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

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

This section of the Final EIR provides changes to the Draft EIR that have been made to revise, clarify, or correct the environmental impact analysis for the 2045 Violet Street Project (the Project). Such changes are a result of public and agency comments received in response to the Draft EIR and/or additional information that has become available since publication of the Draft EIR. The changes described in this section do not result in the Project creating any new or increased significant environmental impacts.

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

A. Corrections and Additions to Draft EIR Sections and Appendices

Additional changes have been made to the Draft EIR as a result of public and agency comments received in response to the Draft EIR and/or new information that has become available since publication of the Draft EIR. Deletions are shown in ~~strikethrough text~~ and additions are shown in <u>underlined text</u>. Such changes are presented by EIR section.

I. Executive Summary

Section I, Executive Summary, page I-6, revise the third sentence of the last paragraph as follows:

> Lot 2, located at the northwestern corner of the Project Site (2030 E. 7th Street) is developed with a five-story, ~~163,804~~ <u>208,573</u>-square-foot, 604-stall vehicle parking garage with a rooftop level.

Section I, Executive Summary, page I-9, revise the eighth sentence of the first paragraph as follows:

The precise uses and development plan for the Future Campus Expansion Phase are not known at this ~~Time~~ time.

Section I, Executive Summary, page I-9, insert the following after the ninth sentence of the first paragraph:

Such applications would be subject to subsequent environmental review at the time such applications are filed and considered by the City.

Section I, Executive Summary, page I-11, revise the second sentence of the third full paragraph and add a new sentence as follows:

~~The~~ In its initial phase, the Project would also provide ~~240~~ 147 bicycle parking spaces under the 7th Place driveway scenario or ~~220~~ 146 bicycle parking spaces under the Violet Street driveway scenario, as required by the LAMC. In the Future Campus Expansion Phase, the Project would provide an additional 93 bicycle parking spaces under the 7th Place Driveway Scenario or an additional 74 bicycle parking spaces under the Violet Street Driveway Scenario.

Section I, Executive Summary, pages I-19 and I-20, revise Project Design Feature TR-PDF-1 as follows:

Project Design Feature TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan will be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include, but not necessarily be limited to, the following measures:

- Provide notification in advance of construction to the immediately adjacent properties and Los Angeles Unified School District Facilities within 0.5 miles of the Project Site;
- As traffic lane, parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures and otherwise provide for pedestrian and bicycle safety. Measures included in the worksite traffic control plan(s) may include, if and as identified by the applicant and determined by LADOT based on the specific construction activities occurring at a given

point in time: protection barriers for pedestrians and bicyclists, temporary traffic control and flaggers, and the posting of signage along roads identifying construction traffic access or flow limitations due to single lane conditions during periods of truck traffic, if needed;

- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction;
- Provide off-site truck staging in a legal area furnished by the construction truck contractor;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences;
- Coordinate with Metro Bus Operations Control Special Events Coordinator and Metro's Stops and Zones Department not later than 30 days before the start of Project construction;
- Accommodate all equipment staging and worker parking on-site to the extent feasible;
- 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; and
- Describe the haul truck routes and avoid haul truck routes that travel passed Los Angeles Unified School District facilities.

II. Project Description

Section II, Project Description, page II-2, add the following after the third sentence of the first full paragraph:

Such applications would be subject to subsequent environmental review at the time such applications are filed and considered by the City.

Section II, Project Description, page II-4, revise the third sentence of the first paragraph as follows:

Lot 2, located at the northwestern corner of the Project Site (2030 E. 7th Street) is developed with a five-story, ~~163,804~~ 208,573-square-foot, 604-stall vehicle parking garage with a rooftop level.

Section II, Project Description, page II-7, revise the second sentence of the last partial paragraph as follows:

As shown in Revised Table II-1 on page ~~II-8~~ III-5 of the Final EIR, the Project proposes a new 13-story (including mechanical penthouse)~~, a maximum~~ 450,599-square-foot commercial building, comprised of up to 435,100 square feet of office uses, 15,499 square feet of ground floor retail and/or restaurant uses, and 1,264 automobile parking spaces in one at-grade, two above-grade, and four below-grade parking levels within Lot 1 of the Project Site, located at the southwestern corner of the Project Site.[1]

Section II, Project Description, page II-8, replace Table II-1 with Revised Table II-1 on page III-5:

Revised Table II-1
Summary of Proposed Floor Area within the Project Site (Including Existing Plus New Floor Area)[a]

Use	Existing	Proposed Demolition	Proposed Construction	Net New Floor Area	Total Floor Area (Existing Plus New)
Retail/Restaurant (Initial Phase and Future Campus Expansion Phase)	0 sf	0 sf	15,499 sf (Initial Phase) 20,000 sf (Future Campus Expansion Phase)[d]	15,499 sf (Initial Phase) 20,000 sf[d] (Future Campus Expansion Phase)	15,499 sf (Initial Phase) 20,000 sf[d] (Future Campus Expansion Phase)
Office (Project and Existing)	254,735 sf[b]	(9,940) sf	435,100 sf	425,160 sf[c]	679,895 sf
Office (Future Campus Expansion Phase)	21,880 sf	(21,880) sf	~~211,201~~ 191,201 sf[d]	~~189,321~~ 169,321 sf[e]	~~211,201~~ 191,201 sf
Warehouse	25,798 sf	(25,798) sf	0 sf	(25,798) sf	0 sf
Total	**302,413 sf**	**57,618 sf**	**661,800 sf**	**604,182 sf**	**906,595 sf**

sf = square feet

[a] *Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. LAMC Section 12.03 defines floor area as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.*

[b] *Includes the existing 244,795-square-foot Warner Music Group building and the 9,940-square-foot office use at 2045 E. Violet Street. The Warner Music Group building includes ancillary café uses, but these are not open to the public and are considered part of the office use.*

[c] *425,160 square feet reflects the net new floor area for the proposed office use in the Initial Phase (435,100 - 9,940 = 425,160).*

[d] *~~As noted above, because restaurant uses result in greater water demand than office uses, unless otherwise noted, this Draft EIR, analyzes 191,201 square feet of office uses and 20,000 square feet of restaurant uses.~~ This Draft EIR analyzes 211,201 square feet of development within the Future Campus Expansion Phase. In all cases, this includes at least 191,201 square feet of office uses. The remaining 20,000 square feet may be developed as either office or restaurant uses. The Draft EIR analyzes the worst-case impact for each environmental issue. For example, because restaurant uses result in greater water demand than office uses, water supply impacts of 191,201 square feet of office and 20,000 square feet of restaurant are analyzed in the Draft EIR.*

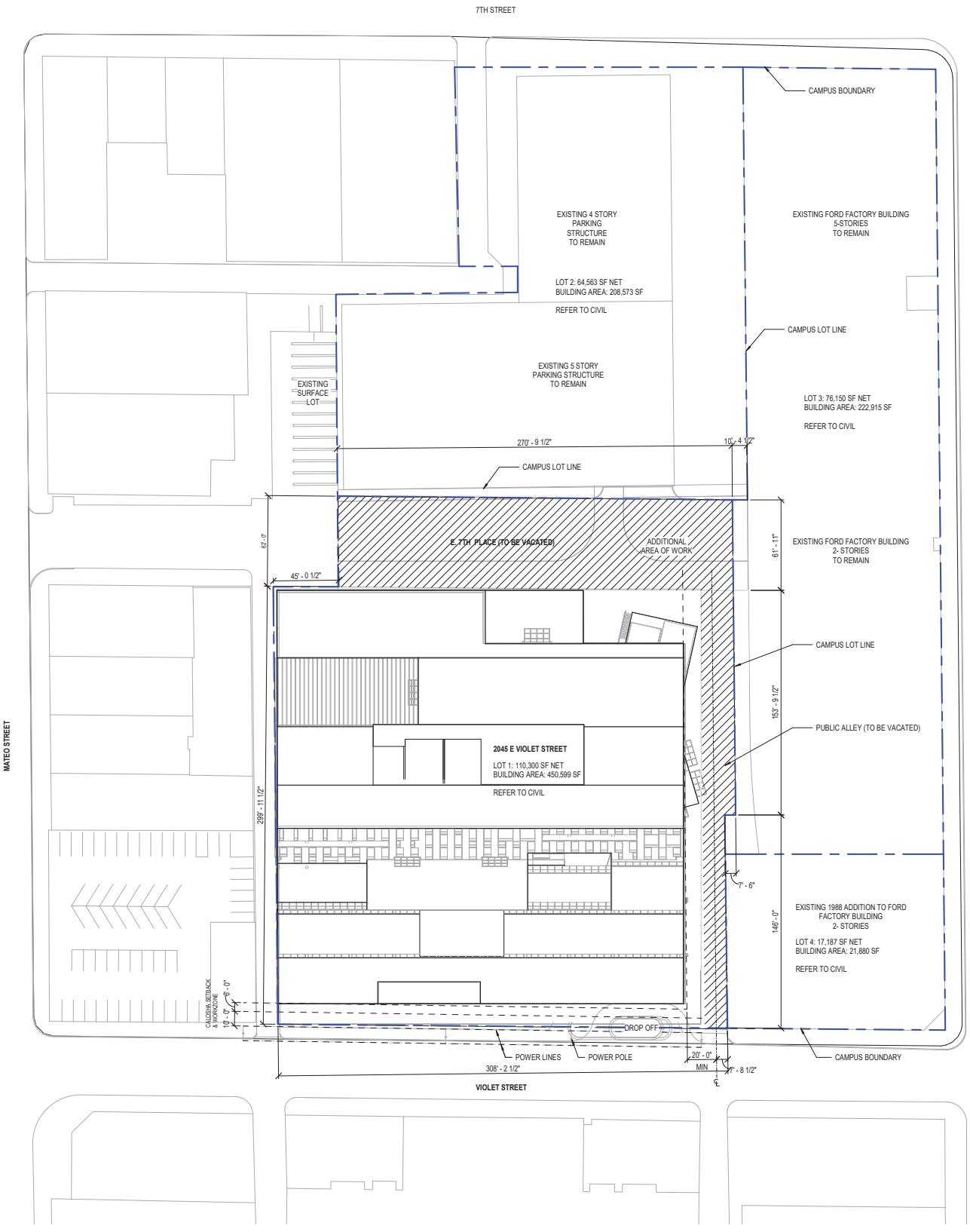
[e] *~~189,321 square feet reflects the net new floor area for the Future Campus Expansion Phase (211,201 – 21,880 = 189,321).~~169,321 square feet reflects the net new floor area for the Future Campus Expansion Phase (191,201 – 21,880 = 169,321). This figure may be adjusted to the limited extent described in footnote d above.*

Source: Hines, 2021.

Section II, Project Description, page II-8, insert the following paragraph after the first partial paragraph:

> As shown in Figure II-4 on page II-11, the proposed building's ground floor would include the retail and office uses including an outdoor dining area, courtyard, and parking. As shown in Figure II-5 on page II-12, the existing alley would be vacated to make way for the proposed paseo which is shown in Figure II-6 on page II-13. Above the ground level, Levels 2 through 11 would include additional office uses with balconies. Additionally, Levels 4 and 12 would include office uses with a roof deck. Mechanical equipment would be located on the roof level above office level 12.

Section II, Project Description, page II-9, replace Figure II-3 with Revised Figure II-3 on page III-7.



Revised Figure II-3
Conceptual Site Plan

Source: Rios, 2023.

Section II, Project Description, page II-10, revise the seventh full sentence of the first partial paragraph as follows:

> The precise uses and development plan for the Future Campus Expansion Phase are not known at this ~~Time~~ time.

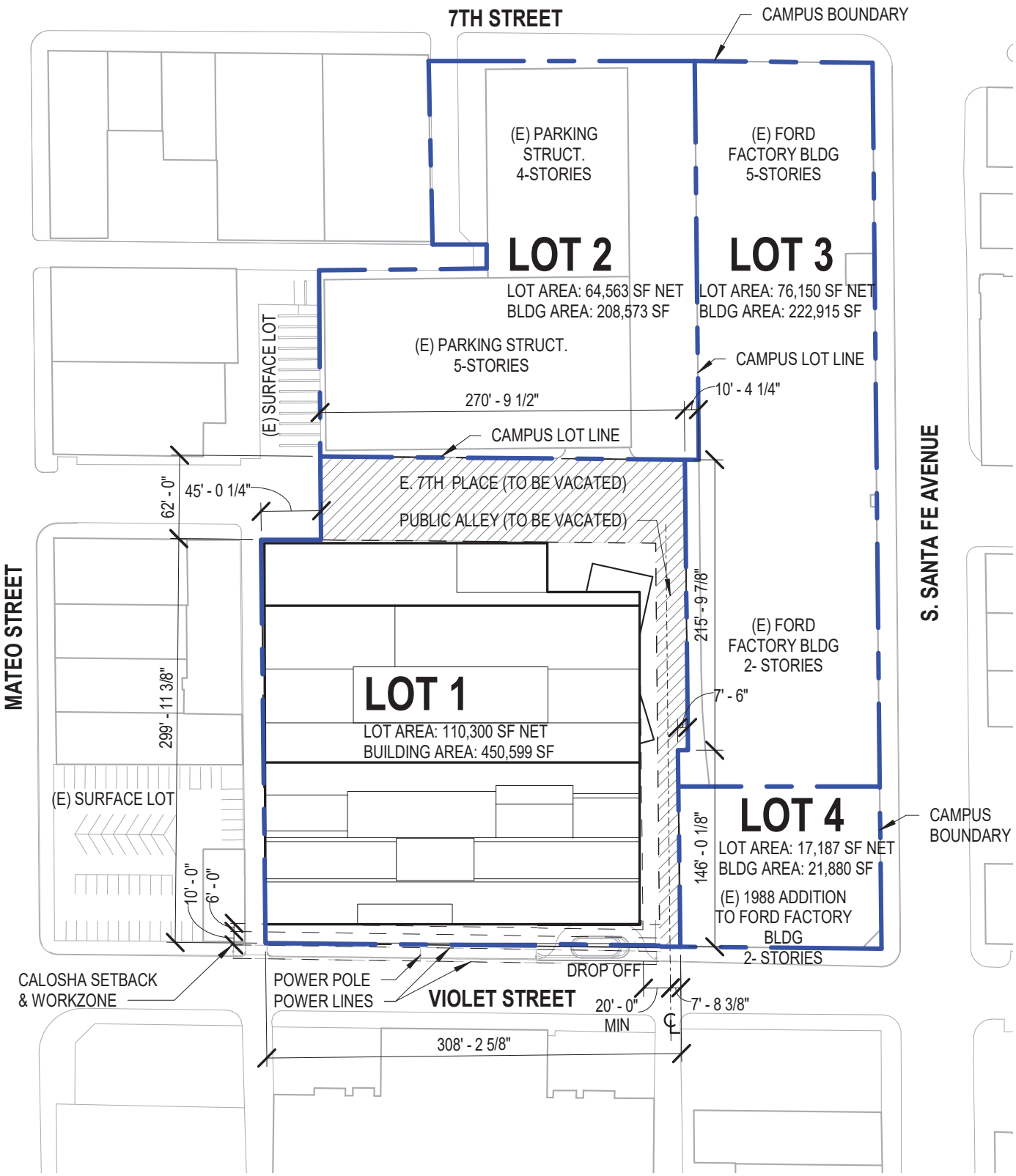
Section II, Project Description, page II-10, revise the eleventh full sentence of the first partial paragraph as follows:

> The Project's environmental analysis analyzes ~~an~~ office and restaurant uses (which are both uses authorized by the M3-1-RIO zone) in order to provide a conservative analysis.

Section II, Project Description, page II-10, delete the first full paragraph as follows:

> ~~As shown in Figure II-4 on page II-11, the proposed building's ground floor would include the retail and office uses including an outdoor dining area, courtyard, and parking. As shown in Figure II-5 on page II-12, the existing alley would be vacated to make way for the proposed paseo which is shown in Figure II-6 on page II-13. Above the ground level, Levels 2 through 11 would include additional office uses with balconies. Additionally, Levels 4 and 12 would include office uses with a roof deck. Mechanical equipment would be located on the roof level above office level 12.~~

Section II, Project Description, page II-12, replace Figure II-5 with Revised Figure II-5 on page III-9.



Revised Figure II-5
Lot Line Diagram

Source: Rios, 2023.

Section II, Project Description, page II-16, revise the second sentence of the fourth paragraph and add a new sentence as follows:

> ~~The~~ In its initial phase, the Project would also provide ~~240~~ 147 bicycle parking spaces under the 7th Place driveway scenario or ~~220~~ 146 bicycle parking spaces under the Violet Street driveway scenario, as required by the LAMC. In the Future Campus Expansion Phase, the Project would provide an additional 93 bicycle parking spaces under the 7th Place Driveway Scenario or an additional 74 bicycle parking spaces under the Violet Street Driveway Scenario.

IV.A. Air Quality

Section IV.A, Air Quality, page IV.A-56, replace Table IV.A-7 with Revised Table IV.A-7 on page III-11:

Revised Table IV.A-7
Estimate of Maximum Regional Project Daily Operational Emissions—At Project Buildout (2026)[a]

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Project Winter Emission						
Area	~~14~~ **22**	<1	~~<1~~ **11**	<1	<1	<1
Energy (Natural Gas)	<1	~~<1~~ **2**	~~<~~1	<1	<1	<1
Mobile	20	16	146	<1	14	3
Stationary	<1	1	1	<1	<1	<1
Total Proposed Uses Emissions	~~35~~ **43**	~~18~~ **19**	~~147~~ **159**	<1	14	3
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	~~(20)~~ **(12)**	~~(37)~~ **(36)**	~~(403)~~ **(391)**	**(150)**	**(136)**	**(52)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Summer Emission						
Area	~~22~~ **30**	<1	~~48~~ **59**	<1	<1	<1
Energy (Natural Gas)	<1	~~<1~~ **2**	~~<~~1	<1	<1	<1
Mobile	21	15	159	<1	14	3
Stationary	<1	1	1	<1	<1	<1
Total Proposed Uses Emissions	~~44~~ **51**	~~17~~ **18**	~~209~~ **220**	<1	14	3
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	~~(11)~~ **(4)**	~~(38~~ **)(37)**	~~(341)~~ **(330)**	**(150)**	**(136)**	**(52)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] *The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix C (CalEEMod Output) of this Draft EIR. The table reflects net emissions (i.e., Project emissions less existing emissions).*

Source: Eyestone Environmental, 2023.

Section IV.A, Air Quality, page IV.A-63, replace Table IV.A-9 with Revised Table IV.A-9 below.

Revised Table IV.A-9
Estimate of Maximum Localized Project Daily Operational Emissions—At Project Buildout (2026)[a]
(pounds per day)

Emission Source[b]	NO_X	CO	PM_{10}	$PM_{2.5}$
Winter Emissions				
Area	<1	~~<1~~ **11**	<1	<1
Energy (Natural Gas)	~~<1~~ **2**	~~<1~~ **1**	<1	<1
Stationary	1	1	<1	<1
On-Site Total	~~2~~ **3**	~~2~~ **13**	<1	<1
SCAQMD Significance Threshold[c]	**120**	**1,872**	**4**	**2**
Over/(Under)	**~~(118)~~ (117)**	**~~(1,871)~~ (1,859)**	**(4)**	**(2)**
Exceed Threshold?	**No**	**No**	**No**	**No**
Summer Emissions				
Area	<1	~~48~~ **59**	<1	<1
Energy (Natural Gas)	~~<1~~**2**	~~<1~~ **1**	<1	<1
Stationary	1	1	<1	<1
On-Site Total	~~2~~ **4**	~~50~~ **62**	<1	<1
SCAQMD Significance Threshold[c]	**120**	**1,872**	**4**	**2**
Over/(Under)	**~~(118)~~ (116)**	**~~(1,822)~~ (1,811)**	**(3)**	**(2)**
Exceed Threshold?	**No**	**No**	**No**	**No**

Numbers may not add up exactly due to rounding.

[a] The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix C (CalEEMod Output) of this Draft EIR. The table reflects net emissions (i.e., Project emissions less existing *emissions*).

[a] *Note that the emissions breakdown in Appendix C of this Draft EIR is the same as regional.*

[c] *The SCAQMD Daily Significance Thresholds are based on the 5-acre Project Site. The closest sensitive receptors are residential uses southwest of the Project Site. The localized threshold is based on a 25 meter receptor distance which is the closest receptor distance on the SCAQMD mass rate LST look-up table. Calculations of the localized thresholds are provided in Appendix C of this Draft EIR.*

Source: Eyestone Environmental, 2023.

IV.C. Energy

Table IV.C-2 (Summary of Annual Net New Energy Use During Project Operation), page IV.C-25, add the following text at the end of footnote a:

> [a] *Detailed calculations are provided in Appendix F of this Draft EIR. Totals may not add up due to rounding. Project energy demand is all net new. As shown on page 12 of Appendix F of the Draft EIR, restaurant uses have a higher energy demand than office uses. Therefore, this analysis conservatively includes 626,301 square feet of office uses and 35,499 square feet of restaurant uses).*

Section IV.C, Energy, page 42, revise the first sentence of the second paragraph as follows:

> The Project also would introduce new job opportunities (generated from the proposed ~~15,499~~ 35,499 square feet of retail and/or restaurant uses and up to ~~646,301~~ 626,301 square feet of general office uses including the Future Campus Expansion Phase) within an HQTA, which is consistent with numerous policies in the 2020–2045 RTP/SCS related to locating new jobs near transit.[79],[79a]

> [79a] *As shown on page 12 of Appendix F of the Draft EIR, restaurant uses have a higher energy demand than office uses. Therefore, this analysis conservatively includes 626,301 square feet of office uses and 35,499 square feet of restaurant uses.*

IV.D. Greenhouse Gas Emissions

Section IV.D, Greenhouse Gas Emissions, page IV.D-65, revise the first sentence of the second full paragraph as follows:

> As discussed previously, the Project proposes ~~15,499~~ 35,499 square of retail/restaurant uses and up to ~~646,301~~ 626,301 square feet of general office uses (including the Future Campus Expansion Phase) within an HQTA, which is defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 miles of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours (see Section IV.E, Land Use and Planning, of this Draft EIR for further details).

Section IV.D, Greenhouse Gas Emissions, page IV.D-70, revise the first sentence of the first paragraph as follows:

Although L.A.'s Green New Deal is not directly applicable to private development projects, the Project would generally be consistent with these aspirations as it is an infill development consisting of ~~15,499~~ 35,499 square of retail/restaurant uses and up to ~~646,301~~ 626,301 square feet of general office uses (including the Future Campus Expansion Phase) on a Project Site located 0.11 mile<u>s</u> from Metro bus lines 18 and 62 along with Metro bus line 60 located approximately 0.04 mile<u>s</u> southeast and the DASH City West bus stop located approximately 0.58 mile<u>s</u> northwest.

Section IV.D, Greenhouse Gas Emissions, page IV.D-75, revise the third sentence of the first paragraph and replace Table IV.D-9 with Revised Table IV.D-9 on page III-15 as follows:

As shown in Revised Table IV.D-9 on page ~~IV.D-76,~~ III-15 of the Final EIR, the Project, at full buildout, is expected to result in a net ~~decrease~~ increase of ~~39~~ 60 $MTCO_2e$ per year from area sources.

Revised Table IV.D-9
Annual GHG Emissions Summary (Buildout)[a]
(metric tons of carbon dioxide equivalent [$MTCO_2e$])

Scope	Buildout Without Reducing Measures	Buildout with Reducing Measures	Percent Reduction from Measures (Buildout)[b]
Area[c]	~~(66)~~ (60	~~(66)~~ (60)	0%
Energy[d]	~~3,228~~ 4,242	~~3,228~~ 4,242	−0%
Mobile[e]	8,054	6,222	−23%
EV Chargers[f]	(213)	(213)	---
Stationary[g]	23	23	0%
Solid Waste[h]	~~55~~ 72	~~55~~72	0%
Water/Wastewater[i]	~~281~~ 391	~~281~~ 329	~~0~~16%
Refrigeration	(104)	(104)	0%
Construction	142	142	0%
Total Emissions	~~11,504~~ 12,666	~~9,610~~ 10,772	~~−16%~~ −15%

Numbers may not add up exactly due to rounding.

[a] *CO_2e was calculated using CalEEMod and the results are provided in the CalEEMod output file within Appendix C of this Draft EIR. Totals may not add up due to rounding.*

[b] *Certain GHG reduction measures and regulations discussed above in the consistency analysis are not readily quantifiable and were not included as part of the emissions inventory. In addition, some reduction measures are implemented over time such as RPS, LCFS and fuel economy standards. Although the Project accounted for RPS, LCFS, and fuel economy standards at Project buildout year, emissions do not reflect increased standards for later years. Therefore, Project emissions presented are conservative and would be lower in future years.*

[c] *Area source emissions are from landscape equipment and fireplaces in common areas.*

[d] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates. Emissions from electricity generation only take into account carbon intensity at build out year and do not take into account decreasing carbon intensity in subsequent years required by SB 100 (RPS). However, it is recognized that the RPS would require utilities to supply 60-percent renewable energy by 2030.*

[e] *Emissions were calculated with CalEEMod which includes EMFAC2017 emission factors. EMFAC2017 does not take account for further reductions in GHG emission as the result of implementation of LCFS amendments. Mobile source emissions also do not account for increasing fuel economy standards for future years.*

[f] *Emissions were calculated consistent with the requirements of code requirements for EV chargers which requires that 10 percent of parking spaces be equipped with EV chargers.*

[g] *Stationary source emissions are from an on-site emergency generator.*

[h] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*

[i] *Water/Wastewater emissions under the "Without Reducing Measures" are calculated based on CalEEMod default water consumption rates. The CalEEMod estimate of water consumption is considered conservative compared to more current water demand rates used by LADWP~~, and takes~~. The latter takes into account Project Design Feature WAT-PDF-1, which is reflected in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR and is reflected in the "With Reducing Measures" column of this Table.*

Source: Eyestone Environmental, 2023.

Section IV.D, Greenhouse Gas Emissions, page IV.D-78, revise the third paragraph as follows:

> As shown in Revised Table IV.D-9 on page ~~IV.D-76,~~ III-15 of the Final EIR, Project GHG emissions from electricity and natural gas usage would result in a total of ~~3,228~~ 4,242 $MTCO_2e$ per year.

Section IV.D, Greenhouse Gas Emissions, page IV.D-79, revise the last sentence of the fourth paragraph as follows:

> As shown in Revised Table IV.D-9, Project GHG emissions from solid waste generation would result in a total of ~~55~~ 72 $MTCO_2e$ per year which accounts for a 76-percent recycling/diversion rate.

Section IV.D, Greenhouse Gas Emissions, page IV.D-81, revise the first sentence of the second paragraph as follows:

> As shown in Revised Table IV.D-9 on page ~~IV.D-76,~~ III-15 of the Final EIR, Project GHG emissions from water/wastewater usage would result in a total of ~~219~~ 329 $MTCO_2e$ per year, which accounts for a ~~20~~16-percent reduction in water/wastewater emissions with implementation of Project Design Feature WAT-PDF-1 provided in Section IV.J.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR as compared to the Project without project design features.

Section IV.D, Greenhouse Gas Emissions, page IV.D-81, revise the third paragraph as follows:

> As shown in Revised Table IV.D-9, when taking into consideration implementation of relevant project design features, as well as the requirements set forth in the City of Los Angeles Green Building Code, and full implementation of current State mandates, the Project's GHG emissions for the Project in 2026 would equal 142 $MTCO_2e$ per year (amortized over 30 years) during construction and ~~9,468~~ 10,630 $MTCO_2e$ per year during operation of the Project with a combined total of ~~9,610~~ 10,772 $MTCO_2e$ per year.

IV.E. Land Use and Planning

Section IV.E, Land Use and Planning, page IV.E-21, revise the second sentence of the first full paragraph as follows:

Specifically, the Project would include 1,264 vehicle parking spaces within one at-grade, two above-grade, and four below-grade levels and ~~156 bicycle parking spaces, including 99 long-term spaces and 57 short-term spaces~~, in its initial phase, 147 bicycle parking spaces (i.e., 95 long-term/52 short-term) under the 7th Place Driveway Scenario or 146 bicycle parking spaces (i.e., 95 long-term/51 short-term) under the Violet Street Driveway Scenario in bicycle parking facilities accessible from the at-grade parking level via the lobby. In the Future Campus Expansion Phase, the Project would provide an additional 93 bicycle parking spaces under the 7th Place Driveway Scenario or an additional 74 bicycle parking spaces under the Violet Street Driveway Scenario.

Section IV.E, Land Use and Planning, page IV.E-22, revise the fourth sentence of the last paragraph beginning on the page as follows:

In addition, the Project would encourage alternative transportation choices by improving the pedestrian experience on adjacent streets and ~~156 bicycle parking spaces on-site~~, in its initial phase, providing 147 bicycle parking spaces (i.e., 95 long-term/52 short-term) under the 7th Place Driveway Scenario or 146 bicycle parking spaces (i.e., 95 long-term/51 short-term) under the Violet Street Driveway Scenario. In the Future Campus Expansion Phase, the Project would provide an additional 93 bicycle parking spaces under the 7th Place Driveway Scenario or an additional 74 bicycle parking spaces under the Violet Street Driveway Scenario.

IV.H. Transportation

Section IV.H, Transportation, pages IV.G-26 and IV.H-27, revise Project Design Feature TR-PDF-1 as follows:

Project Design Feature TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan will be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include, but not necessarily be limited to, the following measures:

- Provide notification in advance of construction to the immediately adjacent properties and Los Angeles Unified School District Facilities within 0.5 miles of the Project Site;
- As traffic lane, parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be

developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures and otherwise provide for pedestrian and bicycle safety. Measures included in the worksite traffic control plan(s) may include, if and as identified by the applicant and determined by LADOT based on the specific construction activities occurring at a given point in time: protection barriers for pedestrians and bicyclists, temporary traffic control and flaggers, and the posting of signage along roads identifying construction traffic access or flow limitations due to single lane conditions during periods of truck traffic, if needed;

- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during construction;
- Provide off-site truck staging in a legal area furnished by the construction truck contractor;
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences;
- Coordinate with Metro Bus Operations Control Special Events Coordinator and Metro's Stops and Zones Department not later than 30 days before the start of Project construction;
- Accommodate all equipment staging and worker parking on-site to the extent feasible;
- 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; and
- Describe the haul truck routes and avoid haul truck routes that travel passed Los Angeles Unified School District facilities.

Section IV.H, Transportation, page IV.H-28, revise the third sentence of the last paragraph as follows:

Under this scenario, the Project will provide ~~156~~ 147 bicycle parking spaces (~~57~~ 52 short-term and ~~99~~ 95 long-term) as part of the first phase of

development and will provide an additional ~~84~~ 93 bicycle parking spaces as part of the Future Campus Expansion Phase for a total of 240 bicycle parking spaces.

Section IV.H, Transportation, page IV.H-28, revise the sixth sentence of the last paragraph as follows:

Under this scenario, the Project will provide ~~156~~ 146 bicycle parking spaces (~~57~~ 51 short-term and ~~99~~ 95 long-term) as part of the first phase of development and an additional ~~64~~ 74 bicycle parking spaces as part of the Future Campus Expansion Phase for a total of 220 bicycle parking spaces.

Appendix C: Air Quality and Greenhouse Gas Emissions

Appendix C, pages 21 and 22, replace worksheets with new worksheets on pages III-20 and III-21.

Appendix C, page 297, replace worksheet with new worksheet on page III-22.

2045 Violet

Air Quality Emissions Summary Winter

AQ SUMMARY OF EMISSIONS WINTER

Construction Emissions (Unmitigated)

Regional (Daily) Unmitigated	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
2023	5	76	56	<1	13	6
2024	40	32	47	<1	5	2
2025	39	31	46	<1	5	2
MAX	40	76	56	<1	13	6
Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Difference	**(35)**	**(24)**	**(494)**	**(150)**	**(137)**	**(49)**
Impact	**No**	**No**	**No**	**No**	**No**	**No**

Localized (Daily) Unmitigated	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
2023		41	41		5	3
2024		26	28		<1	<1
2025		25	28		<1	<1
MAX		41	41		5	3
Threshold		120	1872		16	8
Difference		**(79)**	**(1,831)**		**(11)**	**(5)**
Impact		**No**	**No**		**No**	**No**

Operation Emissions (Without Project Design Features)

Existing Regional Emissions (Existing Year)	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Area	7	<1	<1	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	10	9	75	<1	5	1
Emergency Generator	<1	<1	<1	<1	<1	<1
Total	17	11	76	<1	5	1

Existing Regional Emissions (Buidout Year)	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Area	7	<1	<1	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	7	6	54	<1	5	<1
Emergency Generator	<1	<1	<1	<1	<1	<1
Total	15	7	55	<1	5	1

Existing Uses to Remain Regional Emissions (Buidout Year)	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Area	8	<1	11	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	<1	<1	<1	<1	<1	<1
Emergency Generator	<1	<1	<1	<1	<1	<1
Total	8	1	12	<1	<1	<1

Project Regional Emissions (Buildout Year)	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Area	22	<1	<1	<1	<1	<1
Energy	<1	2	2	<1	<1	<1
Mobile	28	22	200	<1	19	4
Emergency Generator	<1	1	1	<1	<1	<1
Total	50	25	203	<1	19	4

Regional Emissions (Buildout Year)	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Area	22	<1	11	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	20	16	146	<1	14	3
Emergency Generator	<1	1	1	<1	<1	<1
Total	**43**	**19**	**159**	**<1**	**14**	**3**
Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Difference	**(12)**	**(36)**	**(391)**	**(150)**	**(136)**	**(52)**
Impact	No	No	No	No	No	No

Project Localized (Buildout Year)					
Onsite Total	3	13		<1	<1
Threshold	**120**	**1872**		**4**	**2**
Difference	**(117)**	**(1859)**		**(4)**	**(2)**
Impact	**No**	**No**		**No**	**No**

2045 Violet

Air Quality Emissions Summary Summer

AQ SUMMARY OF EMISSIONS SUMMER

Construction Emissions (Unmitigated)

Regional (Daily) Unmitigated	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
2023	5	75	56	<1	13	6
2024	3	24	37	<1	5	2
2025	40	38	61	<1	6	2
MAX	40	75	61	<1	13	6
Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Difference	**(35)**	**(25)**	**(490)**	**(150)**	**(137)**	**(49)**
Impact	**No**	**No**	**No**	**No**	**No**	**No**

Localized (Daily) Unmitigated	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
2023		41	41		5	3
2024		18	19		<1	<1
2025		32	38		1	<1
MAX		41	41		5	3
Threshold		120	1872		16	8
Difference		**(79)**	**(1,831)**		**(11)**	**(5)**
Impact		**No**	**No**		**No**	**No**

Operation Emissions (Without Project Design Features)

Existing Regional Emissions (Existing Year)	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Area	11	<1	24	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	10	8	82	<1	5	1
Emergency Generator	<1	<1	<1	<1	<1	<1
Total	21	10	107	<1	5	1

Existing Regional Emissions (Buidout Year)	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Area	11	<1	24	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	8	5	59	<1	5	<1
Emergency Generator	<1	<1	<1	<1	<1	<1
Total	19	7	84	<1	5	1

Existing Uses to Remain Regional Emissions (Buidout Year)	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Area	8	<1	11	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	<1	<1	<1	<1	<1	<1
Emergency Generator	<1	<1	<1	<1	<1	<1
Total	8	1	12	<1	<1	<1

Project Regional Emissions (Buildout Year)	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Area	34	<1	72	<1	<1	<1
Energy	<1	2	2	<1	<1	<1
Mobile	28	20	218	<1	19	4
Emergency Generator	<1	1	1	<1	<1	<1
Total	62	24	293	<1	19	4

Regional Emissions (Buildout Year)	ROG	NO_x	CO	SO2	PM_{10}	$PM_{2.5}$
Area	30	<1	59	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Mobile	21	15	159	<1	14	3
Emergency Generator	<1	1	1	<1	<1	<1
Total	**51**	**18**	**220**	**<1**	**14**	**3**
Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Difference	**(4)**	**(37)**	**(330)**	**(150)**	**(136)**	**(52)**
Impact	No	No	No	No	No	No

Project Localized (Buildout Year)						
Onsite Total		4	62		<1	<1
Threshold		**120**	**1872**		**4**	**2**
Difference		**(116)**	**(1811)**		**(3)**	**(2)**
Impact		**No**	**No**		**No**	**No**

2045 Violet

Operational Emissions Summary (GHG)

CalEEMod Output Summary	Project with no PDFs	Project with PDFs	
Baseline (Baseline Year)[a]	**CO_2e**	**CO_2e**	
Area	11	11	
Energy (Natural Gas)	1,725	1,725	
Mobile	2,581	2,581	
Emergency Generators	0	0	
Solid Waste	21	21	
Water/Wastewater	169	169	
Refrig.	114	114	
Total	4,622	4,622	
Baseline (Buildout Year)[a]	**CO_2e**	**CO_2e**	
Area	12	12	
Energy (Natural Gas)	1,295	1,295	
Mobile	2,323	2,323	
Emergency Generators	0	0	
Solid Waste	21	21	
Water/Wastewater	140	140	
Refrig.	114	114	
Total	3,905	3,905	
Baseline (Existing Uses to Remain (Buildout Year)	**CO_2e**	**CO_2e**	
Area	21	21	
Energy (Natural Gas)	1,014	1,014	
Mobile	0	0	
Emergency Generators	0	0	
Solid Waste	17	17	
Water/Wastewater	110	110	
Refrig.	0	0	
Total	1,162	1,162	
Buildout (Buildout Year)[b]			
Area	51	51	
Energy (Natural Gas and Electricity)[b]	4,523	4,523	
Mobile	10,377	8,545	
Electric Vehicle Charging Credit	(213)	(213)	
Emergency Generators	23	23	
Solid Waste	76	76	
Water/Wastewater	421	359	
Refrig.	10	10	
Construction	142	142	
Total	**15,409**	**13,515**	
Buildout with Existing Uses to Remain (Buildout Year)[b]			
Area	72	72	
Energy (Natural Gas and Electricity)[b]	5,537	5,537	
Mobile	10,377	8,545	
Electric Vehicle Charging Credit	(213)	(213)	
Emergency Generators	23	23	
Solid Waste	93	93	
Water/Wastewater	531	469	
Refrig.	10	10	
Construction	142	142	
Total	**16,571**	**14,677**	
Project (Buildout less Baseline)			
Area	60	60	
Energy (Natural Gas and Electricity)	4,242	4,242	
Mobile	8,054	6,222	
Electric Vehicle Charging Credit	(213)	(213)	
Emergency Generators	23	23	
Solid Waste	72	72	
Water/Wastewater	391	329	
Refrig.	(104)	(104)	
Construction	142	142	
Total	**12,666**	**10,772**	(1,894)

[a] Existing Uses

[b] Please refer to CalEEMod outputs for Future uses

Appendix H: Land Use Tables

Appendix H, page 2, revise the fourth sentence of the consistency analysis for Objective 3.2 and Policy 3.2.3 as follows:

> Furthermore, in its initial phase, the Project would provide ~~a total of 156 bicycle parking spaces~~ 147 bicycle parking spaces (i.e., 95 long-term/ 52 short-term) under the 7th Place Driveway Scenario or 146 bicycle parking spaces (i.e., 95 long-term/51 short-term) under the Violet Street Driveway Scenario. In the Future Campus Expansion Phase, the Project would provide an additional 93 bicycle parking spaces under the 7th Place Driveway Scenario or an additional 74 bicycle parking spaces under the Violet Street Driveway Scenario.

Appendix H, page 8, revise the consistency analysis for Policy 3.5 as follows:

> The Project would support this policy by providing ~~156~~ bicycle parking spaces as required by code in an area well-served by public transit, including multiple Metro bus lines, one LADOT DASH line, and the Metro L Line (Gold).

Appendix H, page 8, revise the first sentence of the consistency analysis for Policy 3.8 as follows:

> The Project would provide ~~a total of 156 bicycle parking spaces, consisting of 99 long-term spaces and 57 short-term spaces~~ 147 bicycle parking spaces (i.e., 95 long-term/52 short-term) under the 7th Place Driveway Scenario or 146 bicycle parking spaces (i.e., 95 long-term/ 51 short-term) under the Violet Street Driveway Scenario. In the Future Campus Expansion Phase, the Project would provide an additional 93 bicycle parking spaces under the 7th Place Driveway Scenario or an additional 74 bicycle parking spaces under the Violet Street Driveway Scenario.

Appendix H, page 16, revise the fifth sentence of the consistency analysis for "Increase person and goods movement and travel choices within the transportation system" as follows:

> The Project would also promote bicycle use through the provision of ~~a total of 156~~ bicycle parking spaces as required by code for Project uses.

Appendix H, page 17, revise the second sentence of the consistency analysis for "Support healthy and equitable communities" as follows:

As discussed above, the Project would promote alternative methods of transportation through the provision of ~~a total of 156 secure bicycle parking spaces for Project uses~~ 147 bicycle parking spaces (i.e., 95 long-term/ 52 short-term) under the 7th Place Driveway Scenario or 146 bicycle parking spaces (i.e., 95 long-term/51 short-term) under the Violet Street Driveway Scenario. In the Future Campus Expansion Phase, the Project would provide an additional 93 bicycle parking spaces under the 7th Place Driveway Scenario or an additional 74 bicycle parking spaces under the Violet Street Driveway Scenario.

B. Effect of Corrections and Revisions

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

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

> *(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:*
>
> *(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
>
> *(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*

> *(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.*
>
> *(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)*
>
> *(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.*

The information contained in this section clarifies, amplifies, or refines information in the Draft EIR but does not make any changes that would meet the definition of "significant new information" as defined above. The information added to the Draft EIR does not change the Draft EIR in a way that deprives the public of a meaningful opportunity to comment upon a new or substantially increased significant environmental effect of the Project or disclose a feasible alternative or mitigation measure the Applicant has declined to adopt.

Specifically, the revisions above primarily include corrections of minor errors in the Draft EIR, as well as clarifications related to the Project's two phases. With respect to the revisions and corrections to air quality and greenhouse gas emissions, while these result in an increase in emission levels, impacts would remain less than significant. Therefore, these additions and corrections do not affect the analysis in the Draft EIR and would not result in new significant impacts or increase the impacts of the Project. These revisions would also not constitute feasible mitigation measures considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Project but the Applicant declines to adopt it.

Therefore, the additions and corrections contained in this section and the information contained in Section II, Responses to Comments, of this Final EIR, clarify, amplify, or make insignificant changes to the Draft EIR. In addition, Section II, Responses to Comments, of this Final EIR, fully considers and responds to comments stating that the Project would have significant impacts not disclosed in the Draft EIR and demonstrates that none of these comments provided substantial evidence that the Project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR. Rather, the additions and corrections to the Draft EIR address typographical errors, provide minor revisions, and augment the analysis of the Draft EIR and would not result in new

significant impacts or an increase in any impact already identified in the Draft EIR. Thus, none of the conditions in CEQA Guidelines Section 15088.5 are met and recirculation of the Draft EIR is not required.