

# **I. Introduction**

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15089, the City of Los Angeles, the Lead Agency, must prepare a Final EIR before approving a project. The purpose of this Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies regarding the Modera Argyle Project Draft EIR. Pursuant to CEQA Guidelines Section 15132, this Final EIR includes revisions to the Draft EIR; a list of persons, organizations, and agencies that provided comments on the Draft EIR; and responses to comments received regarding the Draft EIR. In addition, the Final EIR includes a Mitigation Monitoring Program.

This Final EIR constitutes the second part of the EIR for the Project and is intended to be a companion to the Draft EIR. The Draft EIR for the Project, which circulated for public review and comment from April 18, 2019, through June 3, 2019, constitutes the first part of the EIR and is incorporated by reference and bound separately. (Refer to Volumes 1 through 7 of the Draft EIR).

## 1. Organization of the Final EIR

This Final EIR is organized into four main sections as follows:

**Section I. Introduction**—This section provides an introduction to the Final EIR.

**Section II. Responses to Comments**—This section presents a matrix of the parties that commented on the Draft EIR and the issues that they raised. This matrix is followed by verbatim numbered copies of the comments followed by numbered responses to each of the written comments made regarding the Draft EIR. Copies of the full original comment letters are provided in Appendix FEIR-1 of this Final EIR.

**Section III. Revisions, Clarifications, and Corrections**—This section provides a list of revisions that have been made to the Draft EIR for the Project based on comments received from the public and agencies and other items requiring revisions.

These changes are minor and do not add significant new information that would affect the analysis or conclusions presented in the Draft EIR. Section 15088.5(a) of the CEQA Guidelines specifically states:

*New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:*

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

CEQA Guidelines Section 15088.5(b) provides that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

As demonstrated in this Final EIR, neither the comments submitted on the Draft EIR, the responses to these comments, nor the corrections and additions presented in Section III of this Final EIR, constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

**Section IV. Mitigation Monitoring Program (MMP)**—This section provides the full MMP for the Project. The MMP lists project design features and mitigation measures by environmental topic and identifies for each of the features and measures the applicable enforcement agency, monitoring agency, monitoring phase, monitoring frequency, and action indicating compliance.

This Final EIR also includes the following appendix:

**Appendix FEIR-1. Draft EIR Comment Letters**—This appendix to the Final EIR includes copies of all written comments received on the Draft EIR.

## 2. Public Review Process

In accordance with CEQA, the environmental review process for the Project commenced with solicitation of comments from identified responsible and trustee agencies, as well as interested parties on the scope of the Draft EIR, through a Notice of Preparation (NOP) process. The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research (OPR), responsible agencies, and other interested parties on August 18, 2017, for a 30-day review period. A Revised NOP was circulated on August 23, 2017 to correct an error regarding the Public Scoping Meeting date. The Initial Study, NOP, Revised NOP, and NOP comment letters are included in Appendix A of the Draft EIR.

Consistent with the requirements of Sections 15087 and 15105 of the CEQA Guidelines, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was circulated for a 46-day public comment period commencing on April 18, 2019, and ending on June 3, 2019. Following the Draft EIR public comment period, this Final EIR has been prepared that includes responses to the comments raised regarding the Draft EIR.