, including to add a discussion of project design features and make clarifications consistent with those described above for Mitigation Measure HAZ-A, and to add a discussion regarding Chavez Ravine and the Project Sponsor's commitment to develop an interpretation plan with stakeholder groups. This addition merely expands upon information provided in the Draft EIR for informational purposes. The general corrections and additions also provide an overview of how the proposed Project would not impair or impact potential recreational uses of the Alameda Triangle anticipated by The California Endowment, as well as how the proposed Project alignment would not require aerial rights requirements over 130 West College Street, where subsequent the publication of the Draft EIR, an application for an office building was filed. Thus, no new impacts would result.

Design and Use Options

Text changes constitute minor corrections or clarifications to the Draft EIR, including to provide specific information regarding the extent of parking removal under Design Option A. Parking is not a required transportation analysis under CEQA, and the additions provide an analysis of consistency with the Dodger Stadium CUP, concluding that Design Option A is consistent with the requirements of the Dodger Stadium CUP and similar to the proposed Project and with the implementation of Mitigation Measure LUP-A, impacts with respect to land use would be less than significant with mitigation. In addition, the Final EIR provides additional detail as to the public ROW, publicly owned property, and private properties for Design Options A and B in Appendix P, Design Option A Plan and Profile and Appendix Q, Design Option B Plan and Profile, respectively. Thus, no new impacts would result.

Other Sections

Text changes to other sections of the Draft EIR constitute minor corrections or clarifications, or are otherwise consistent with the revisions outlined above, and do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR.

Appendices

Text changes to the Draft EIR's appendices constitute minor corrections or clarifications, or are otherwise consistent with the revisions outlined above, and do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR.

Conclusion

Based on the above, the corrections and additions, which include proposed refinements to the proposed Project, do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR. In addition, the corrections and additions to the Draft EIR clarify, amplify or make insignificant refinements to the Draft EIR. Further, for many issue areas, the proposed corrections and additions would reduce impacts set forth in the Draft EIR. Thus, recirculation of the Draft EIR is not required.