

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

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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 713 East 5th Street 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 any new significant environmental impacts or a substantial increase in any significant impacts identified in the Draft EIR.

This section is divided into three parts: Subsection III.A, Corrections and Additions to Draft EIR Sections and Appendices; and Subsection 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 ~~strike through text~~ and additions are shown in underlined text. Such changes are presented by EIR section.

### **I. Executive Summary**

The corrections for the Draft EIR sections described below also apply to the executive summary of the Draft EIR.

### **II. Project Description**

Volume 1, Section II, Project Description, pages II-5 and II-6, last two paragraphs of page II-5, revise text and renumber subsequent footnotes as follows:

The Project Site is located within the Greater Downtown Housing Incentive Area (GDHIA). The GDHIA, ~~created~~ adopted pursuant to Ordinance No. 179076, provides a number of development modifications and incentives to encourage the production of housing in the Greater Downtown ~~Housing Incentive Area~~ Los Angeles area. These ~~incentives~~ modifications, per LAMC 12.22.C.3, apply to all lots in the R4, RAS4, R5, CR, C2, C4, and C5 Zones in the GDHIA and include no density limitation, no yard requirement, buildable area being the same as lot area, and no prescribed percentage of required open space that must be provided as common or private.<sup>5</sup> ~~The Project, in particular, would include the following incentives: (1) providing open space, including trees, pursuant to Section 12.21.G reduced by one-half; (2) not providing parking for dwelling units for households earning less than 50 percent Area Medium Income; and, (3) providing no more than one parking space (including space allocated for guest parking) for each dwelling unit.<sup>6</sup>~~

The Project Site is also within the boundaries of the Community Redevelopment Agency's Central Industrial Redevelopment Project Area, ~~the Greater Downtown Housing Incentive Area, and the City's Residential Hotel Unit Conversion and Demolition Ordinance, and~~ the former Los Angeles State Enterprise Zone, and is located within a Transit Priority Area (TPA) pursuant to Senate Bill (SB) 743.<sup>76</sup> SB 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment." PRC Section 21099 applies to the Project as the Project is a residential development that meets PRC Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. Therefore, as shown in Figure II-3 on page II-7, the Project is located in a TPA pursuant to SB 743 and as defined by the City of Los Angeles Department of City Planning ZI No. 2452.<sup>87</sup> In addition, the Project Site is located within the boundaries of a potentially eligible historic district, which was identified through SurveyLA as the Fifth Street Single Room Occupancy Historic District. The Project Site is identified as a Contributor to this potentially eligible historic district.

<sup>5</sup> *City of Los Angeles, LAMC Section 12.22A29(e)C 3.*

<sup>6</sup> ~~*City of Los Angeles, LAMC Section 12.22A29(e).*~~

Volume 1, Section II, Project Description, page II-9, third full paragraph, revise text as follows:

Overall, the eight-story building would contain 33,007 square feet of total floor area. Residential supportive service uses would be located on Floor 2 while common amenity areas would be provided on the ground floor, Floor 2, and Floor 8, as shown in Figure II-4 and Figure II-6, on pages II-11 and II-13, respectively. The residential units would be located on Floors 2 through 8 and would comprise 30,934 square feet of total floor area. The dwelling units, which are proposed as efficiency/studio units, would range from 395 to 406 square feet, with an average size of ~~420~~ 405 square feet. The proposed manager's unit is a two-bedroom unit comprising 815 square feet. The existing residential building to be removed does not provide supportive services on-site, nor does it contain private bathrooms and showers within each dwelling unit. The existing building consists of rooms that currently range from 122 to 180 square feet, plus an existing manager's unit comprising 433 square feet.

Volume 1, Section II, Project Description, page II-10, last paragraph, revise text as follows and add footnote 11a:

The Project would require a General Plan Amendment to the Central City Community Plan to ~~change~~ amend the land use designation of the Project Site from Light Manufacturing to Regional Commercial and a Vesting Zone Change and Height District Change from M2-2D to ~~G2-4~~ C2-4D<sup>11a</sup> to permit the construction of a new affordable housing project with a FAR of 6:1, or 33,007 square feet of floor area. ~~With a buildable area of 5,506 square feet, a 6:1 FAR would permit a total of 33,036 square feet of floor area within the Project Site. The Project's proposed floor area of 33,007 square feet would be within the permitted FAR of 6:1 under the proposed C2-4 Zone. As set forth above, the Project proposes a floor area of 33,007 square feet. In addition, the Project would require a Site Plan Review in which the Project would request utilization of the floor area bonus system that has been established for projects within the Greater Downtown Housing Incentive Area, including: (1) reduction in open space requirement pursuant to Section 12.21.G by one-half; (2) no parking required for dwelling units for households earning less than 50 percent of the Area Medium Income; and (3) no more than one parking space (including spaces allocated for guest parking) shall be required for each dwelling unit. The proposed Project is for the construction of a 100-percent affordable housing development with a total of 51 residential dwelling units. Of the 51 units, 50 would be set aside as Restricted Affordable Units, with a minimum of 5 percent of the units set aside for Extremely Low Income households and 11 percent for Very Low Income households, and one unit set aside as a manager's unit. Pursuant to the LAMC Section 11.5.11(e) and California Government Code 65915(k), the~~

Project Applicant is also requesting: (1) reduction in open space required by Section 12.21.G; (2) no parking space shall be required for Restricted Affordable units set aside for permanent supportive housing.

<sup>11a</sup> It is anticipated that the City will include a Development Limitation, referred to as a D condition limiting the floor area to a 6:1 floor area ratio.

Volume 1, Section II, Project Description, pages II-15 and II-17, last paragraph on page II-15 and first paragraph on page II-17, revise text and revise footnote 12 as follows:

~~As discussed above, the Project would provide the required open space as set forth by LAMC Section 12.21-G<sup>12</sup> and the 50 percent reduction provided for projects within the Greater Downtown Housing Incentive Area. As required by LAMC Section 12.21-G, the required open space for the Project would be 5,125 square feet. However, the Applicant is requesting a Developer Incentive per LAMC Section 11.5.11(e) to deviate from the Open Space requirements contained in LAMC Section 12.21 G. Specifically, the Project would provide approximately 2,562.5 square feet of open space, which would consist of 1,282.5 1,922 square feet of exterior common open space provided on the roof top, 1,280 640.5 square feet of interior common open space, and seven<sup>12</sup> trees. Of the exterior common open space, 480.5 square feet would be landscape area. The roof deck would include two outdoor roof terraces, trees, a flex/community room, and various recreational elements, such as a vegetable garden, ping pong tables, outdoor seating, and BBQ area for residents. Floor 2 would also include a small patio for use by the residents. The remaining interior common open space would be provided on the ground floor and include a resident amenity area equipped with a kitchen, and a residents' lounge on Floor 2. The landscaping plans for the ground floor and roof deck are illustrated in Figure II-9 on page II-18.~~

As part of the Project, one Callery Pear tree located in the sidewalk in front of the Project Site along 5th Street would be removed to accommodate the development of the Project. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, two replacement trees and shrubs would be planted on the ground level and in the sidewalk. ~~In addition, as discussed above, pursuant to Section 12.21.G, the required number of trees on the Project Site would reduced by 50 percent. Thus, the required number of trees on-site would be seven trees, which is approximately one-half of the 13 trees required by the LAMC. The seven trees would be provided on the roof deck, which would also be landscaped with a variety of planters and a vegetable garden. The landscaping plans for the ground floor and roof deck are illustrated in Figure II-9 on page II-18.~~

<sup>12</sup> ~~LAMC Section 12.21 G requires the Project to provide 5,125 square feet of open space (i.e., 100 square feet for each unit having less than three habitable rooms and 125 square feet for each unit having three habitable rooms) if no reduction is applied. This number does not include the 2 to 1 replacement requirement by Urban Forestry when removing a street tree.~~

Volume 1, Section II, Project Description, page II-21, revise the requested permits and approvals and revise footnote 13 as follows:

- Pursuant to LAMC Section 11.5.6, as authorized by the Los Angeles Charter Section 555, the Applicant requests approval of a General Plan Amendment to the Central City Community Plan to revise the land use designation in the Central City Community Plan land use designation from Light Manufacturing to Regional Commercial to permit the construction of a new affordable housing project containing a maximum of 51 residential units of which 50 will be set aside as Restricted Affordable Efficiency Dwelling units, at a Very Low Income level, with a minimum of 5 percent of the units set aside for Extremely Low Income households and 11 percent for Very Low Income households for formerly homeless individuals, and approximately 433 square feet of space for residential supportive services;
- Pursuant to LAMC Section 12.32-F & 12.32-Q, the Applicant requests approval of a Vesting Zone Change and Height District Change from M2-2D to C2-4D<sup>13</sup> to permit the construction of a new affordable housing project containing a maximum of 51 residential units of which 50 will be set aside as Restricted Affordable Efficiency Dwelling units, at a Very Low Income level, with a minimum of 5 percent of the units set aside for Extremely Low Income households and 11 percent for Very Low Income households for formerly homeless individuals, and approximately 433 square feet of space for supportive services. The height district change from Height District 2D to Height District 4 would allow for a FAR of up to 6 to 1;
- Pursuant to LAMC Section 11.5.11 (e) and California Government Code Section 65915(k), the Applicant is requesting the following two Developer incentives:
  - i. 2,562.5 square feet of Open Space and 7 trees (50-percent reduction in required open space and 50-percent reduction in the number of trees) in lieu of the 5,125 square feet of open space and 13 trees required pursuant to LAMC Section 12.21 G.

ii. No parking space shall be required for Restricted Affordable units set aside for permanent supportive housing;

- Pursuant to LAMC Section 16.05, a Site Plan Review for a residential building located within the Greater Downtown Housing Incentive Area.<sup>13</sup>
- ~~Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, a demolition permit, street tree removal (if required), temporary street closure permits, grading permits, foundation permits, and building permits. Pursuant to various sections of the LAMC, the Applicant will request approvals and permits from the Building and Safety Department (and other municipal agencies) for Project construction actions including, but not limited to, the following: demolition, street tree removal, and excavation.~~

<sup>13</sup> ~~The Project is using incentives in the Greater Downtown Housing Incentive Area as follows: reduce open space, including trees, requirement pursuant to Section 12.21.G by one-half; no parking required for dwelling units for households earning less than 50 percent of the Area Medium Income; and no more than one parking space (including space allocated for guest parking) shall be required for each dwelling unit. It is anticipated that the City will apply a Development limitation, referred to as a D condition, capping the site floor area to 6 to 1.~~

## IV.D. Land Use

Volume 1, Section IV.D, Land Use, page IV.D-14, revise the second full paragraph and add footnote 21a as follows:

~~The Project Site is also located in the Greater Downtown Housing Incentive Area (GDHIA), was created by adopted pursuant to Ordinance No. 179076. Incentives offered to produce housing in this area are set forth in of the City of Los Angeles, which provides a number of development regulation modifications and incentives to encourage the production of housing in the Greater Downtown Los Angeles area. These modifications, per LAMC Section 12.22 C 3 and, apply to all lots in the R4, RAS4, R5, CR, C2, C4, and C5 Zones in the GDHIA and include no density limitation on the maximum number of dwelling units and limited restrictions on yard and open space requirements, subject to certain conditions. Floor area bonuses also are permitted in this area, as set forth in LAMC Section 12.22 A 29. As the Applicant is proposing affordable dwelling units, the development incentives allowed in the Greater Downtown Housing Incentive Area would apply to the Project, no yard requirement, buildable area that is the same as lot area, and~~

no prescribed percentage of required open space that must be provided as common or private.<sup>21a</sup>

<sup>21a</sup> City of Los Angeles, LAMC Section 12.22 C 3.

Volume 1, Section IV.D, Land Use, page IV.D-18, revise the first full paragraph as follows:

The Project is a ~~mixed-use~~ 100 percent affordable housing project that includes up to 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units<sup>24</sup> and one manager's unit, 433 square feet of residential supportive service uses, and one parking space. Of the 51 units, 50 would be set aside as Restricted Affordable Units, with a minimum of 5 percent of the units set aside for Extremely Low Income Households and 11 percent for Very Low Income Households, and one unit set aside as a manager's unit. The Project Site is located on an infill site that is less than 0.5 mile from several major transit stops. Specifically, the Gold Line Little Tokyo/Arts District Station, a soon-to-be regional transit connector,<sup>25</sup> is located approximately 0.5 mile north of the Project Site. Additionally, the Los Angeles County Metropolitan Transportation Authority (Metro) and Los Angeles Department of Transportation (LADOT) operate numerous bus lines with stops located in close proximity to the Project Site, the majority of which provide frequency of service intervals of 15 minutes or less during peak hours. Therefore, the Project is located in a transit priority area, as shown in Figure II-3 in Section II, Project Description, of this Draft EIR. In addition, the City's Zone Information and Map Access System (ZIMAS) confirms the Project Site's location within a transit priority area, as defined in City Zoning Information (ZI) File No. 2452.<sup>26</sup>

Volume 1, Section IV.D, Land Use, starting on page IV.D-48, add the following text and footnotes 30a and 30b to the Central City Community Plan analysis:

*(ii) Central City Community Plan*

The Project's consistency with the objectives and policies set forth in the Community Plan is analyzed in Table IV.D-3 beginning on page IV.D-49. As discussed therein, the Project would be generally consistent with the objectives and policies that support the Community Plan's goals. In particular, the Project would support the City's objectives and policies to increase the range of housing choices available to Downtown employees and residents. In addition, the Project would preserve the low-income housing stock. The Project would develop up to 51 residential units, which would

consist of 50 Restricted Affordable Efficiency Dwelling units and one manager's unit. The Project would ensure ~~that~~ that the housing stock for Very Low Income and homeless persons would be protected with permanent affordable housing, which would also include supportive services for homeless persons and those at risk of becoming homeless. The Project would replace an aging building with a new residential building containing restricted affordable dwelling units and space for supportive services for residents.

The Applicant requests a General Plan Amendment to revise the land use designation in the Community Plan from Light Manufacturing (corresponding to the M2 Zone) to Regional Commercial (corresponding to the C2 Zone). As part of the requested permits and approvals for this Project, the Applicant is also requesting a Vesting Zone Change/Height District Change from M2-2D to C2-4D. The Central City Community Plan Map includes two relevant footnotes. Footnote 2 limits Height District 2 sites to a 3:1 floor area ratio without a Transfer plan, while Footnote 3 limits Height District 3 and 4 to a 6:1 floor area limit without a Transfer plan. The Project is requesting a Height District 4 designation and is proposing a floor area ratio of 6:1. Consequently, the Project will be consistent with the Community Plan footnotes.

The Project Site is located in the Central City East district of the Community Plan. Central City East has approximately 6,500 single room occupancy (SRO) hotel units that are the primary source of housing for the area. The Community Plan notes that, in an effort to "foster the development of a residential neighborhood, Central City East has been targeted as a priority intervention area for the rehabilitation of the area's SRO hotels."<sup>30a</sup> The Community Plan also observes that the area is a center of social services including alcohol treatment programs and mental health services, and that the area includes such programs as job training, transitional housing and homeless outreach. The Project helps to foster the development of a residential neighborhood by demolishing an aging residential hotel and constructing an eight-story building with common space and supportive services for the residents. The Project proposes to be a suitably designed building that would provide permanent affordable housing for homeless persons. The architectural design maximizes the use of a small site by addressing the needs of the program, including permanent affordable housing, supportive services, common amenity areas, open space, and service spaces, while responding to the existing surroundings in a sensitive manner. As discussed in Section II, Project Description, of this Draft EIR, the design of the Project is intended to provide a building that is contemporary

but evokes the traditional vernacular style of the adjacent buildings. The building's massing would be minimized by differentiating between the first three floors and the floors above with the use of different building materials and treatments.

<sup>30a</sup> *Central City Community Plan, page I-10.*

The Project is consistent with the following objectives of the Central City Community Plan:

Objective 1-2: To increase the range of housing choices available to Downtown employees and residents.

Objective 1-3: To foster residential development which can accommodate a full range of incomes.

Objective 1-5: To preserve the existing low-income housing stock, including single room occupancy (SRO) units.

Policy 1-5.1: Monitor the supply of low-income housing stock to guard against loss of units through demolition, conversion, and deterioration of units.

The Project would provide an improved range of housing choices for the Restricted Affordable units and homeless population that seeks better opportunities in the Central City East area of the Community Plan. The Project would preserve the existing low-income housing stock, including the SRO units located in Central City East, which are the primary source of housing for the area. Consistent with the Community Plan's policy to monitor the supply of low-income housing, the Project would ensure that the housing stock for Restricted Affordable units and homeless persons would be protected with permanent affordable housing, which would also include independent living and supportive services that are greatly needed by the homeless and those at risk of becoming homeless. The Project would replace aging, outmoded buildings with the new construction of restricted affordable dwelling units in a development with high quality design that promotes independent living and provides space for residential supportive services.

The Project would offer better housing choices for the homeless individuals that are often relegated to shelters or transitional housing. The Project also brings new residential units to an area which consists of a mix of residential, commercial, and industrial uses, but which offers several options

to place residents within easy walking distance of employment opportunities and to have several public transit alternatives to access jobs and services in the Downtown area.

The Project would guard against the loss of units through conversion or deterioration of units, as the new construction of restricted affordable units would guarantee the long-term supply of low-income housing stock. The Applicant proposes permanent affordable housing with the supportive services designed to ensure that the homeless persons remain housed and get the individualized help they need. The Project would target the chronically homeless individuals as permanent residents, while providing access to the residential supportive services to be provided within the ground level of the development.

Objective 9.1: To address the problems of the homeless population by creating a mix of policies, services and facilities that better serve their needs.

Policy 9-1.1: Preserve the existing affordable housing stock through rehabilitation and develop new affordable housing options.

Program: Retain and develop new supported housing opportunities for homeless people.

Objective 9.2: To provide the requisite services, housing opportunities, and community environments to allow the homeless to rejoin the workforce and lead more productive lives.

The Community Plan's Chapter III "Land Use Policies and Programs" contains a section entitled "Social Services." The Community Plan observes that "Downtown offers the largest concentration of social services in the region and has the largest concentration of homeless people. The population is attracted by these social services and the affordable housing resources available Downtown." The Community Plan notes that a "large number of Single Room Occupancy buildings" are situated in the Central City East District which is a center for "transitional housing" and "homeless outreach."

The Project would provide 50 Restricted Affordable Efficiency Dwelling Units to homeless individuals, which is consistent with the objectives and policies of the "Social Services" section of the Community Plan by providing permanent affordable housing units. The Project preserves and enhances the existing affordable housing stock by replacing existing affordable units with slightly more affordable units that are more livable and are now

augmented with supportive services and facilities that better serve the needs of lower income households.

The Department of City Planning is partnering with the Downtown community to update Downtown’s two community plans, including the Central City Community Plan, as part of the department’s New Community Plan Program. The update would build on Downtown’s transit rich nature and apply new zoning tools developed as part of the City’s re:code LA Project. This planning process is part of the “DTLA 2040” initiative to update the two community plans. The DTLA 2040 Project recognizes that Downtown “is amidst a booming renaissance and one of the most rapidly changing places in Los Angeles” and that “according to regional Projections, Downtown will be adding approximately 125,000 people, 70,000 housing units and 55,000 jobs by the year 2040.”<sup>30b</sup>

<sup>30b</sup> DTLA 2040 website: [www.dtl2040.org/](http://www.dtl2040.org/).

DTLA 2040 observes that “a strong core is important to the health of the City” and that it will help shape “the future of Downtown Los Angeles, by reinforcing its jobs orientation; supporting a transit and pedestrian environment; growing and supporting its residential community; strengthening the unique character of each neighborhood; and creating linkages between Downtown’s many distinct districts.”

DTLA 2040 establishes the following core principles to represent the long-term priorities for the Downtown Community Plans:

- Accommodate anticipated growth through 2040
- Support and sustain Downtown’s ongoing revitalization
- Reinforce Downtown’s jobs orientation
- Grow and support the residential base
- Promote a transit, bicycle, and pedestrian friendly environment
- Strengthen neighborhood character
- Create linkages between districts

Downtown is described by DTLA 2040 as “a collection of places.” Not to be confused with the neighborhoods, “Place Types are purely descriptive

of the broad common conditions the Downtown Community Plan seeks to create in terms of physical built form and the functional use aspects that differentiate one area from another. These places vary in the height, land use mix, massing, and feel of the buildings along the street.”

The Project Site is located on the western boundary of the “Hybrid Industrial” Place Type, which is described by places that “have a distinct urban form characterized by medium and low scale development with an industrial legacy. It is anticipated that FAR could be equal to 6:1. High-quality new construction and repurposed structures collectively promote a resourceful approach to urban development that can evolve over time. These areas preserve productive activity and prioritize space for employment, including light industrial, new industry, commercial, and vertically-integrated businesses, with careful introduction of live-work uses. The industrial legacy is reflected with a network of irregular streets, punctuated by occasional passageways. The street, block, and building pattern has evolved into an inviting environment for pedestrians and cyclists.”

The Project would be consistent with many of DTLA 2040’s core principles, as it supports revitalization of aging developments, supports the residential population, promotes a transit, bicycle, and pedestrian-friendly environment, and strengthens the neighborhood character. The Project would fit with the “Hybrid Industrial” urban form by the introduction of high-quality new construction that promotes a resourceful approach to urban development that can evolve over time. The “Hybrid Industrial” Place Type is immediately adjacent to the north of the “Markets” Place Type, which is described as an area “comprised of medium-scale buildings that accommodate wholesale, commercial, retail, limited housing, and goods movement activity.” The “Markets” Place Type is also described as “bustling centers of commercial activity” wherein nodes of activity result in local and regional patrons spilling out “from the storefronts on to sidewalks and active alleys, creating a high-energy street life that is sustained throughout much of the day and night.” With the immediate proximity of the “Markets” Place Type, the Project would grow and support the residential base of Downtown where residents would be within walking distance of a variety of commercial uses and neighborhood-serving retail services. The proximity of a variety of commercial and retail activities would offer employment opportunities to the Restricted Affordable units and homeless residents. The contemporary design of the new construction for the Applicant’s residential development would create the type of urban form that is contemplated by the “Hybrid Industrial” Place Type. The Project would be consistent with DTLA 2040’s vision to promote a dynamic, healthy and sustainable Downtown Core.

Volume 1, Section IV.D, Land Use, starting on page IV.D-57, revise the text under the Los Angeles Municipal Code analysis as follows:

*(v) Los Angeles Municipal Code*

The Project is a residential development that would develop up to 51 residential units, which would consist of 50 Restricted Affordable Efficiency Dwelling units and one manager's unit, 433 square feet of residential supportive service uses, and one parking space. The proposed uses would be located within a new eight-story building comprised of up to 33,007 square feet of floor area, including 433 square feet of residential supportive service uses, and 1,640 square feet of common areas. Upon completion of the Project, the total FAR on the Project Site would be 6:1.

The entire Project Site is zoned by the LAMC as M2-2D (Light Manufacturing Zone, Height District 2D), as shown in Figure IV.D-1 on page IV.D-9 and Figure IV.D-2 on page IV.D-15. The total floor area contained in the building on a lot in Height District No. 2 is limited to six times the buildable area; however, the "D" limitation limits the floor area to a maximum of a 3:1 FAR on the Project Site.<sup>32</sup> The Project would require a General Plan Amendment to the Community Plan to ~~change~~ amend the land use designation of the Project Site from Light Manufacturing to Regional Commercial, as shown in Figure IV.D-3 on page IV.D-58, and a Vesting Zone Change and Height District Change from M2-2D to C2-4D, as shown in Figure IV.D-4 on page IV.D-59, to permit the construction of a new affordable housing project with a FAR of 6:1, or 33,007 square feet of floor area. ~~With a buildable area of 5,506 square feet, a 6:1 FAR would permit a total of 33,036 square feet of floor area within the Project Site. As set forth above, the Project proposes a floor area of 33,007 square feet. In addition, the Project would request utilization of by right incentives offered by the Greater Downtown Housing Incentive Area, including: (1) reduction in open space requirement pursuant to Section 12.21.G by one half; (2) no parking required for dwelling units for households earning less than 50 percent of the Area Medium Income; and (3) no more than one parking space (including spaces allocated for guest parking) shall be required for each dwelling unit. The Project's proposed floor area of 33,007 square feet would be within the permitted FAR of 6:1 under the proposed C2-4D zone. The proposed Project is for the construction of a 100-percent affordable housing development with a total of 51 residential dwelling units. Of the 51 units, 50 would be set aside as Restricted Affordable Units, with a minimum of 5 percent of the units set aside for Extremely Low Income households and 11 percent for Very Low Income households, and one unit set aside as a manager's unit. Pursuant to~~

the LAMC Section 11.5.11(e) and California Government Code Section 65915(k), the Project Applicant is requesting: (1) reduction in open space required by Section 12.21.G; (2) no parking space shall be required for Restricted Affordable units set aside for permanent supportive housing. Thus, with the approval of the General Plan Amendment/Height District Change, the Project would be consistent with the LAMC. With regard to LAMC parking requirements, ~~as discussed above, the Project would request utilization of the by-right incentives offered by the Greater Downtown Housing Incentive Area that would allow projects with dwelling units for households earning less than 50 percent of the Area Medium Income not to provide residential parking spaces, and to provide no more than one parking space (including spaces allocated for guest parking) for each dwelling unit. Based on these incentives, the Project Applicant is requesting a Developer Incentive per LAMC Section 11.5.11(e) and California Government Code Section 65915(k) to provide no parking spaces for Restricted Affordable units set aside for permanent supportive housing. Per LAMC Section 12.21.A.4(p), the manager's unit is subject to the Central City parking exception, which permits one parking space per dwelling unit for developments with six or less dwelling units.~~ The Project would be required to provide one parking space for the manager's unit. Accordingly, the Project would include one parking space, which would be accessed from the alley directly adjacent to and north of the Project Site. The Project would also provide 46 long- and short-term bicycle parking spaces on-site per the LAMC. Therefore, the Project would comply with applicable LAMC vehicular and bicycle parking requirements.

As discussed above, the Project would replace the existing Edward Hotel, which contains 46 SRO units and one manager's unit with a new residential building containing 50 Restricted Affordable Efficiency Dwelling units and one manager's unit. As required by LAMC Section 12.21-G, the required open space for the Project would be 5,125 square feet. However, ~~as permitted by LAMC Section 12.22 A 29 (c)(2)<sup>23</sup>, a 50 percent reduction is permitted for projects within the Greater Downtown Housing Incentive Area. maximum interior space is calculated to be 25 percent of the required open space, or 1,281.3 square feet.~~ the Project Applicant is requesting a Developer Incentive per LAMC Section 11.5.11(e) and California Government Code Section 65915(k), a modification to the Open Space requirements contained in LAMC Section 12.21 G. In lieu of providing 5,125 square feet of total Open Space and 13 trees, the Project would provide approximately 2,562.5 square feet of open space, which would consist of 1,922 square feet of exterior common open space, 640.5 square feet of interior common open space, and seven trees. Of the exterior common open space, 480.5 square feet would be landscape area. The Project would provide 2,562.5 square

feet of open space, which would consist of ~~4,282.5~~1,922 square feet of exterior common open space provided on the roof and ~~4,280~~640.5 square feet of interior common open space. Therefore, based on the above, the Project would ~~provide required open space as set forth in~~ utilize the Developer Incentives offered by LAMC Section 11.5.11(e) to be in substantial conformance with the incentives offered within LAMC Section 12.22 A 29 (c) (2)1-G with the 50 percent allowable reduction for projects within the Greater Downtown Housing Incentive Area.

**Based on the above, the Project would be consistent with applicable LAMC requirements.**

## **IV.G. Energy Conservation and Infrastructure**

Volume 1, Section IV.G, Energy Conservation and Infrastructure, page IV.G-32, first full paragraph, revise text and add footnote 72a as follows:

As shown in Table IV.G-2, the Project would result in a net reduction in the on-site demand for natural gas totaling approximately 104,705 cf per year. When looking at the Project's total natural gas usage not taking into consideration the existing uses on-site, the Project would consume 533,226 cf per year, which translates to 1,461 cf per day, which represents approximately 0.0001 percent of the 2021 forecasted consumption in the SoCalGas planning area. SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.<sup>72a</sup> Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's net increase in demand for natural gas.

<sup>72a</sup> SoCalGas, Will Serve Letter Request for Job ID# 43-2018-00062: 713 5th St., Los Angeles, CA 90013. Will serve letter from Pedro Reyes, dated December 14, 2018. Refer to Appendix F of this Draft EIR.

Volume 1, Section IV.G, Energy Conservation and Infrastructure, page IV.G-34, last paragraph, revise text and add footnote 78a as follows:

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. As stated above, the Project's estimated net reduction in demand for natural gas is 104,705 cf per year. When looking at the Project's total natural gas usage not taking into consideration the existing uses on-site, the Project would consume

533,226 cf per year, which translates to 1,461 cf per day. Based on the 2018 California Gas Report, the CEC estimates natural gas consumption within SoCalGas' planning area will be approximately 2.50 billion million cf per day in 2021 (the Project's buildout year).<sup>78</sup> The Project would account for approximately 0.0001 percent of the 2021 forecasted consumption in SoCalGas' planning area. In addition, SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area, and in general, each related project would be expected to comprise a similarly limited percentage of overall natural gas consumption.<sup>78a</sup> Moreover, SoCalGas forecasts take into account projected population growth and development based on local and regional plans. Therefore, natural gas usage resulting from future operations at many of the related projects is likely accounted for in the SoCalGas projections.

<sup>78a</sup> SoCalGas, Will Serve Letter Request for Job ID# 43-2018-00062: 713 5th St., Los Angeles, CA 90013. Will serve letter from Pedro Reyes, dated December 14, 2018. Refer to Appendix F of this Draft EIR.

## Appendix F—Energy

Volume 3, Appendix F, Energy, replace Appendix F.2 with Revised Appendix F.2, LADWP and SoCalGas Will Serve Letters, which adds the SoCalGas will serve letter to the last page of Appendix F.2.

## B. Effect of Corrections and Revisions

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

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

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental*

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

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

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

With regard to Section II, Project Description, of the Draft EIR, the section was revised to update and clarify the language related to the requested permits and approvals as it relates to the Applicant's updated requested of Developer's Incentives pursuant to LAMC Section 11.5.11(e) and California Government Code Section 65915(k). Related to these changes, Section IV.D, Land Use, of the Draft EIR, incorporates these similar revisions provided in Section II, Project Description, of the Draft EIR, as well as expanding and clarifying the analysis provided for the Project's consistency with the Central City Community Plan, the DTLA 2040, and Los Angeles Municipal Code.

With regard to Section IV.G, Energy Conservation and Infrastructure, of the Draft EIR, revisions made are to clarify that SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area. These revisions would not change the less-than-significant impact determination for energy conservation and infrastructure. Appendix F.2 of the Draft EIR has been updated to include the will serve letter from SoCalGas.

Based on the above, the revisions, clarifications, and corrections to the Draft EIR 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.