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 1111 Sunset Project (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 underlined text. Such changes are presented by EIR section.

I. Executive Summary

Volume 1, Section I, Executive Summary, subsection 9, Summary of Environmental Impacts, page I-14, revise Section L, Transportation, of Table I-1 as follows:

L. TRANSPORTATION			
Conflict with Plans	Less Than Significant		
Vehicle Miles Traveled	Less Than Significant with Mitigation		
Hazardous Design Features	Less Than Significant		
Emergency Access	Less Than Significant		
Freeway Safety Analysis	Less Than Significant		

Volume 1, Section I, Executive Summary, subsection 10.b., page I-15, revise Project Design Feature HAZ-PDF-1 as follows:

Project Design Feature HAZ-PDF-1: Project buildings would be designed and placed in a manner so as to not significantly impede future access to the locations of the existing wells—as depicted in CalGEM's maps.

Volume 1, Section I, Executive Summary, subsection 10.c., page I-15, revise Project Design Feature NOI-PDF-6 as follows:

Project Design Feature NOI-PDF-6: The occupancy for the Elysian Parking outdoor roof deck will be limited to 150 people.

The occupancy limitation shall be indicated on a sign that is readily visible within the outdoor roof deck.

Volume 1, Section I, Executive Summary, subsection 10.e., beginning on page I-16, add three bullets after the last bullet of Project Design Feature TR-PDF-1 as follows:

- Identification of a construction manager and provision of a telephone number and email address for any inquiries or complaints from community members regarding construction activities. The telephone number and email address shall be posted at the Project Site in a location that is readily visible to any interested party throughout the construction process.
- The construction manager shall provide advance notification to Castelar Elementary School and Nightingale Middle School of upcoming construction activities.
- Pedestrian/bicycle connections to the bus stops shall remain unblocked. If a bus stop is temporarily relocated during construction, advance notification of alternative bus stop sites and the temporary location of the relocated stop shall be provided to public.

Volume 1, Section I, Executive Summary, subsection 10.e., beginning on page I-17, delete Project Design Feature TR-PDF-2 (note that this Project Design Feature has been converted to new Mitigation Measure TR-MM-1, below):

Project Design Feature TR-PDF-2: The Project shall include the following TDM measures to further reduce VMT:

- Unbundled Parking/Parking Cash-Out: The Project would provide unbundling parking, which requires residents and tenants to specifically opt-in to a parking lease (unbundled parking) and requires companies to refund the cost of parking to employees who opt-out (parking cash-out).
- Promotions and Marketing: The Project shall include a transportation management coordinator (TMC) on the building management staff to promote the benefits of TDM. The TMC will provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, rideshare/carpool/ vanpool programs, and parking incentives.
- <u>Ride-Share Program</u>: The <u>Project shall participate in</u> the <u>Downtown Transportation Management</u> Organization (TMO), which would help to match employees with similar commutes into ride-share programs.
- <u>First-Mile/Last-Mile Options:</u> The Transportation Center at the Project Site shall support services that address first-mile/last-mile connectivity issues with public transit.
- Pedestrian Network Improvements: The Project shall widen sidewalks on all sides of the Project Site to meet Mobility Plan standards. The Project shall install a new pedestrian crosswalk with continental crosswalk markings across Sunset Boulevard at White Knoll Drive with the installation of a traffic signal at that location. The Project shall also install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue.

Volume 1, Section I, Executive Summary, subsection 11, Mitigation Measures, page I-25, revise Mitigation Measure HAZ-MM-3 as follows:

Mitigation Measure HAZ-MM-3: A soil and site management plan will be developed and Draft Soil and Site Management Plan, included in Appendix V of the Final EIR, will be implemented to ensure all on-site contaminated soil is properly disposed of at an appropriate, permitted disposal or treatment facility and to address the potential

identification and abandonment of oil wells if encountered during earthwork activities.

- The soil management plan <u>Draft Soil and Site Management Plan</u> shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities.
- As part of the soil management plan Draft Soil and Site Management Plan, a licensed Petroleum Engineer, and/or his/her designee, in his or her reasonable discretion, shall be present on the Project Site during grading and excavation activities in the suspected locations of the wells and shall be on call at other times to monitor compliance with the soil and site management plan Draft Soil and Site Management Plan

Volume 1, Section I, Executive Summary, subsection 11, Mitigation Measures, page I-27, add Mitigation Measure TR-MM-1 as follows:

g. Transportation

<u>Mitigation Measure TR-MM-1:</u> The Project shall include the following <u>TDM measures to further reduce VMT:</u>

- Unbundled Parking/Parking Cash-Out: The Project would provide unbundled parking, which requires residents and tenants to specifically opt-in to a parking lease (unbundled parking) and requires companies to refund the cost of parking to employees who opt-out (parking cash-out).
- Promotions and Marketing: The Project shall include a transportation management coordinator (TMC) on the building management staff to promote the benefits of TDM. The TMC will provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, rideshare/carpool/ vanpool programs, and parking incentives.
- Ride-Share Program: The Project shall participate in the Downtown Transportation Management Organization (TMO), which would help to match employees with similar commutes into ride-share programs.

- <u>First-Mile/Last-Mile Options:</u> The Transportation
 <u>Center at the Project Site shall support services that address first-mile/last-mile connectivity issues with public transit.

 </u>
- Pedestrian Network Improvements: The Project shall widen sidewalks on all sides of the Project Site to meet Mobility Plan standards. The Project shall install a new pedestrian crosswalk with continental crosswalk markings across Sunset Boulevard at White Knoll Drive with the installation of a traffic signal at that location. The Project shall also install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue.

Volume 1, Section I, Executive Summary, subsection 11, Mitigation Measures, page I-27, revise heading 11.g. as follows:

g. h. Tribal Cultural Resources

Volume 1, Section I, Executive Summary, subsection 11, Mitigation Measures, page I-27, revise bullet 1 of Mitigation Measure TCR-MM-1 as follows:

- Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project;¹⁴ and (2) OHR.
- It should be noted that in the event that any human remains affiliated with the Gabrielino Indians are encountered during Project construction, Mr. Robert Dorame (chair of the Gabrielino Tongva Indians of California Tribal Council) or current chair would be notified. Additionally, the chair of tribe would be notified if any cultural remains, deposits, or artifacts pertaining to the Gabrielino or Tongva were to be found during construction even if a Most Likely Descendant has been designated from another tribe.

Volume 1, Section I, Executive Summary, subsection 11, Mitigation Measures, page I-28, revise bullet 3 of Mitigation Measure TCR-MM-1 as follows:

3. The Applicant, or its successor, shall implement the tribe's recommendations of the qualified archaeologist retained

by the City and paid for by the Applicant, in consultation with the tribal monitor, reasonably concludes that the tribe's recommendations are reasonable and feasible.

Volume 1, Section I, Executive Summary, subsection 12, page I-32, revise as follows:

Additionally, Alternative 2 would not avoid the Project's significant and unavoidable cumulative regional air quality impacts during construction; cumulative construction noise impacts from on-site and off-site noise sources; and cumulative vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance. In addition, since this Alternative would result in a greater average household VMT per capita and a greater average work VMT per employee than the No-Hotel Development Scenario, both development scenarios, Alternative 2 would result in a greater impact associated with VMT. The remaining impacts would be similar to or less than those of the Project.

II. Project Description

No corrections or additions have been made to this section of the Draft EIR.

IV.A. Air Quality

Volume 1, Section IV.A, Air Quality, subsection 3.d.(1)(c), page IV.A-49, revise Policy 4.2.5 of Table IV.A-4 as follows:

Policy	4.2.5:	Emphasize	trip	reduction,		
alternati	ive transit	and congesti	on ma	anagement		
measures for discretionary projects.						

Consistent. The Project would occupy an infill location within 0.25 mile of existing public transportation, which would help to promote transit usage and in turn reduce the number of vehicle trips to and from the Project Site. In addition, the Mixed Use Development Scenario would provide 436 bicycle parking spaces, including 99 short-term spaces and 337 long-term spaces. The No-Hotel Development Scenario would provide 421 bicycle parking spaces, including 340 long-term and 81 short-term spaces.

Furthermore, with the implementation of Mitigation Measure TR-MM-1, the Project would develop and implement a Transportation Demand Management (TDM) program to promote non-auto travel and reduce the use of single-occupant vehicle trips for residents and office employees.^a

1111 SunsetFinal Environmental Impact Report

Consistent with LADOT methodology, VMT reducing measures and TDM are not included in the Project's Transportation Assessment. In order to account for these measures within the air quality,

greenhouse gas and energy analyses, a separate VMT analysis was prepared. As part of this separate VMT analysis, VMT reducing measures were accounted for as mitigation measures.

Source: Eyestone Environmental, 2020.

IV.B. Cultural Resources

No corrections or additions have been made to this section of the Draft EIR.

IV.C. Energy

No corrections or additions have been made to this section of the Draft EIR.

IV.D. Geology and Soils

No corrections or additions have been made to this section of the Draft EIR.

IV.E. Greenhouse Gas Emissions

Volume 1, Section IV.E, Greenhouse Gas Emissions, subsection 2.c.(2)(a), page IV.E-11, add to the end of the discussion as follows:

In October 2020, CARB released a study which evaluated three scenarios that achieve Carbon Neutrality in California by 2045. The study will be used by CARB in development of the 2022 Scoping Plan update.^{21A} More ambitious carbon reduction scenarios that achieve carbon neutrality prior to 2045 may be considered as part of future analyses by the State.

The scenarios analyzed to achieve carbon neutrality include a High Carbon Dioxide Removal (CDR) scenario, Zero Carbon Energy scenario, and a Balanced scenario. The High CDR scenario achieves GHG reductions by relying on CO2 removal strategies. The Zero Carbon Energy scenario is based on the assumption of zero-fossil fuel emissions by 2045. The Balanced scenario represents a middle point between the High CDR scenario and Zero Carbon Energy scenario. The scenarios would achieve at least an 80-percent reduction in GHGs by 2045, relative to 1990 levels. The Zero Carbon Energy scenario and Balanced scenario would not require CDR. However, the remaining CO2e (80 percent to 100 percent) would be reduced to zero by applying carbon dioxide removal strategies, including sinks from natural and working lands and negative emissions technologies like direct air capture. 21B

Under each of these scenarios, CARB proposed reduction strategies for various sectors that contribute GHG emissions throughout the State. Although specific details are not yet available for the GHG reduction measures discussed above, implementation of these measures would require regulations to be enforced by the State.

Volume 1, Section IV.E, Greenhouse Gas Emissions, subsection 2.c.(3)(b), page IV.E-30, add to the end of the discussion as follows:

As discussed on page IV.E-30 of the Draft EIR, the 2020–2045 RTP/SCS was adopted by SCAG subsequent to both circulation of the Notice of Preparation (NOP) for the Project on May 21, 2018, and approval by LADOT of the Transportation Assessment for the Project on August 8, 2020, thus the GHG section and Draft EIR provided detailed analysis of Project consistency with the 2016–2020 RTP/SCS. For informational purposes further discussion of the 2020-2045 RTP/SCS is provided at the end of the 2016-2020 RTP discussion as follows:

The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy 2020-2045 RTP/SCS) was approved on September 3, 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or For longer commutes, people would have expanded regional scooters. transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing, and using an electric vehicle will be easier as a result of an expanded regional charging network.

²¹A Energy+Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020.

²¹⁸ E3, Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020, p. 22.

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs. Page 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. Transit Priority Areas (TPAs) will account for less than 1 percent of regional total land but are projected to accommodate 30 percent of future household growth between 2016 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's TPAs. TPAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals. Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The reductions generated by fuel economy improvements are already included as part of the State's GHG emissions reduction program and are not double-counted in the SB 375 target calculation. As the goals and policies from the 2020-2045 RTP/SCS are similar to the goals and policies of the 2016-2020 RTP/SCS, this GHG section and the balance of this Draft EIR provided detailed analysis of Project consistency with the 2016–2020 RTP/SCS.

The 2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.

Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15 minute or less service frequency during peak commute hours.

^{72C} SCAG, Final 2020–2045 RTP/SCS, Making Connections, May 7, 2020, p. 51.

^{72D} SCAG, Final 2020–2045 RTP/SCS, Making Connections, May 7, 2020, p. 5.

^{72E} CARB, Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, June 2017, p. B-32.

^{72F} CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets, Staff Report, p. 28

Volume 1, Section IV.E, Greenhouse Gas Emissions, subsection 3.e.(1)(a)(ii), page IV.E-57, revise the first paragraph as follows:

As discussed above, compliance with SB 375 requires a reduction in per capita transportation emissions by 19 percent by 2035 with respect to meeting the State's GHG emission reduction goals. 104 To analyze the Project's consistency with this aspect of the 2016-2040 RTP/SCS, the Project's service population VMT per capita estimates, provided in Table IV.E-6 on page IV.E-58, were compared to the applicable APC average trip length designated for the Project area. As shown in Table IV.E-6, the Project under the Mixed Use Development Scenario results in a 55 38-percent reduction for combined residents and employees in daily per capita VMT when compared to the APC designated for the Project area. The No-Hotel Development Scenario results in a 52 37-percent reduction. This reduction in VMT per capita is consistent with the reduction in VMT per capita to meet the State's GHG emission reduction goals and is attributable to the Project characteristics of being a mixed-use infill development near transit that supports multi-modal transportation options. As shown in Appendix Q.1 of this Draft EIR, implementation of Mitigation Measure TR-MM-1 and the Project design includes characteristics that would reduce trips and VMT as compared to a standard project within the air basin as measured by the air quality model (CalEEMod). These relative reductions in vehicle trips and VMT from a standard project within the air basin help quantify the GHG emissions reductions achieved by locating the Project in an infill, HQTA area that promotes alternative modes of transportation.

Volume 1, Section IV.E, Greenhouse Gas Emissions, subsection 3.e.(1)(a)(ii), page IV.E-58, replace Table IV.E-6 with <u>Revised</u> Table IV.E-6 on page III-11:

Revised Table IV.E-6 Comparison of Project's Service Population -VMT per Capita to 2016–2040 RTP/SCS

Scenario	Residents	Employees	Combined Service Population	
Mixed Use Development Scenario				
Service Population VMT 7,005 daily VMT (Project) ^a		3,825 daily VMT	10,830 daily VMT	
Service Population	1,728	582	2,310	
Daily VMT/Capita	4.1 VMT/res	6.6 VMT/emp	4.7 VMT/cap	
APC Average Designated for Project Area	8.5 <u>7.1</u> VMT/res (daily)	14.9 <u>8.9</u> VMT/emp (daily)	10.1 7.5 VMT/cap (daily)	
Percent Reduction	(52 43%)	(56 <u>26</u> %)	(54 <u>38</u> %)	
No-Hotel Development Scenario				
Service Population VMT (Project) ^a	7,936 daily VMT	3,334 daily VMT	11,270 daily VMT	
Service Population	1,931	492	2,423	
Daily VMT/Capita	4.1 VMT/res	6.8 VMT/emp	4.7 VMT/cap	
APC Average Designated for Project Area Percent Reduction (5142%)		14.9 <u>8.9</u> VMT/emp (daily)	9.8 <u>7.4</u> VMT/cap (daily)	
		(55 <u>24</u> %)	(52 <u>37</u> %)	

cap = capital

emp = employee

res = resident

Source: Eyestone Environmental, 2020.

Volume 1, Section IV.E, Greenhouse Gas Emissions, subsection 3.e.(1)(b), page IV.E-63, revise row 10 of Table IV.E-7 as follows:

^a VMT was calculated using the LADOT VMT Calculator. VMT presented in this table includes reductions from implementation of <u>Project Design Features Mitigation Measure TR-MM-1</u>. Additional Details are provided in Section IV.L. Transportation. Please refer to Appendix Q.1 of this Draft EIR.

Focus Area: Mobility and Public Transit

Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050 The City would update the Transportation Demand Management (TDM) ordinance and develop first/last mile infrastructure improvements around transit stations. TDM strategies would also be implemented consistent with the West Side Mobility Plan to east congestion.

No Conflict. While this action primarily applies to the City, the Project would be located near mass transit stations to reduce vehicle trips. The Project would also promote a pedestrian-friendly community by placing residential uses within walking distance to other retail and entertainment uses. The Project Site is located in a HQTA as designated by the 2016–2040 RTP/SCS. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors.

As discussed above, the Project would result in a 55 38-percent and 52 37-percent reduction in service population VMT per capita under the Mixed Use Development Scenario and No-Hotel Development Scenario, respectively which is consistent with the RTP/SCS reduction goals.

Volume 1, Section IV.E, Greenhouse Gas Emissions, subsection 3.e.(1)(b)(iv), page IV.E-72, revise the second paragraph as follows:

The Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options. As discussed above, the Project would result in a 55 38-percent and 52 37-percent reduction in service population VMT per capita under the Mixed Use Development Scenario and No-Hotel Development Scenario, respectively which would support the reduction in transportation emissions per capita provided in the 2016–2040 RTP/SCS. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG emissions reductions consistent with state climate targets beyond 2020.

Volume 1, Section IV.E, Greenhouse Gas Emissions, subsection 3.e.(1)(b), page IV.E-73, add subsection (v), Carbon Neutrality, as follows:

(v) Carbon Neutrality

As discussed above, Executive Order B-55-18 establishes a new statewide goal to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. Based on this executive

order, CARB would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

Also discussed above, CARB has released a study evaluating three scenarios three scenarios that achieve Carbon Neutrality in California by 2045. The scenarios analyzed to achieve carbon neutrality include a High Carbon Dioxide Removal (CDR) scenario, Zero Carbon Energy scenario, and a Balanced scenario. Under each of these scenarios, CARB proposed reduction strategies for various sectors that contribute GHG emissions throughout the State. Table IV.E-10 on page III-14 provides a summary of key emission reduction strategies required to achieve Carbon Neutrality by 2045. In addition, Table IV.E-7 demonstrates how the Project would be consistent or not conflict with these measures.

Although specific details are not yet available for the GHG reduction measures for the three scenarios discussed above, implementation of these measures would require regulations to be enforced by the State. The Project would be required to comply with regulations in support of the goal of Carbon Neutrality by 2045 and would therefore support, and be consistent with, the State's achievement of the goals included in Executive Order B-55-18.

<u>Table IV.E-10</u> <u>Project Consistency with 2045 Carbon Neutrality Goals</u>

<u>Sector</u>	<u>Description</u>	Consistency Analysis
Sector: Low Carbon Fuels	The State would use advanced biofuels for ground transportation, renewable aviation fuel and biomethane for electricity generation. Hydrogen may also be blended into pipeline gas demand as well as hydrogen for fuel cell transportation.	No Conflict. This action primarily applies to the transportation fuel providers. The Project would source transportation fuel from these providers which would comply with these reduction measures.
Sector: Buildings	The State would require 100 percent of sales of electric appliances by 2030 through 2040.	No Conflict. While the Project may include natural gas appliances, purchases of appliances after 2030 would be consistent with State requirements.
Sector: Transportation	The State would require 100 percent Battery Electric Vehicle (BEV) sales for Light Duty Vehicles (LDV) and Medium Duty Vehicles (MDV) as early as 2030. Sales of Heavy Duty Vehicles (HDV) would achieve at least 45 percent BEV or CNG as early as 2035.	
	At least 50 percent of rail within the State would be electrified and 50 percent of in-state aviation be electrified.	
Sector: Industry and Agriculture	The State would require industry to be up to 53 percent electrified and up to 19 percent of energy to be met with hydrogen. Cement, glass, oil and gas industries would be required to achieve carbon capture of at least 14 MMT. Agricultural energy emissions would be reduced by at least 80 percent.	not include industrial or agricultural
	Oil and gas extraction and petroleum refining energy demand would be reduced by at least 90 percent	
Sector: Electricity	Electricity generation within the state is fueled with natural gas, biomethane or hydrogen. At least 95 percent of electricity generation would be zero carbon.	No Conflict. This action primarily applies to the local power utility company (LADWP). The Project would source electricity from the LADWP which would comply with these reduction measures.
High GWP and Non-Combustion	Emissions reductions relative to 2020: Landfill and waste water methane would be reduced by 23 percent. Pipeline fugitive emissions would be reduced by 72 percent, agricultural methane would be reduced by 41 percent and refrigerants would be reduced by 75 percent.	No Conflict. This action primarily applies to the local water utility (LADWP) and solid waste utility relative to 2020. The Project would source water from the LADWP and generate solid waste within the City of LA which would comply with these reduction measures.

<u>Table IV.E-10 (Continued)</u> **Project Consistency with 2045 Carbon Neutrality Goals**

<u>Sector</u>	<u>Description</u>	Consistency Analysis			
Sector: Carbon Dioxide Removal	At least 33 million metric tons/year of carbon dioxide removal needed in 2045.	Not Applicable. While this action primarily applies to the State, the Project would support this policy since the Project would provide electric vehicle charging stations and electric vehicle supply wiring consistent with City requirements.			
Source: CARB, Achieving Carbon Neutrality in California, October 2020; Eyestone Environmental, 2021					

¹¹³A Energy+Environmental Economics (E3), Achieving Carbon Neutrality in California.

PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020.

¹¹³B E3, Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020, page 22.

IV.F. Hazards and Hazardous Materials

Volume 1, Section IV.F, Hazards and Hazardous Materials, subsection 1, Introduction, page IV.F-1, revise the Introduction as follows:

This section of the Draft EIR provides an analysis of the Project's potential impacts with regard to hazards and hazardous materials. The analysis is based in part on the *Phase I Environmental Site Assessment (Phase I ESA)* prepared by *Geosyntec Consultants*, dated March 2018, which is included as Appendix H.1 of this Draft EIR; the Phase I Supplemental Information Letter, dated December 2018, which is included as Appendix H.2 of this Draft EIR; the *Oil Well Report*, prepared by Geosyntec Consultants, dated March 2, 2018, and updated in February 2021 (the Oil Wells Investigation Report) and included as Appendix H.3; the *Methane Report*, prepared by Geosyntec Consultants, dated February 2018 and updated in February 2021 and included in Appendix H.4 of this Draft EIR; and the letter from California Geologic Energy Management Division—Southern District (CalGEM) dated December 11, 2020, and included in Appendix H.3 of this Draft EIR.

Volume 1, Section IV.F, Hazards and Hazardous Materials, subsection 2.b.(9)(a), page IV.F-28, revise the first full paragraph after the block quote as follows:

As shown on Figure 3 of the Updated Oil Well Location Investigation Report, the proposed buildings are located in a manner that, based on CalGEM's maps, would not directly place any new buildings over the potential six on-site oil wells shown on the CalGEM maps. Further, as proposed, the buildings would not -significantly impede future access to the locations of the existing wells—as depicted in CalGEM's maps. Finally, as shown in Figure IV.F-1 on page IV.F-25, the proposed site development plan also includes sufficient setback to accommodate appropriate sized drill rig access allowing for future abandonment/re-abandonment, in the unlikely scenario that re-abandonment is necessary.

Volume 1, Section IV.F, Hazards and Hazardous Materials, subsection 3.c., Project Design Features, page IV.F-31, revise Project Design Feature HAZ-PDF-1 as follows:

Project Design Feature HAZ-PDF-1: Project buildings would be designed and placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps.

Volume 1, Section IV.F, Hazards and Hazardous Materials, subsection 3.d.(1)(a)(i), page IV.F-35, revise the first full paragraph as follows:

As shown on Figure 3 to the Updated Oil Wells Investigation Report, the proposed structures (i.e., buildings) are located in a manner that, based on CalGEM's maps, would not place buildings over oil wells. Also, the proposed site development plan, as shown on Figure IV.F-1 on page IV.F-25, does not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps consistent with HAZ-PDF-1. Additionally, as shown in Figure IV.F-1, the proposed site development plan also includes sufficient setback to accommodate appropriate sized drill rig access allowing for future abandonment/re-abandonment in the unlikely scenario that re-abandonment is necessary. As such, less than significant impacts are anticipated with respect to the proposed Project site plan and future access to abandoned oil wells within the Project vicinity.

Volume 1, Section IV.F, Hazards and Hazardous Materials, subsection 3.d.(1)(a)(vi), page IV.F-39, revise the first paragraph as follows:

In addition, as noted above, as shown on Figure 3 to the Updated Oil Wells Investigation Report, the proposed structures (i.e., buildings) are located in a manner that, based on CalGEM's maps, would not place buildings over oil wells. Also, the proposed site development plan, as shown on Figure IV.F-1 on page IV.F-25, does not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps-consistent with HAZ-PDF-1. Additionally, as shown in Figure IV.F-1, the proposed site development plan also includes sufficient setback to accommodate appropriate sized drill rig access allowing for future abandonment/reabandonment, in the unlikely scenario that re-abandonment is necessary. As such, less than significant impacts are anticipated with respect to the proposed Project site plan and future access to abandoned oil wells within the Project vicinity.

Volume 1, Section IV.F, Hazards and Hazardous Materials, subsection 3.d.(2), Mitigation Measures, page IV.F-43, revise Mitigation Measure HAZ-MM-3 as follows:

Mitigation Measure HAZ-MM-3: A soil and site management plan will be developed and Draft Soil and Site Management Plan, included in Appendix V of the Final EIR, will be implemented to ensure all on-site contaminated soil is properly disposed of at an appropriate, permitted disposal or treatment facility and to address the potential

identification and abandonment of oil wells if encountered during earthwork activities.

- The soil management plan Draft Soil and Site Management Plan shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities.
- As part of the soil management plan Draft Soil and Site Management Plan, a licensed Petroleum Engineer, and/or his/her designee, in his or her reasonable discretion, shall be present on the Project Site during grading and excavation activities in the suspected locations of the wells and shall be on call at other times to monitor compliance with the soil and site management plan Draft Soil and Site Management Plan.

IV.G. Hydrology and Water Quality

Volume 1, Section IV.F, Hydrology and Water Quality, subsection 3.d.(1)(b)(i), page IV.G-25, revise the first partial paragraph as follows:

Rule 1166.¹⁷ Additionally, as discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, pursuant to Project Design Feature HAZ-PDF-1, Project buildings would be <u>designed and placed</u> in a manner so as to not –significantly impede future access to the locations of the existing wells—as depicted in CalGEM's maps. Therefore, compliance with existing regulations and implementation of mitigation measures would ensure the Project would not create a significant hazard to groundwater quality associated with the existing on-site oil wells.

IV.H. Land Use and Planning

Volume 1, Section IV.H, Land Use and Planning, subsection 2.a.(2)(a), revise partial paragraph on page IV.H-14 as follows:

EIR for the No-Hotel Development Scenario, along with a discussion of whether the Project conflicts or does not conflict with that particular goal. A detailed list of the goals of the 2020–2045 RTP/SCS applicable to the Project Site and a discussion of whether the Project conflicts or does not conflict with a particular goal is included, for informational purposes only, in Table 5 of Appendix J.1 of the Draft EIR for the Mixed Use Development Scenario and

in Table 5 of Appendix J.2 of the Draft EIR for the No-Hotel Development Scenario.

IV.I. Noise

Volume 1, Section IV.I, Noise, subsection 3.c., Project Design Features, page IV.I-24, revise Project Design Feature NOI-6 as follows:

Project Design Feature NOI-PDF-6: The occupancy for the Elysian Parking outdoor roof deck will be limited to 150 people.

The occupancy limitation shall be indicated on a sign that is readily visible within the outdoor roof deck.

IV.J. Population, Housing, and Employment

No corrections or additions have been made to this section of the Draft EIR.

IV.K.1 Public Services—Fire Protection

No corrections or additions have been made to this section of the Draft EIR.

IV.K.2 Public Services—Police Protection

No corrections or additions have been made to this section of the Draft EIR.

IV.K.3 Public Services—Schools

No corrections or additions have been made to this section of the Draft EIR.

IV.K.4 Public Services—Parks and Recreation

No corrections or additions have been made to this section of the Draft EIR.

IV.K.5 Public Services—Libraries

No corrections or additions have been made to this section of the Draft EIR.

IV.L. Transportation

Volume 2, Section IV.L, Transportation, subsection 1, Introduction, page IV.L-1, revise the Introduction as follows:

This section of the Draft EIR analyzes the Project's potential transportation/traffic impacts. This section is based on the *CEQA Thresholds Analysis For The 1111 Sunset Boulevard Mixed Use Project* (Transportation Analysis) prepared by Gibson Transportation Consulting, Inc., dated October 2020 and included in Appendix Q.1 of this Draft EIR. The Transportation Analysis follows the Los Angeles Department of Transportation's (LADOT) July 2020 *Transportation Assessment Guidelines* (TAG), which are described in more detail below. The Transportation Analysis was approved by LADOT on November 2, 2020. A copy of LADOT's Assessment Letter is included as Appendix Q.2 of this Draft EIR. A supplemental Transportation Assessment Memo, prepared by Iteris, Inc., dated June 2021 and VMT Table 4.9-1, prepared by Gibson Transportation Consulting, Inc., are included as Appendix X.1 and X.2, of the Draft EIR (and Appendix FEIR-5.1 and FEIR-5.2 of the Final EIR).

Volume 2, Section IV.L, Transportation, subsection 3.b.(3)(a), page IV.L-19, revise the last paragraph as follows:

Residents contribute to household VMT while employees (including retail and restaurant employees) contribute to work VMT. The TAG identifies a daily household VMT per capita impact threshold of 7.2-6.0 and a daily work VMT per employee impact threshold of 12.7-7.6 for the East Los Angeles APC (East LA APC) area, Central Area Planning Commission (APC), in which the Project is located. Therefore, should the Project's average household VMT per capita be equal to or lower than 7.2-6.0 and average work VMT per employee be equal to or lower than 12.7, 7.6, the Project's overall VMT impact would be less than significant.

Volume 2, Section IV.L, Transportation, subsection 3.c., Project Design Features, beginning on page IV.L-24, starting with the third paragraph, revise as follows:

The Project <u>would</u> also include the project design features set forth below related to construction—and operation. The operational project design features set forth in Project Design Feature TR-PDF-2 below are not included in the VMT impact analysis calculations presented herein as they are not required to reduce significant transportation impacts of the Project. However, a supplemental VMT analysis that includes the effects of the additional TDM measures in Project Design Feature PDF-2 is included in Appendix Q.1 of this Draft EIR.

Project Design Feature TR-PDF-1: A detailed Construction Management Plan, including street closure information, a detour plan,

haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Scheduling workdays to begin and end prior to the morning and afternoon peak hours, respectively, to the extent feasible so as to avoid worker trips during those peak hours.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible, to reduce the effect on traffic flow on surrounding streets.
- Planning and scheduling of construction activities so as to minimize the duration of sidewalk and lane closures on Sunset Boulevard.
- Provision of worker parking on-site or in designated off-site private parking areas and prohibition of construction-related vehicle parking on surrounding public streets, other than the streets adjacent to the Project Site.
- Provision of replacement parking for neighboring residents to make up for on-street parking temporarily lost during Project construction.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men) and to maintain access for land uses in the vicinity of the Project Site.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe routes to schools.
- Identification of a construction manager and provision of a telephone number and email address for any inquiries or complaints from community members

- regarding construction activities. The telephone number and email address shall be posted at the Project Site in a location that is readily visible to any interested party throughout the construction process.
- The construction manager shall provide advance notification to Castelar Elementary School and Nightingale Middle School of upcoming construction activities.
- Pedestrian/bicycle connections to the bus stops shall remain unblocked. If a bus stop is temporarily relocated during construction, advance notification of alternative bus stop sites and temporary location of the relocated stop shall be provided.
- **Project Design Feature TR-PDF-2:** The Project shall include the following TDM measures to further reduce VMT:
 - Unbundled Parking/Parking Cash-Out: The Project would provide unbundling parking, which requires residents and tenants to specifically opt-in to a parking lease (unbundled parking) and requires companies to refund the cost of parking to employees who opt-out (parking cash-out).
 - Promotions and Marketing: The Project shall include a transportation management coordinator (TMC) on the building management staff to promote the benefits of TDM. The TMC will provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, rideshare/carpool/ vanpool programs, and parking incentives.
 - <u>Ride-Share Program</u>: The <u>Project shall participate in the Downtown Transportation Management Organization (TMO)</u>, which would help to match employees with similar commutes into ride-share programs.
 - <u>First-Mile/Last-Mile Options:</u> The Transportation Center at the Project Site shall support services that address first-mile/last-mile connectivity issues with public transit.
 - <u>Pedestrian Network Improvements:</u> The Project shall widen sidewalks on all sides of the Project Site to meet Mobility Plan standards. The Project shall install a new pedestrian crosswalk with continental crosswalk markings across Sunset Boulevard at

White Knoll Drive with the installation of a traffic signal at that location. The Project shall also install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue.

Volume 2, Section IV.L, Transportation, subsection 3.d.(1), beginning with the last paragraph on page IV.L-38, revise as follows:

Additionally, the analysis included the Project's proposed TDM measures related to reduced parking and provision of bicycle parking. Because the Project would not result in significant impacts after incorporation of the project design features, no mitigation measures are required. However, as discussed above, the Project would implement an additional operational project design feature that includes TDM measures, such as unbundled parking/parking cash-out, promotions and marketing of the TDM program, a ride share program, first-mile/last-mile options, and pedestrian network improvements. These additional TDM measures were conservatively excluded from the VMT analysis but are included as part of the Project to minimize VMT.

As shown in Table IV.L-3 on page IV.L-40, the Mixed Use Development Scenario is estimated to generate 56,710 total daily VMT prior to incorporation of additional TDM measures. It would produce 8,309 homebased production VMT (used to calculate household VMT per capita) and 4,886 home-based work attraction VMT (used to calculate work VMT per Based on the estimate of 1,728 residents, the Mixed Use Development Scenario would generate average household VMT per capita of 4.8, which is less than the East LA-Central APC impact threshold of 7.2-6.0 and, therefore, would not result in a significant VMT impact. Based on the estimate of 582 employees, the Mixed Use Development Scenario would generate average work VMT per employee of 8.4, which is less greater than the East LA-Central APC impact threshold of 12.7-7.6 and, therefore, would also not result in a significant VMT impact without implementation of mitigation. As previously noted, the additional TDM measures would further reduce VMT per capita and VMT per employee. While the effects of those measures are conservatively excluded from this analysis, Appendix A of the Transportation Analysis provides a supplemental analysis of Project VMT including the effects of the additional TDM measures.

As shown in Table IV.L-3, the No-Hotel Development Scenario is estimated to generate 53,035 total daily VMT prior to incorporation of

additional TDM measures. It would produce 9,413 home-based production VMT (used to calculate household VMT per capita) and 4,095 home-based work attraction VMT (used to calculate work VMT per employee). Based on the estimate of 1,931 residents, the No-Hotel Development Scenario would generate average household VMT per capita of 4.9, which is less than the East LA Central APC impact threshold of 7.2-6.0 and, therefore, would not result in a significant VMT impact. Based on the estimate of 492 employees. the No-Hotel Development Scenario would generate average work VMT per employee of 8.3, which is less greater than the East LA Central APC impact threshold of 12.7-7.6 and, therefore, would also not result in a significant VMT impact without implementation of mitigation. As previously noted, the additional TDM measures would further reduce VMT per capita and VMT per employee. While the effects of those measures are conservatively excluded from this analysis, Appendix A of the Transportation Analysis provides a supplemental analysis of Project VMT including the effects of the additional TDM measures.

Based on the above, the Project would not result in significant impacts associated with VMT.

As the Project (under both development scenarios) would result in significant Work VMT impacts, the Project (under both development scenarios) would implement the mitigation measure discussed below.

Volume 2, Section IV.L, Transportation, subsection 3.d.(1), page IV.L-40, replace Table IV.L-3 with Revised Table IV.L-3 on page III-25:

Revised Table IV.L-3 VMT Analysis Summary

Land Use Information	Mixed Use Development Scenario	No-Hotel Development Scenario		
Multi-Family Housing	661 du	751 du		
Affordable Family Housing	76 du	76 du		
Hotel	180 rm			
General Office	48,000 sf	48,000 sf		
General Retail ^a	18,200 sf	18,200 sf		
High-Turnover Sit-Down Restaurant ^a	35,000 sf	35,000 sf		
Health Club	14,500 sf	14,500 sf		
Grocery Store	27,300 sf	27,300 sf		
VMT Analysis ^b				
Resident Population	1,728	1,931		
Employee Population	582	492		
Project Area Planning Commission	East Los Angeles Central	East Los Angeles Central		
Project Travel Behavior Zone	Compact Infill (Zone 3)	Compact Infill (Zone 3)		
Total Daily VMT ^c	56,710	53,035		
Home-Based Production VMT ^d	8,309	9,413		
Home-Based Work Attraction VMT ^d	4,886	4,095		
Household VMT per Capita	4.8	4.9		
Impact Threshold	7.2 6.0	7.2 6.0		
Significant Impact	No	No		
Work VMT per Employee	8.4	8.3		
Impact Threshold	12.7 7.6	12.7 7.6		
Significant Impact	No Yes	No Yes		

du = dwelling units

rm = rooms

sf = square feet

- a Includes 10,000 square feet of [retail/restaurant] space from within the hotel.
- b Project Analysis is from VMT Calculator output reports provided in Appendix A.
- See Appendix A, Report 1 of the Transportation Analysis. See Appendix X.2, Table 4.9-1 of the Draft EIR (and Appendix FEIR-5.2 of the Final EIR).
- ^d See Appendix A, Report 4 of the Transportation Analysis. See Appendix X.2, Table 4.9-1 of the Draft EIR (and Appendix FEIR-5.2 of the Final EIR).

Source: Gibson Transportation Consulting, Inc., 20202021.

Volume 2, Section IV.L, Transportation, subsection 3.d.(2), Mitigation Measures, beginning on page IV.L-40, revise subsection (2), Mitigation Measures, as follows:

(2) Mitigation Measures

No Project-level impacts related to VMT would occur. Therefore, no mitigation measures are required.

Consistent with the VMT calculator, the following mitigation measure is proposed to address Work VMT impacts:

<u>Mitigation Measure TR-MM-1:</u> The Project shall include the following TDM measures to further reduce VMT:

- Unbundled Parking/Parking Cash-Out: The Project would provide unbundled parking, which requires residents and tenants to specifically opt-in to a parking lease (unbundled parking) and requires companies to refund the cost of parking to employees who opt-out (parking cash-out).
- Promotions and Marketing: The Project shall include a transportation management coordinator (TMC) on the building management staff to promote the benefits of TDM. The TMC will provide information on public transit and any related incentives, flexible work schedules and telecommuting programs, pedestrian and bicycle amenities provided, rideshare/carpool/ vanpool programs, and parking incentives.
- Ride-Share Program: The Project shall participate in the Downtown Transportation Management Organization (TMO), which would help to match employees with similar commutes into ride-share programs.
- <u>First-Mile/Last-Mile Options: The Transportation Center at the Project Site shall support services that address first-mile/last-mile connectivity issues with public transit.</u>
- Pedestrian Network Improvements: The Project shall widen sidewalks on all sides of the Project Site to meet Mobility Plan standards. The Project shall install a new pedestrian crosswalk with continental crosswalk markings across Sunset Boulevard at White Knoll Drive with the installation of a traffic signal at that location. The Project shall also install all-way stop-control at the intersection of Beaudry Avenue & Alpine Street, where there is currently an uncontrolled crosswalk across Beaudry Avenue.

Volume 2, Section IV.L, Transportation, subsection 3.d.(2), beginning on page IV.L-41, revise subsection (2), Level of Significance after Mitigation, as follows:

(3) Level of Significance after Mitigation

No Project-level impacts related to VMT would occur. Therefore, no mitigation measures were required or included, and the impact level would remain less than significant.

As shown in Table IV.L-4 on page III-28, under the Mixed Use Development Scenario with mitigation, the household VMT per resident would be 4.1 (below the Central APC significance threshold of 6.0) and the work VMT per employee would be 6.6 (below the Central APC significance threshold of 7.6). Under the No-Hotel Development Scenario with mitigation, the household VMT per resident would be 4.1 and the work VMT per employee would be 6.8, also under the Central APC significance thresholds. Therefore, with implementation of Mitigation Measure TR-MM-1, the Project would not result in significant impacts associated with VMT.

Table IV.L-4
VMT Analysis Summary After Mitigation

Land Use Information	<u>Mixed Use</u> <u>Development Scenario</u>	<u>No-Hotel</u> <u>Development Scenario</u>		
Multi-Family Housing	<u>661 du</u>	<u>751 du</u>		
Affordable Family Housing	<u>76 du</u>	<u>76 du</u>		
<u>Hotel</u>	<u>180 rm</u>			
General Office	48,000 sf	48,000 sf		
General Retaila	<u>18,200 sf</u>	18,200 sf		
High-Turnover Sit-Down Restauranta	<u>35,000 sf</u>	35,000 sf		
Health Club	<u>14,500 sf</u>	<u>14,500 sf</u>		
Grocery Store	<u>27,300 sf</u>	<u>27,300 sf</u>		
VMT Analysis ^b				
Resident Population	<u>1,728</u>	1,931		
Employee Population	<u>582</u>	492		
Project Area Planning Commission	<u>Central</u>	<u>Central</u>		
Project Travel Behavior Zone	Compact Infill (Zone 3)	Compact Infill (Zone 3)		
Total Daily VMT ^c	<u>52,517</u>	<u>49,137</u>		
Home-Based Production VMT ^d	<u>7,005</u>	<u>7,936</u>		
Home-Based Work Attraction VMT ^d	<u>3,825</u>	<u>3,334</u>		
Household VMT per Capita	4.1	4.1		
Impact Threshold	<u>6.0</u>	<u>6.0</u>		
Significant Impact	<u>No</u>	<u>No</u>		
Work VMT per Employee	6.6	6.8		
Impact Threshold	<u>7.6</u>	7.6		
Significant Impact	<u>No</u>	<u>No</u>		

du = dwelling units

rm = rooms

sf = square feet

- a Includes 10,000 square feet of [retail/restaurant] space from within the hotel.
- b Project Analysis is from VMT Calculator output reports provided in Appendix A.
- See Appendix X.2, Table 4.9-1 of the Draft EIR (and Appendix FEIR-5.2 of the Final EIR).
- d See Appendix X.2, Table 4.9-1 of the Draft EIR (and Appendix FEIR-5.2 of the Final EIR).

Source: Gibson Transportation Consulting, Inc., 2021.

IV.M. Tribal Cultural Resources

Volume 2, Section IV.M, Tribal Cultural Resources, subsection 3.d.(2), on page IV.M-18, revise bullet 1 of Mitigation Measure TCR-MM-1 as follows:

- Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project;⁸ and (2) OHR.
- It should be noted that in the event that any human remains affiliated with the Gabrielino Indians are encountered during Project construction, Mr. Robert Dorame (chair of the Gabrielino Tongva Indians of California Tribal Council) or current chair would be notified. Additionally, the chair would be notified if any cultural remains, deposits, or artifacts pertaining to the Gabrielino or Tongva were to be found during construction even if a Most Likely Descendant has been designated from another tribe.

Volume 2, Section IV.M, Tribal Cultural Resources, subsection 3.d.(2), on page IV.M-18, revise bullet 3 of Mitigation Measure TCR-MM-1 as follows:

3. The Applicant, or its successor, shall implement the tribe's recommendations of if the qualified archaeologist retained by the City and paid for by the Applicant, in consultation with the tribal monitor, reasonably concludes that the tribe's recommendations are reasonable and feasible.

IV.N.1 Utilities and Service Systems—Water Supply and Infrastructure

No corrections or additions have been made to this section of the Draft EIR.

IV.N.2 Utilities and Service Systems—Wastewater

No corrections or additions have been made to this section of the Draft EIR.

IV.N.3 Utilities and Service Systems—Energy Infrastructure

No corrections or additions have been made to this section of the Draft EIR.

V. Alternatives

Volume 2, Section V, Alternatives, page V-14, revise the second row of Section L, Transportation, of Table V-2 as follows:

Vehicle Miles Traveled	Less Than Significant with Mitigation	Less (No Impact)	Greater (Less Than Significant Impact with	Less (Less Than Significant Impact)	Similar Less (Less Than Significant Impact)	Greater (Less Than Significant Impact with	Greater (Less Than Significant Impact with
	<u>ivitigation</u>		Mitigation)	mpaoty	impaoti	Mitigation)	Mitigation)

Volume 2, Section V, Alternatives, page V-27, revise Subsection I, Transportation, as follows:

Since the No Project Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to operational traffic, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous design features; emergency access; and freeway safety. However, this alternative would not provide the same community-serving assets as the Project, including wider sidewalks around the Project Site, and the Transportation Center which support many City policies. Overall, impacts under Alternative 1 would be less when compared to the Project, which would be less than significant.

Volume 2, Section V, Alternatives, page V-43, revise the second full paragraph as follows:

Additionally, similar to the Project, Alternative 2 would follow applicable California Geologic Energy Management Division (CalGEM) requirements for site plan review for construction activities proposed in the area of existing This alternative would also include implementation of the same mitigation measures as the Project (under both development scenarios) to ensure potential impacts associated with the discovery of buried wells is less than significant. As with the Project, Mitigation Measures HAZ-MM-1 and HAZ-MM-2, may require an additional surface geophysical survey be conducted to attempt to locate the oil wells on the Project Site following demolition of existing structures (as the prior survey did not locate any existing oil wells and existing structures precluded geophysical survey in some areas of the site). If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, the Los Angeles City Certified Unified Program Agency (LACUPA), and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented pursuant to

Mitigation Measure HAZ-MM-3 to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.⁶ Additionally, as with the Project, Alternative 2 would implement Project Design Feature HAZ-PDF-1, which would require buildings be placed in a manner so as to not significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps.

Volume 2, Section V, Alternatives, page V-47, revise the first paragraph as follows:

As with the Project, construction activities associated with the Zoning Compliant Alternative could also encounter contaminated soil groundwater that would require proper handling and disposal. construction is proposed in the area of existing wells, applicable CalGEM requirements for site plan review would be followed. In addition, as with the Project, Alternative 2 would implement the same mitigation measures to ensure potential impacts associated with the discovery of buried oil wells is less than significant. If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.7 Additionally, as with the Project, Alternative 2 would implement the same Project Design Feature (HAZ-PDF-1), which would require buildings be designed and placed in a manner so as to not significantly impede future access to the locations of the existing wells-as depicted in CalGEM's maps. Therefore, compliance with existing regulations would ensure the Zoning Compliant Alternative would not create a significant hazard to groundwater quality associated with the existing on-site oil wells.

Volume 2, Section V, Alternatives, page V-63, revise the first full paragraph as follows:

When accounting for the same project design features as the Project, With respect to VMT, the proposed uses under Alternative 2 would result in a lower daily VMT when compared to both development scenarios. Specifically, as shown in Appendix T of this Draft EIR, Alternative 2 would result in a 41,996 total daily VMT, which would be comparatively less than the 56,710 daily VMT generated by the Mixed Use Development Scenario and the 53,035 daily VMT generated by the No-Hotel Development Scenario. Based on the population assumptions, this Alternative would generate an average household VMT of 5.1 per capita and an average work VMT of 8.4 per employee. 19 As such, the average household VMT per capita for Alternative 2 would still-fall below the significance threshold of 7.2-6.0 and the average work VMT per employee for Alternative 2 would still fall below be greater than the significance threshold of 12.7 7.6.20 As such, Alternative 2 would also implement the TDM strategies outlined in Mitigation Measure TR-MM-1, which would reduce the Daily Work VMT per employee. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant with mitigation and greater than the less-than-significant-with-mitigation impacts of the Project.

Volume 2, Section V, Alternatives, page V-68, Section 3, Comparison of Impacts, revise the first paragraph as follows:

As evaluated above, Alternative 2 would not eliminate any of the Project's significant and unavoidable impacts. Specifically, the Project's significant and unavoidable impacts related to regional air quality emissions during construction; on- and off-site construction noise; and vibration from onand off-site construction with respect to the significance threshold for human annoyance would remain with the Zoning Compliant Alternative. Additionally, Alternative 2 would not avoid the Project's significant and unavoidable cumulative regional air quality impacts during construction; cumulative construction noise impacts from on-site and off-site noise sources; and cumulative vibration impacts associated with off-site construction, pursuant to the significance threshold for human annoyance. In addition, since this Alternative would result in a greater average household VMT per capita and a greater average work VMT per employee than the No-Hotel Development Scenario. both development scenarios, Alternative 2 would result in a greater impact associated with VMT. The remaining impacts would be similar to or less than those of the Project.

Volume 2, Section V, Alternatives, page V-82, revise the first paragraph as follows:

Additionally, similar to the Project, Alternative 3 would follow applicable CalGEM requirements for site plan review for construction activities proposed in the area of existing wells. The Office Campus Alternative would also include implementation of the same mitigation measures as the Project (under both development scenarios) to ensure potential impacts associated with the discovery of buried wells is less than significant. As with the Project, Mitigation Measure HAZ-MM-1 and HAZ-MM-2, may require an additional surface geophysical survey be conducted to attempt to locate the oil wells on the Project Site following demolition of existing structures (as the prior survey did not locate any existing oil wells and existing structures precluded geophysical survey in some areas of the site). If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented pursuant to Mitigation Measure HAZ-MM-3 to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Additionally, as with the Project, Alternative 3 would implement Project Design Feature HAZ-PDF-1, which would require buildings be designed and placed in a manner so as to not significantly impede future access to the locations of the existing wells-as depicted in CalGEM's maps.

Volume 2, Section V, Alternatives, page V-86, revise the first partial paragraph as follows:

would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.²⁴ Additionally, as with the Project, Alternative 3 would implement the same Project Design Feature (HAZ-PDF-1), which would require buildings be <u>designed and placed</u> in a manner so as to not significantly impede future access to the locations of the existing wellsas depicted in CalGEM's maps. Therefore, compliance with existing regulations would ensure construction activities associated with the

Office Campus Alternative would not create a significant hazard to groundwater quality associated with the existing on-site oil wells.

Volume 2, Section V, Alternatives, page V-99, revise second paragraph as follows:

With respect to VMT, Alternative 3 does not include residential uses and would not result in any household VMT per capita. When accounting for the same project design features as the Project, the The proposed uses would result in 54,641 total daily VMT, which would be comparatively less than the 56,710 total daily VMT generated by the Mixed Use Development Scenario and greater than the 53,035 total daily VMT generated by the No-Hotel Development Scenario. Based on the population assumptions, this Alternative would generate an average work VMT per employee of 7.2.26 As such, the average work VMT per employee for Alternative 3 would still fall below the significance threshold of 12.7 7.6.27 Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant and less than the less-than-significant_with_mitigation impacts of the Project.

Volume 2, Section V, Alternatives, page V-118, revise the first partial paragraph as follows:

known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Additionally, as with the Project, Alternative 4 would implement Project Design Feature HAZ-PDF-1, which would require buildings be <u>designed and placed</u> in a manner so as to not significantly impede future access to the locations of the existing wells—as depicted in CalGEM's maps.

Volume 2, Section V, Alternatives, page V-121, revise the second full paragraph as follows:

Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.

²⁷ Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020 Table 4.9-9. See Appendix TX.2 of this the Draft EIR (and Appendix FEIR-5.2 of the Final EIR).

As with the Project, construction activities associated with the Retail and Residential Mixed Use Alternative could encounter contaminated soil and groundwater that would require proper handling and disposal. construction is proposed in the area of existing wells, applicable CalGEM requirements for site plan review would be followed. In addition, as with the Project, Alternative 4 would implement the same mitigation measures to ensure potential impacts associated with the discovery of buried wells is less than significant. If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.33 Additionally, as with the Project, Alternative 4 would implement the same Project Design Feature (HAZ-PDF-1), which would require buildings be designed and placed in a manner so as to not significantly impede future access to the locations of the existing wells-as depicted in CalGEM's maps. Therefore, compliance with existing regulations would ensure construction activities would not create a significant hazard to groundwater quality associated with the existing on-site oil wells.

Volume 2, Section V, Alternatives, beginning on page V-137, revise the last paragraph as follows:

With respect to VMT, when accounting for the same project design features as the Project, the proposed uses would result in a greater total daily VMT when compared to both development scenarios. Specifically, this Alternative would result in 68,821 total daily VMT, which would be comparatively greater than the 56,710 daily VMT generated by the Mixed Use Development Scenario and the 53,035 daily VMT generated by the No-Hotel Development Scenario. Based on the population assumptions, Alternative 4 would generate an average household VMT of 4.9 per capita. While the total daily VMT generated under Alternative 4 would be greater than both development scenarios (both at 4.8), As such, the average household VMT per capita for Alternative 4 would still fall below the significance threshold of 7.2 6.0.46 Therefore, similar to the Project, impacts with respect to conflicts

with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant and less than the impacts of the Project.

- Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.
- Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020 Table 4.9-9. See Appendix TX.2 of this the Draft EIR (and Appendix FEIR-5.2 of the Final EIR).

Volume 2, Section V, Alternatives, beginning on page V-156, revise the first partial paragraph as follows:

construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166. Additionally, as with the Project, Alternative 5 would implement Project Design Feature HAZ-PDF-1, which would require buildings be designed and placed in a manner so as to not -significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps.

Volume 2, Section V, Alternatives, page V-159, revise the second paragraph as follows:

As with the Project, construction activities associated with Alternative 5 could also encounter contaminated soil and groundwater that would require proper handling and disposal. Where construction is proposed in the area of existing wells, applicable CalGEM requirements for site plan review would be followed. In addition, as with the Project, Alternative 5 would implement the same mitigation measures to ensure potential impacts associated with the discovery of buried wells is less than significant. If located, the wells would be unearthed and inspected by a licensed Petroleum Engineer and would be reported to CalGEM to assess and prescribe abandonment procedures based on their observed condition, as well as the Petroleum Administrator, LACUPA, and Los Angeles Department of City Planning. Similar to the Project, a soil and site management plan would be developed and implemented to address the potential identification and abandonment of the oil wells if encountered during earthwork activities. Furthermore, in the event contaminated soils are encountered during construction, or construction occurs in areas of known or potential contamination, the nature and extent of the contamination would be determined and appropriate handling, disposal, and/or treatment would be implemented in accordance with applicable regulatory requirements, including SCAQMD Rule 1166.⁵⁰ Additionally, as with the Project, Alternative 5 would implement the same Project Design Feature (HAZ-PDF-1), which would require buildings be <u>designed and placed</u> in a manner so as to not -significantly impede future access to the locations of the existing wells as depicted in CalGEM's maps. Therefore, compliance with existing regulations would ensure construction activities would not create a significant hazard to groundwater quality associated with the existing on-site oil wells.

Volume 2, Section V, Alternatives, page V-173, revise the first full paragraph as follows:

When accounting for the same project design features as the Project, With respect to VMT, the proposed uses would result in a lower daily VMT when compared to both development scenarios. Specifically, as shown in Appendix T of this Draft EIR, Alternative 5 would result in 37,460 total daily VMT, which would be comparatively less than the 56,710 daily VMT generated by the Mixed Use Development Scenario and the 53,035 daily VMT generated by the No-Hotel Development Scenario. Based on the population assumptions, this Alternative would generate an average household VMT of 5.1 per capita and an average work VMT per employee of 8.5, which would be comparatively more than the Mixed Use Development Scenario's average household VMT of 4.8 per capita and average work VMT per employee of 8.4 and the No-Hotel Development Scenario's average household VMT of 4.9 per capita and average work VMT per employee of 8.3.53 Nevertheless, As such, the average household VMT per capita for Alternative 5 would still fall below the significance threshold of 7.2-6.0 and would be greater than the average work VMT per employee of 12.7 7.6.54 As such, Alternative 5 would also implement the TDM strategies outlined in Mitigation Measure TR-MM-1, which would reduce the Daily Work VMT per employee. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less-than-significant with mitigation and greater than the impacts of the Project.

Volume 2, Section V, Alternatives, page V-191, revise the seventh sentence of the first paragraph as follows:

Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.

Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020 Table 4.9-9. See Appendix T-X.2 of this the Draft EIR (and Appendix FEIR-5.2 of the Final EIR).

Additionally, as with the Project, Alternative 6 would implement Project Design Feature HAZ-PDF-1, which would require buildings be <u>designed and</u> placed in a manner so as to not significantly impede future access to the locations of the existing wells as <u>depicted in CalGEM's maps</u>.

Volume 2, Section V, Alternatives, page V-195, revise the first partial paragraph as follows:

including SCAQMD Rule 1166.⁵⁶ Additionally, as with the Project, Alternative 6 would implement the same Project Design Feature (HAZ-PDF-1), which would require buildings be <u>designed and placed</u> in a manner so as to not significantly impede future access to the locations of the existing wells—as depicted in CalGEM's maps.

Volume 2, Section V, Alternatives, page V-208, revise the second paragraph as follows:

When accounting for the same project design features as the Project, With respect to VMT, the proposed uses would result in a lower daily VMT when compared to both development scenarios. Specifically, as shown in Appendix T of this Draft EIR, Alternative 6 would result in 6,896 total daily VMT, which would be comparatively less than the 56,710 daily VMT generated by the Mixed Use Development Scenario and the 53,035 daily VMT generated by the No-Hotel Development Scenario. As previously discussed, this Alternative would eliminate the non-residential uses proposed by both development scenarios; therefore, this alternative would not result in any work VMT per employee. Based on the population assumptions, this Alternative would generate an average household VMT of 6.1 per capita, which would be comparatively more than the Mixed Use Development Scenario's average household VMT of 4.8 per capita and the No-Hotel Development Scenario's average household VMT of 4.9 per capita.⁵⁷ As such, Additionally, the average household VMT per capita for Alternative 6 would still fall below be greater than the significance threshold of 7.2 6.0.58 As such, Alternative 6 would also implement the TDM strategies outlined in Mitigation Measure TR-MM-1, which would reduce the VMT impacts. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less- than- significant with mitigation and; however, impacts would be greater than the less-than-significant impacts of the Project.

- ⁵⁷ Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020. See Appendix T of this Draft EIR.
- Gibson Transportation Consulting, Inc., "Transportation Assessment for the Alternatives to the 1111 Sunset Boulevard Mixed Use Project," October 19, 2020 Table 4.9-9. See Appendix —X.2 of this the Draft EIR (and Appendix FEIR-5.2 of the Final EIR).

VI. Other CEQA Considerations

Volume 2, Section VI, Other CEQA Considerations, subsection 5, Potential Secondary Effects of Mitigation Measures, page VI-21, after subsection f, Noise, add the following:

g. Transportation

Both development scenarios would implement Mitigation Measure TR-MM-1, which would require the Project Applicant to implement a Transportation Demand Management (TDM) Program that would promote non-auto travel and reduce the use of single-occupant vehicle trips for residents and office employees on the Project Site. These strategies may include supporting rideshare, carpool, and vanshare programs; providing bicycle amenities; offering incentives for using alternative travel modes; and providing information on TDM-related programs on-site. Overall, this mitigation measure would improve traffic conditions in the area and reduce the Project's significant traffic impacts. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

Volume 2, Section VI, Other CEQA Considerations, subsection 5, Potential Secondary Effects of Mitigation Measures, page VI-21, revise the heading for subsection g, Tribal Cultural Resources, as follows:

g. h. Tribal Cultural Resources

Appendix C—Air Quality and Greenhouse Gas Emissions

Appendix C.2-3: CalEEMod Input Notes, page 25, Third Bullet

 Total haul trips during the excavation phase of project construction was calculated by multiplying maximum daily trips and the total number of days of excavation as referenced as "See Assumptions" in the CalEEMod Output files on pages 27, 49, and 101 of Appendix C.2-4. This was done to capture the worst-case daily emissions. However, this method would conservatively overestimate the total number of haul truck trips as under real world conditions, the maximum truck trips would not be occurring on a daily basis.

Appendix J—Land Use Tables

Appendix J.1: Land Use Tables—Mixed Use Development Scenario, page 14, revise consistency analysis for "Policy 4.8: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles" as follows:

As provided in Section IV.L, Transportation, of this Draft EIR, the Project would include implementation of a Transportation Demand Management (TDM) Program (Project Design Feature TR-PDF-2) (pursuant to Mitigation Measure TR-MM-1) that would promote non-auto travel and reduce the use of single-occupant vehicle trips for residents and office employees on the Project Site. These strategies may include supporting rideshare, carpool, and vanshare programs; providing bicycle amenities; offering incentives for using alternative travel modes; and providing information on TDM-related programs on-site. Therefore, the Project would not conflict with this policy.

Appendix J.1: Land Use Tables—Mixed Use Development Scenario, page 31, add <u>Table 5</u> on page III-41:

Table 5 Applicable Goals of SCAG's Regional Transportation Plan/Sustainable Communities Strategy (2020– 2045 RTP/SCS)

Goals

Goal 2: Improve mobility, accessibility, reliability and travel safety for people and goods.

Goal 4: Increase person and goods movement and travel choices within the transportation system.

Would the Project Conflict?

No Conflict. The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options. Specifically, Metro provides a bus stop adjacent to the Project Site at Sunset Boulevard and Beaudry Avenue for Metro Bus Line 2/302 and Metro Bus Line 4, which run east/west along Sunset Boulevard. Metro Bus Line 2/302 and Metro Bus Line 4 connect Downtown Los Angeles with Pacific Palisades and West Los Angeles, respectively. Metro Rapid 704, which also runs along Sunset Boulevard, has a stop at Sunset Boulevard and Figueroa Street and connects Downtown Los Angeles with the City of Santa Monica. The Project Site is also located one block from a Metro Bus Line 10 stop that runs east/west along Temple Street. In addition, the Project Site is near the LADOT Dash Lincoln Heights/Chinatown bus line that connects with the Chinatown Gold Line Station which has connections to Union Station and Downtown Los The availability and accessibility of public transit in the Project area is documented by the Project Site's location within a designated SCAG High-Quality Transit Area³ and City of Los Angeles Transit Priority Area, as defined in the City's Zoning Information File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. Additionally, the Project would include a Transportation Center that would support multimodal mobility options such as bicycle and scooter sharing services. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. Therefore, the Project would not conflict with these goals.

Goal 5: Reduce greenhouse gas emissions and improve air quality.

Goal 6: Support healthy and equitable communities.

The Project proposes to enhance No Conflict. pedestrian activity within and surrounding the Project Site by creating a pedestrian-oriented environment through the development of a high-density mix of uses that would serve the Project Site and the surrounding area. The Project would provide numerous dedicated entry points for pedestrians and would incorporate landscaped pedestrian walkways transecting the Project Site._ Other landscaping features would be planted

<u>Goals</u>	Would the Project Conflict?
	throughout the Project Site and along the adjacent streets, which would activate these streets and further contribute to a pedestrian-friendly environment. The introduction of ground-floor commercial uses that would be oriented toward Sunset Boulevard and Beaudry Avenue would also serve to activate the street and promote walkability. The Project Site's location within an area that is well-served by transit would further promote walking and other forms of active transportation. As part of the Project, a designated Transportation Center to be located near pedestrian access would provide multimodal mobility options such as bicycle and scooter sharing services to help improve the convenience of making trips without the use of a personal automobile. The Project would provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue and an off-street pick-up/drop-off area at the Sunset Building near the corner of Beaudry Avenue and Sunset Boulevard. The Project would provide a new signalized pedestrian crosswalk across Sunset Boulevard at White Knoll Drive, install all-way stop-control at the existing crosswalk on Beaudry Avenue at Alpine Street, and widen the sidewalks adjacent to the Project Site, thereby enhancing safety within the Project Site. Further, as provided in Section IV.L, Transportation, of this Draft EIR, the Project would include implementation of a TDM program (pursuant to Mitigation Measure TR-MM-1) that would promote non-automobile travel (i.e., active/non-motorized transportation, such as bicycling and walking). These Project characteristics would support the reduction of the environment and health of residents by improving air quality and encouraging active transportation.
	goals.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	·

 Mobility Options Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets Plan for growth near transit investments and support implementation of first/last mile strategies Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) Identify ways to "right size" parking requirements and promote alternative parking requirements and promote alternative parking or spart 		Waydatha Brainat Canfliata
Strategy: Focus Growth Near Destinations & Mo Conflict. As discussed above, the Promobility Options Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets Plan for growth near transit investments and support implementation of first/last mile strategies Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations Mo Conflict. As discussed above, the Prolocated within a Transit Priority Area and a Transit Area. Additionally, the Project Site along a transit corridor that is well-serve transit. There are bus stops and several by calling a transit. There are bus stops and several by calling a transit corridor that is well-serve transit. There are bus stops and several by calling a transit corridor that is well-serve transit. There are bus stops and several by calling a transit corridor that is well-serve transit. There are bus stops and several by calling a transit corridor that is well-serve transit. There are bus stops and several by calling a transit Area. Additionally, the Project Site along a transit corridor that is well-serve transit. There are bus stops and several by calling a transit Area. Additionally, the Project Site along a transit corridor that is well-serve transit. There are bus stops and several by calling a transit Area. Additionally, the Project Site along a transit corridor that is well-serve transit. There are bus stops and several by transit. There are bus stops and several by calling a transit area. Additionally transit and along carter-focused main streets. There are bus stops and severa	wit	would the Project Conflict?
 Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets Plan for growth near transit investments and support implementation of first/last mile strategies Promote the redevelopment other outmoded nonresidential uses Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods Encourage design and transportation options that reduce the reliance on and number of solocating and orienting close to existing destinations) Identify ways to "riight size" parking requirements and promote alternative parking extrategies (e.g., shared parking or smart 		vith this goal.
parking) Discription Development Scenario would incorporate common and private open space and amenities within the Project Site. The Project provide bicycle parking to encourage use of modes of transportation. Based on its urban location on an underutilized access to public transit and alternative form and its proposed mix of uses, the Project was promote land use patterns that facilitate access; promote a jobs/housing balance	Strategy: Focus Growth Near Destinations & Mobility Options • Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	lo Conflict. As discussed above, the Project Site is possible to cated within a Transit Priority Area and a High-Quality transit Area. Additionally, the Project Site is located long a transit corridor that is well-served by public ansit. There are bus stops and several bus lines that un adjacent to the Project Site. Specifically, Metro Bus ine 2/302 and Metro Bus Line 4, which run east/west long Sunset Boulevard, have a stop located adjacent to the Project Site at Sunset Boulevard and Beaudry when the Bus Line 2/302 and Metro Bus Line 4 connect Downtown Los Angeles with Pacific Palisades and West Los Angeles, respectively. Metro Rapid 704, which also runs along Sunset Boulevard, has a stop at sunset Boulevard and Figueroa Street. This line connects Downtown Los Angeles with the City of Santa Monica. The Project Site is also located one block from Metro Bus Line 10 stop that runs east/west along temple Street. In addition, the Project Site is near the ADOT Dash Lincoln Heights/Chinatown bus line that connects with the Chinatown Gold Line Station which as connections to Union Station and Downtown Los angeles. The Mixed Use Development Scenario would replace the existing vacant buildings and provide housing and new mployment opportunities by constructing up to 737 esidential units, up to 180 hotel rooms, up to 48,000 quare feet of office space, and up to 95,000 square feet f general commercial floor area. Additionally, the Mixed lise Development Scenario would incorporate numerous formon and private open space and recreational menities within the Project Site. The Project would also rovide bicycle parking to encourage use of alternative

options. The Project would therefore not conflict with this

land use strategy.

Goals

Strategy: Promote Diverse Housing Choices

- <u>Preserve and rehabilitate affordable housing</u> and prevent displacement
- <u>Identify funding opportunities for new workforce and affordable housing development</u>
- Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply
- Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions

Strategy: Leverage Technology Innovations

- Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space
- Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation

<u>Strategy: Support Implementation of</u> Sustainability Policies

- Pursue funding opportunities to support local <u>sustainable development implementation</u> <u>projects that reduce greenhouse gas</u> <u>emissions</u>
- Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations
- Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance

Would the Project Conflict?

No Conflict. As the Project Site is currently occupied by vacant buildings where no residential uses exist, the Project would not displace housing. As described in Goal 9 above, the Project would provide a range of unit types. Specifically, the Mixed Use Development Scenario would develop up to 737 units, consisting of one- and, two-, bedroom residential units, and would include up to 76 restricted affordable housing units.

The actions in this strategy associated with incentives to reduce regulatory barriers and streamline housing development that reduces greenhouse gases are geared to the local jurisdictions and not to development projects. Overall, the Project would provide diverse housing choices and would not conflict with this land use strategy.

No Conflict. The Project would meet the City's electric vehicle requirements to provide parking facilities capable of supporting future electric vehicle supply equipment (EVSE), as well as parking spaces equipped with electric vehicle (EV) charging stations. Pursuant to City of Los Angeles Ordinance 186,485 and Ordinance 186,488, 30 percent of all new parking spaces would be required to be EV "ready" which will be capable of supporting future EV charging equipment. Additionally, 10 percent of new parking spaces would require EV charging equipment. As discussed above, the Project would also incorporate the use of Energy Star-labeled appliances and would comply with applicable energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond requirements, such as LEED® Certified equivalency. Pursuant to Project Design Feature WAT-PDF-1, the Project would incorporate water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances. sustainability features would reduce greenhouse gas emissions. The remaining actions to promote these strategies are specific to local jurisdictions and not private development projects. Overall, the Project would technology innovations and support leverage implementation of sustainability policies, and the Project would not conflict with these land use strategies.

Page III-44

sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy Strategy: Promote a Green Region • Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote a Green Region • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote a Green Region • Progetic miplementation that improves community resiliency to climate change and natural hazards • Proporte more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity. • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space.
projects. Overall, the Project would promote more resource efficient development.

3 SCAG, GIS & Data Services, High Quality Transit Areas (HQTAs) SCAG Region, https://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c 3_0/explore?location=34.069966%2C-118.242391%2C12.85, last modified on February

- 22, 2021. accessed on August 23, 2021. The RTP/SCS defines HQTAs as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.
- SCAG, GIS & Data Services, High Quality Transit Areas (HQTAs) SCAG Region, https://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c 3_0/explore?location=34.069966%2C-118.242391%2C12.85, last modified on February 22, 2021. accessed on August 23, 2021. The RTP/SCS defines HQTAs as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.

Appendix J.2: Land Use Tables—No- Hotel Development Scenario, page 14, revise consistency analysis for "Policy 4.8: Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles" as follows:

As provided in Section IV.L, Transportation, of this Draft EIR, the Project would include implementation of a Transportation Demand Management (TDM) Program (Project Design Feature TR-PDF-2) (pursuant to Mitigation Measure TR-MM-1) that would promote non-auto travel and reduce the use of single-occupant vehicle trips for residents and office employees on the Project Site. These strategies may include supporting rideshare, carpool, and vanshare programs; providing bicycle amenities; offering incentives for using alternative travel modes; and providing information on TDM-related programs on-site. Therefore, the Project would not conflict with this policy.

Appendix J.2: Land Use Tables—No-Hotel Development Scenario, page 32, add Table 5 on page III-48:

Goals Would the Project Conflict?

Goal 2: Improve mobility, accessibility, reliability and travel safety for people and goods.

Goal 4: Increase person and goods movement and travel choices within the transportation system.

No Conflict. The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of nearby mass transit options, including a number of bus lines. Specifically, Metro provides a bus stop adjacent to the Project Site at Sunset Boulevard and Beaudry Avenue for Metro Bus Line 2/302 and Metro Bus Line 4, which run east/west along Sunset Boulevard. Metro Bus Line 2/302 and Metro Bus Line 4 connect Downtown Los Angeles with Pacific Palisades and West Los Angeles, respectively. Metro Rapid 704, which also runs along Sunset Boulevard, has a stop at Sunset Boulevard and Figueroa Street. This line connects Downtown Los Angeles with the City of Santa Monica. The Project Site is also located one block from a Metro Bus Line 10 stop that runs east/west along Temple Street. In addition, the Project Site is near the LADOT Dash Lincoln Heights/Chinatown bus line that connects with the Chinatown Gold Line Station which has connections to Union Station and Downtown Los Angeles. availability and accessibility of public transit in the Project area is documented by the Project Site's location within a designated SCAG High-Quality Transit Area3 and City of Los Angeles Transit Priority Area, as defined in the City's Zoning Information File No. 2452. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of The Project would also include adequate bicycles. parking to serve the proposed uses and would provide charging stations to serve electric vehicles. Additionally, the Project would include a Transportation Center that would provide multi-modal mobility options such as bicycle and scooter sharing services and the Project would provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue and an offstreet pick-up/drop-off area at the Sunset Building near the corner of Beaudry Avenue and Sunset Boulevard. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. Therefore, the Project would not conflict with these goals.

Goal 5: Reduce greenhouse gas emissions and improve air quality.

Goal 6: Support healthy and equitable communities.

No Conflict. The Project proposes to enhance pedestrian activity within and surrounding the Project Site by creating a pedestrian-oriented environment through the development of a high-density mix of uses that would

<u>Goals</u>	Would the Project Conflict?
Goals	serve the Project Site and the surrounding area. The Project would provide numerous dedicated entry points for pedestrians and would incorporate landscaped pedestrian walkways transecting the Project Site. Other landscaping features would be planted throughout the Project Site and along the adjacent streets, which would activate these streets and further contribute to a pedestrian-friendly environment. The introduction of ground-floor commercial uses that would be oriented toward Sunset Boulevard and Beaudry Avenue would also serve to activate the street and promote walkability. The Project Site's location within an area that is well-served by transit would further promote walking and other forms of active transportation. As part of the Project, a designated Transportation Center to be located near pedestrian access, would provide multi-modal mobility options such as bicycle and scooter sharing services to help improve the convenience of making trips without the use of a personal automobile. The Project would provide dedicated curb-side passenger loading areas on Alpine Street and Beaudry Avenue and an off-street pick-up/drop-off area at the Sunset Building near the corner of Beaudry Avenue and Sunset Boulevard. The Project would provide a new signalized pedestrian crosswalk across Sunset Boulevard at White Knoll Drive, install all-way stop-control at the existing crosswalk on Beaudry Avenue at Alpine Street, and widen the sidewalks adjacent to the Project Site. Further, as provided in Section IV.L. Transportation, of this Draft EIR, the Project would include implementation of a TDM program (pursuant to Mitigation Measure TR-MM-1) that would promote non-automobile travel (i.e., active/non-motorized transportation, such as bicycling and walking). These Project characteristics would support the reduction of the environment and health of residents by improving air
	quality and encouraging active transportation. Therefore, the Project would not conflict with this goal.
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	No Conflict. The No-Hotel Development Scenario would develop up to 827 units, consisting of one- and two-bedroom residential units, and would include up to 76 restricted affordable housing units. The Project is located within a highly urbanized area within walking distance of a variety of uses, including a major job center and mixed use composition. Furthermore, the Project is located within a designated SCAG High-Quality Transit Area ⁴ and City of Los Angeles Transit Priority Area, as defined in the

<u>Goals</u>	Would the Project Conflict?
	City's Zoning Information File No. 2452 and is supported by multiple transportation options, as discussed above. Thus, the Project would not conflict with this goal.
Strategy: Focus Growth Near Destinations & Mobility Options • Emphasize land use patterns that facilitate	No Conflict. As discussed above, the Project Site is located within Transit Priority Area and a High-Quality Transit Area. Additionally, the Project Site is located
multimodal access to work, educational and other destinations	along a transit corridor that is well-served by public transit. There are bus stops and several bus lines that run adjacent to the Project Site. Specifically, Metro Bus Line
Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	2/302 and Metro Bus Line 4, which run east/west along Sunset Boulevard, have a stop located adjacent to the Project Site at Sunset Boulevard and Beaudry Avenue. Metro Bus Line 2/302 and Metro Bus Line 4 connect
Plan for growth near transit investments and support implementation of first/last mile strategies	Downtown Los Angeles with Pacific Palisades and West Los Angeles, respectively. Metro Rapid 704, which also runs along Sunset Boulevard, has a stop at Sunset Boulevard and Figueroa Street. This line connects
Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses	Downtown Los Angeles with the City of Santa Monica. The Project Site is also located one block from a Metro Bus Line 10 stop that runs east/west along Temple Street.
Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods	In addition, the Project Site is near the LADOT Dash Lincoln Heights/Chinatown bus line that connects with the Chinatown Gold Line Station which has connections to
Encourage design and transportation options that reduce the reliance on and number of	Union Station and Downtown Los Angeles. The No-Hotel Development Scenario would replace the existing vacant buildings and provide housing and new
solo car trips (this could include mixed uses or locating and orienting close to existing destinations)	employment opportunities by constructing up to 827 residential units, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor
Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	area. Additionally, the No-Hotel Development Scenario would incorporate numerous common and private open space and recreational amenities within the Project Site.
<u>parking)</u>	The Project would also provide bicycle parking to encourage use of alternative modes of transportation. Based on its urban location on an underutilized site with
	access to public transit and alternative forms of transit and its proposed mix of uses, the Project would help to: promote land use patterns that facilitate multi-modal
	access; promote a jobs/housing balance to reduce commute times and expand job opportunities; promote the development of underutilized land; and encourage
	transportation options that reduce reliance on solo car trips. In addition, the Project would "right size" parking by not exceeding the parking requirements for the proposed
	Project uses. Thus, overall, the Project would serve to provide growth near destinations and mobility options. Refer to the SCAG goals above for further details. The Project would therefore not conflict with this land use

<u>2043 KTF/3C3)</u>	
<u>Goals</u>	Would the Project Conflict?
	strategy.
Strategy: Promote Diverse Housing Choices Preserve and rehabilitate affordable housing and prevent displacement Identify funding opportunities for new workforce and affordable housing development Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	No Conflict. As the Project Site is currently occupied by vacant buildings where no residential uses exist, the Project would not displace housing. As described in Goal 9 above, the Project would provide a range of unit types. Specifically, the No-Hotel Development Scenario would develop up to 827 units, consisting of one- and two-bedroom residential units, and would include up to 76 restricted affordable housing units. The actions under this strategy associated with incentives to reduce regulatory barriers and streamline housing development that reduces greenhouse gases are geared to the local jurisdictions and not to development projects. Overall, the Project would provide diverse housing choices and would not conflict with this land use strategy.
Strategy: Leverage Technology Innovations Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation Strategy: Support Implementation of Sustainability Policies Pursue funding opportunities to support local	No Conflict. The Project would meet the City's electric vehicle requirements to provide parking facilities capable of supporting future EVSE, as well as parking spaces equipped with EV charging stations. Pursuant to City of Los Angeles Ordinance 186,485 and Ordinance 186,488, 30 percent of all new parking spaces would be required to be EV "ready" which will be capable of supporting future EV charging equipment. Additionally, 10 percent of new parking spaces would require EV charging equipment. As discussed above, the Project would also incorporate the use of Energy Star—labeled appliances and would comply with applicable energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond requirements, such as LEED® Certified equivalency. Pursuant to Project Design Feature WAT-PDF-1, the Project would incorporate water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances. These sustainability features would reduce greenhouse gas emissions. The remaining actions to promote these strategies are specific to local jurisdictions and not private development projects. Overall, the Project
sustainable development implementation projects that reduce greenhouse gas emissions Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations Support local jurisdictions in the establishment of EIFDs, CRIAs, or other tax increment or value capture tools to finance	would leverage technology innovations and support implementation of sustainability policies, and the Project would not conflict with these land use strategies.

<u>Goals</u>	Would the Project Conflict?
 sustainable infrastructure and development projects, including parks and open space Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region Continue to support long range planning efforts by local jurisdictions Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy 	
Strategy: Promote a Green Region Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration Integrate local food production into the regional landscape Promote more resource efficient development focused on conservation, recycling and reclamation Preserve, enhance and restore regional wildlife connectivity Reduce consumption of resource areas, including agricultural land Identify ways to improve access to public	No Conflict. As discussed above, the Project would meet the City's electric vehicle requirements to provide parking facilities capable of supporting future EVSE, as well as parking spaces equipped with EV charging stations. As discussed above, the Project would also incorporate the use of Energy Star-labeled appliances and would comply with applicable energy efficiency requirements such as CalGreen, as well as include energy conservation measures beyond requirements, such as LEED® Certified equivalency. Pursuant to Project Design Feature WAT-PDF-1, the Project would incorporate water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances. The actions in this strategy associated with supporting development of local climate incentives adaptation and hazard mitigation plans as well as local policies for renewable energy production; integrating local food production into the regional landscape; preserving,
Source: Eyestone Environmental, 2021.	enhancing, and restoring local wildlife connectivity; reducing consumption of resources areas; and identifying ways to improve access to public parks are geared to the local jurisdictions and not to development projects. Overall, the Project would promote more resource efficient development.

SCAG, GIS & Data Services, High Quality Transit Areas (HQTAs) SCAG Region, https://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c 3_0/explore?location=34.069966%2C-118.242391%2C12.85, last modified on February

- 22, 2021. accessed on August 23, 2021. The RTP/SCS defines HQTAs as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.
- SCAG, GIS & Data Services, High Quality Transit Areas (HQTAs) SCAG Region, https://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c 3_0/explore?location=34.069966%2C-118.242391%2C12.85, last modified on February 22, 2021. accessed on August 23, 2021. The RTP/SCS defines HQTAs as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.

Appendix U

Volume 9, add Appendix U, Pedestrian Access Diagram, which is appended to this Final EIR.

Appendix V

Volume 9, add Appendix V, Draft Soil and Site Management Plan, which is appended to this Final EIR.

Appendix W

Volume 9, add Appendix W, Construction and Operational Health Risk Assessment, which is appended to this Final EIR.

Appendix X

Volume 9, add Appendix X.1, Transportation Assessment Memo, and Appendix X.2, VMT Tables and Calculator Outputs, which are appended to this Final EIR.

Appendix Y

Volume 9, add Appendix Y, Shade/Shadow Study, which is appended to this Final EIR.

C. 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:

- 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. As provided by the discussion below, the revisions, clarifications, and corrections to the Draft EIR would not result in new significant impacts or increase any impact already identified in the Draft EIR.

With respect to the additions and corrections to Executive Summary, GHG, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Tribal Cultural Resources, and Alternatives, the additions and corrections above are limited to

typographical errors and minor revisions. These additions and corrections would not result in new significant impacts or increase the impacts of the Project.

With respect to Air Quality, the detailed health risk assessment prepared and included in the Final EIR does not affect the significance conclusions regarding toxic air contaminants. The conclusions presented in the Draft EIR that the Project (under both development scenarios) would have no significant impact with respect to toxic air contaminants are confirmed with the analysis above. No change to the Project nor commitment to new project design features or mitigation measures were required to reach this conclusion. Therefore, this change does not constitute significant new information, as no new significant and unavoidable impacts were identified, and there is no need to recirculate the Draft EIR.

With respect to Transportation, the change to the threshold of significance does not affect the quantified calculations of household VMT per capita or work VMT per employee. The conclusions presented in the Draft EIR that the Project (under both development scenarios) would have no significant impact with respect to VMT are confirmed with the analysis above and the reclassification of Project Design Feature TR-PDF-2 as Mitigation Measure TR-MM-1. No change to the Project nor commitment to new TDM measures were required to reach this conclusion. Therefore, this change does not constitute significant new information, as no new significant and unavoidable impacts were identified, and there is no need to recirculate the Draft EIR.

Based on the supplemental analysis presented above, the revisions, clarifications, and corrections to the Draft EIR and the modifications to the original Project do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR or disclose a feasible alternative or mitigation measure the Applicant has declined to adopt. The revisions to the Draft EIR clarify, amplify, or refine the information in the Draft EIR. Thus, none of the conditions in Section 15088.5 of the CEQA Guidelines are met and recirculation of the Draft EIR is not required.