

III. REVISIONS, CLARIFICATIONS, AND CORRECTIONS TO THE DRAFT EIR

In accordance with CEQA Guidelines Section 15132(a), this section of the Final EIR provides revisions, clarifications, and corrections to the Draft EIR that have been made to clarify, correct, or supplement the information provided in that document. These revisions, clarifications, and corrections are the result of the responses to public and agency comments received on the Draft EIR, new information that has become available since publication of the Draft EIR, or due to recognition of inadvertent errors or omissions. The revisions, clarifications, and corrections provided in this section do not add significant new information or support a conclusion that the Project would result in new or substantially more severe significant environmental impacts as compared to those disclosed in the circulated Draft EIR.

More specifically, CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to PRC Section 21092.1 and CEQA Guidelines Section 15088.5) but before the EIR is certified. As discussed in Section I, *Introduction*, of this Final EIR, CEQA Guidelines Section 15088.5(a) specifically states the following:

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

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

CEQA Guidelines Section 15088.5 also provides that “[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

As demonstrated in this Final EIR, the changes presented in this section do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA and the CEQA Guidelines.

The supplementary information to the Draft EIR is presented below under the respective EIR section heading, page number, paragraph, and the line within the referenced paragraph. Deletions are shown with ~~strikethrough text~~ and additions are shown with double underline text. Existing text to remain unchanged is included as plain text, without strikethrough or double underlines, to provide context for the revisions, clarifications, and corrections.

1. Executive Summary

1. Pages ES-1 and ES-2, Subsection 1, *Project Description*, revise the last paragraph on page ES-1 that continues onto page ES-2 as follows:

The Project would include a mix of residential, office, and restaurant/retail, ~~and hotel~~ uses within 10 distinct buildings over the Project Site totaling 2,318,534 sf, for a floor area ratio (FAR) of 7.13:1. The Project would include: ~~1,521~~ 1,589 residential units, including affordable housing units, totaling ~~4,731,849~~ 1,761,673 sf; 411,113 sf of office uses; and ~~401,088~~ 145,748 sf of restaurant/retail uses¹; ~~and 68 hotel rooms (74,484 sf of hotel floor area).~~ The Project would include ~~463,325~~ 170,275 sf of Los Angeles Municipal Code (LAMC) required usable open space. In addition, the Project would include 90,113 sf of publicly-accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. The proposed buildings would range in height from two to ~~44~~ 30 stories, with a maximum height of ~~497~~ 364 feet. The Project would provide ~~2,475~~ 2,444 vehicle parking spaces within subterranean parking (up to four levels) and six levels of podium parking in Building 2 and four levels of podium parking in Building 9. The Project would also provide ~~446~~ 163 short-term bicycle parking spaces and ~~596~~ 629 long-term bicycle parking spaces.

¹ The ~~401,088~~ 145,748 square feet of restaurant/retail floor area includes floor area for purposes of calculating floor area per Los Angeles Municipal Code (LAMC) requirements. An additional potential 12,477 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, *Environmental Impact Analysis*, of this Draft EIR, evaluates a total of ~~413,565~~ 158,225 square feet of restaurant/retail uses. It is assumed there would be ~~45,266~~ 67,595 square feet of retail uses and ~~68,299~~ 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

2. Pages ES-5 and ES-6, Subsection 3.a)(1)(b), *Operation*, remove the significant and unavoidable operational impacts as follows:

~~(b) — Operation~~

~~(i) — Project Level~~

~~The analysis of operational air quality impacts analyzed an interim scenario where a portion of the Project Site would be in operation, while a portion of the Project's construction activities would also occur. Thus, with the overlap in operation and construction, emissions were combined as part of this analysis and compared to applicable SCAQMD regional thresholds.~~

~~The Project would result in potentially significant operational impacts due to regional VOC and NO_x emissions above the regional significance thresholds. Mitigation Measures AQ-MM-1 (construction equipment emission reduction features) and AQ-MM-2 (concrete trucks with emission reduction features) would be required to reduce overlapping construction-related NO_x emissions that would be concurrent with the interim regional operational emissions. Mitigation Measure AQ-MM-3 (emergency generator maintenance and testing requirements) would reduce regional VOC and NO_x emissions from operations by scheduling routine maintenance of emergency generators so that only one emergency generator is maintained on any given day. Mitigation Measure AQ-MM-4 would reduce VOC and NO_x emissions from landscaping equipment and Mitigation Measure AQ-MM-5 would reduce VOC emissions associated with coating activities during operations. With implementation of AQ-MM-1 and AQ-MM-2, NO_x emissions would be reduced to below the SCAQMD regional significance threshold from construction activities that would overlap with the interim operations of the Project. However, emissions of CO from construction activities that would overlap with the interim operations of the Project would exceed the SCAQMD regional significance threshold due to the Tier 4 Final equipment and CNG truck engine technology, whereby the technology used to reduce NO_x emissions leads to slightly higher CO emissions. This is the result of NO_x being formed through high combustion temperatures whereas CO is formed through incomplete combustion from lower combustion temperatures. CO is a pollutant of lesser air quality concern as compared to NO_x given that the Air Basin is in attainment for CO but is in non-attainment for ozone, with NO_x constituting an ozone precursor emission. Thus, AQ-MM-1 and AQ-MM-2 represent overall environmentally beneficial mitigation measures as they would reduce emissions of an ozone precursor, NO_x, despite increasing emissions of CO during Project construction activities that would be concurrent with the interim regional operational emissions.~~

~~Therefore, while NO_x impacts related to overlapping construction and interim operational emissions would be mitigated to less than significant with implementation of mitigation measures AQ-MM-1, AQ-MM-2, AQ-MM-3, AQ-MM-4, and AQ-MM-5 CO impacts related to regional emissions during this overlapping short-term timeframe would remain significant and unavoidable after implementation of mitigation measures.~~

(ii) ~~Cumulative~~

~~As the Project's interim operational impacts would be significant and unavoidable, Project CO emissions during the interim scenario where a portion of the Project Site would be in operation, while a portion of the Project would be in construction, combined with emissions from operations of related projects could also exceed the applicable regional CO emissions significance thresholds and would, thus, result in a cumulatively significant and unavoidable impact.~~

3. Pages ES-8 and ES-9, Subsection 3.c)(2), *Off-Site Construction Noise (Cumulative Only)*, revise the 2nd and 3rd paragraphs as follows:

~~For Project-related haul trucks, with implementation of Mitigation Measure NOI-MM-4, Project haul trucks would be prohibited from traveling on Central Avenue between 1st Street and 2nd Street, which would mitigate the Project-level impacts would be to less than significant. However, if the related projects would contribute 31 truck trips per hour or more and travel along the same roadway segments as the Project an additional 130 trips per hour along 1st Street east of Alameda Street, 137 truck trips per hour along Central Avenue between 1st Street and 2nd Street, 122 trips per hour along Central Avenue between 2nd Street and 3rd Street, 171 trips per hour along 4th Street between Hewitt Street and Merrick/Molino Street, and 112 trips per hour along 4th Street between Alameda Street and Hewitt Street (see roadway segments in Table IV.G-10, *Estimate of Off-Site Construction Traffic Noise Impacts*), the combined off-site construction noise from Project haul trucks and related project trucks could exceed the significance threshold.~~

~~For Project-related foundation concrete pour trucks, there is no feasible mitigation measure that would reduce the Project-level impact to below the significance thresholds. Mitigation Measure NOI-MM-4 would reduce concrete truck trips along the identified segments to less than significant on a project-level. Therefore However, related projects contributing any additional truck trips on the same roadway segments at the same time as the Project (see roadway segments in Table IV.G-10) would generate a cumulative noise impact along these same roadway segments.~~

4. Page ES-9, Subsection 3.c)(3)(a), *Project-Level*, revise the 2nd sentence in the 1st paragraph as follows:

~~With implementation of Mitigation Measure NOI-MM-56, potential structural vibration impacts at receptor V3 would be mitigated to a less than significant level.~~

5. Pages ES-9 and ES-10, Subsection 3.c)(3)(b), *Cumulative*, revise the two paragraphs as follows:

~~The Project would implement Mitigation Measures NOI-MM-6 and NOI-MM-7 to reduce construction vibration impacts. Implementation of these mitigation measures would reduce impacts to a less-than-significant level, but because implementation of these~~

~~measures requires the consent of private property owners, which cannot be assured, but not eliminate~~, the Project's groundborne-level construction vibration impacts at receptor location V3 ~~but impacts would remain significant and unavoidable.~~

Although it is expected that ~~the related projects~~ Related Project Nos. 9, 18, and 29 listed with identified significant impacts would implement mitigation that would reduce construction structural vibration impacts similar to the Project, overlapping construction activities could result in significant cumulative impacts. Thus, the Project and ~~related projects~~ Related Project Nos. 9, 18, and 29 could together contribute to construction vibration at receptor V3 that may exceed the structural vibration significance threshold. Thus, it is conservatively concluded that the Project's contribution to cumulative construction vibration associated with on-site construction equipment would be cumulatively considerable and would represent a significant and unavoidable cumulative impact.

6. Page ES-10, Subsection 4.b), *Alternative 2: Above Grade Parking Alternative*, revise the paragraph as follows:

The purpose of Alternative 2 is to reduce the Project's excavation volumes and, thus, reduce the Project's significant and unavoidable construction-related air quality and noise impacts associated with excavation, grading, and hauling. As with the Project, Alternative 2 would remove all the existing buildings and associated surface parking from the Project Site. However, as with the Project, a portion of the Los Angeles Cold Storage Building on the North Site would be retained, if feasible. Alternative 2 would eliminate the Project's subterranean parking garages; reduce the Project's ~~2,475~~ 2,444 parking spaces to 990 spaces, a reduction of 60 percent; and locate all parking in above-grade, enclosed parking podiums within the building footprints. Excavation would be reduced from 651,000 cubic yards (CY) to 36,286 CY, an approximate 94 percent reduction. Alternative 2 would provide the same number of buildings and LAMC calculated floor area (2,318,534 sf) as the Project. ~~The However, the Project's hotel would be removed from the scope of the Project and the Project's residential uses would be increased from 1,521 units to remain at 1,589 units.~~ With the inclusion of parking podiums in the lower stories, the heights of some of the buildings would be greater than under the Project. The configuration of the buildings, including the size of the building footprints and the relative location of the buildings within the Project Site, would be similar to the Project. As with the Project, Alternative 2 would provide ~~443,565~~ 158,225 sf of retail and restaurant uses (indoor and outdoor spaces) and 90,113 sf of landscaped and publicly-accessible open space and paseos at ground level.

7. Pages ES-11, Subsection 4.c), *Alternative 3: Historic Preservation/Reduced Density Alternative*, revise the 5th and 8th sentences of the paragraph as follows:

~~Similar to Alternative 2, the Project's hotel would be removed under Alternative 3.~~ Alternative 3 represents a 30 percent reduction in the Project's 2,318,534 sf of new building floor area and would reduce the Project's FAR from 7.13:1 to 5.90:1. Alternative

3 would retain the Project's open space and paseos on the South Site. Parking would be reduced from the Project's ~~2,475~~ 2,444 spaces to 990 spaces, a 60 percent reduction compared to the Project.

8. Pages ES-11, Subsection 4.d), *Alternative 4: Historic Preservation/Office Use Alternative*, revise the 5th sentence of the paragraph as follows:

Parking would be reduced from ~~2,475~~ 2,444 spaces to 928 spaces, a 62.5 percent reduction compared to the Project.

9. Pages ES-12, Subsection 4.e), *Environmentally Superior Alternative*, revise the 2nd sentence of the 2nd full paragraph as follows:

As shown in **Table V-14 Ability of Alternatives to Meet Project Objectives**, in Chapter V, *Alternatives*, of this Draft EIR, the No Project/No Build Alternative would not achieve the underlying purpose of the Project to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, office, retail, ~~hotel~~ and restaurant uses, as well as publicly-accessible open spaces, that would revitalize the Project Site and the surrounding neighborhood, promote walkability and use of public transit, and enhance the City's economic base.

10. Pages ES-13, Subsection 5, *Summary of Environmental Impacts*, revise the 1st sentence of the 2nd paragraph as follows:

As shown in Table ES-1, based on analyses contained in this Draft EIR the Project would result in significant and unavoidable air quality impacts during construction ~~and during intermittent overlapping construction activities and operations~~, significant and unavoidable impacts related to historical resources, and changes and potential removal of the historic, six-story cold storage building, and temporary construction-related noise and vibration (structural damage) impacts.

11. Pages ES-15, Table ES-1, *Summary of Project Impacts, Project Design Features, and Mitigation Measures*, revise the 4th column in the 1st row as follows:

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
IV.A AIR QUALITY			
CUMULATIVELY CONSIDERABLE INCREASE OF CRITERIA POLLUTANT IN NONATTAINMENT AREA: REGIONAL EMISSIONS			
OPERATION	See Project Design Feature AQ-PDF-1 (construction power pole usage).	See Mitigation Measure AQ-MM-1 (Construction Equipment Features), Mitigation Measure AQ-MM-2 (Concrete Truck Features), Mitigation Measure AQ-MM-3 (Emergency Generator Maintenance & Testing), Mitigation Measure AQ-MM-4 (Electric Landscaping Equipment), and Mitigation Measure AQ-MM-5 (Use of Super-compliant VOC Paints).	- ~~Significant and Unavoidable with Mitigation~~ <u>Less than Significant with Mitigation</u> (during overlapping construction and operations) (Project-Level and Cumulative) - Less than Significant with Mitigation (during full Project operations)

12. Pages ES-27, Subsection 5.b), *Mitigation Measures*, revise Mitigation Measure AQ-MM-1 as follows:

AQ-MM-1: Construction Equipment Features: The Applicant shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at ~~50~~ 25 horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and

maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.

- Contractors shall ensure that all air compressors, cement and mortar mixers, concrete/industrial saws, plate compactors, rollers, signal boards, skid-steer loaders, sweepers/scrubbers and welders used during construction activities are electric powered. Additionally, contractors shall ensure one piece of the following types of equipment from each construction activity that uses them would be electric powered: tractor/loader/backhoes, forklifts, graders, pumps and rough terrain forklifts. In addition, where commercially available for the Project Site, construction equipment shall meet Tier 5 requirements when standards are adopted by CARB. For purposes of this mitigation measure, "commercially available" is defined as equipment built by the original manufacturer and available for lease or hire within 20 miles of the City of Los Angeles and available in a similar timeframe to fossil-fueled options. If Tier 5 engine equipment is not commercially available, the contractor must show proof that the equipment is not commercially available by providing letters from at least two independent rental companies, each of which must own or operate a construction equipment fleet with total maximum horsepower of greater than 2,500 horsepower, for each piece of off-road equipment where the Tier 5 engine equipment is not available. This requirement shall be incorporated into applicable bid documents, purchase orders, and contracts with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment.

2. Chapter II. Project Description

1. Pages II-1 and II-2, Subsection 1, *Introduction*, revise the last paragraph on page II-1 that continues onto page II-2 as follows:

The Project would include a mix of residential, office, and restaurant/retail, ~~and hotel~~ uses within 10 distinct buildings over the Project Site totaling 2,318,534 sf, for a floor area ratio (FAR) of 7.13:1. The Project would include: ~~4,524~~ 1,589 residential units, including affordable housing units, totaling ~~4,731,849~~ 1,761,673 sf; 411,113 sf of office uses; ~~401,088~~ 145,748 sf of restaurant/retail uses¹; ~~and 68 hotel rooms (74,484 sf of hotel floor area).~~ The Project would include ~~463,325~~ 170,275 sf of Los Angeles Municipal Code (LAMC) required usable open space. In addition, the Project would include 90,113 sf of publicly-accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. The proposed buildings would range in height from two to ~~44~~ 30 stories, with a maximum height of ~~497~~ 364 feet. The Project would provide ~~2,475~~ 2,444 vehicle parking spaces within

subterranean parking (up to four levels) and six levels of podium parking in Building 2 and four levels of podium parking in Building 9. The Project would also provide ~~446~~ 163 short-term bicycle parking spaces and ~~596~~ 629 long-term bicycle parking spaces.

¹ The ~~401,088~~ 145,748 square feet of restaurant/retail floor area includes floor area for purposes of calculating floor area per Los Angeles Municipal Code (LAMC) requirements. An additional potential 12,477 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, *Environmental Impact Analysis*, of this Draft EIR, evaluates a total of ~~113,565~~ 158,225 square feet of restaurant/retail uses. It is assumed there would be ~~45,266~~ 67,595 square feet of retail uses and ~~68,299~~ 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

2. Page II-3, Subsection II.2.a), *Project Location*, revise Table II-1, *Project Use and Floor Area Summary*, as follows:

**TABLE II-1
PROJECT USE AND FLOOR AREA SUMMARY**

	Square Feet Residential Floor Area	Square Feet Restaurant/ Retail Floor Area	Square Feet Office Floor Area	Square Feet Hotel Floor Area
North Site				
Building 1	44,660	~~16,378~~ <u>61,038</u>	—	—
Building 2	~~649,911 (449 units)~~ <u>400,222 (335 units)</u>	12,694	—	—
<i>Subtotal North Site</i>	~~694,571~~ <u>400,222</u>	~~29,072~~ <u>73,732</u>	—	—
South Site				
Building 3	—	15,291	81,854	—
Building 4	—	7,721	184,162	—
Building 5	407,217(425 units)	11,359	—	—
Building 6	~~88,228 (68 units)~~ <u>412,401 (250 units)</u>	15,567	—	~~74,484 (68 rooms)~~
Building 7	126,555 (123 units)	12,357	—	—
Building 8	—	4,645	145,097	—
Building 9	293,574(312 units)	5,076	—	—
<i>Subtotal South Site</i>	~~915,574~~ <u>1,239,747</u>	72,016	411,113	~~74,484~~

**TABLE II-1
PROJECT USE AND FLOOR AREA SUMMARY**

	Square Feet Residential Floor Area	Square Feet Restaurant/ Retail Floor Area	Square Feet Office Floor Area	Square Feet Hotel Floor Area
West Site				
Building 10	121,704 (144 units)	—	—	—
Total Floor Areas by Use/Units/Rooms	~~1,731,849~~ (~~1,521 units~~) <u>1,761,673 (1,589 units)</u>	~~401,088~~ <u>145,748^a</u>	411,113	~~74,484~~ (~~68 rooms~~)
Total Floor Area Ratio (FAR): 7.13	Land Area (post-dedication): 325,069 sf		Total Floor Area: 2,318,534 sf	
Total Parking Spaces Provided: <u>2,475 2,444^b</u>	Short-Term Bicycle Spaces Provided: <u>446 163</u>		Long-Term Bicycle Spaces Provided: <u>596 629</u>	

^a The ~~401,088~~ 145,748 square feet of restaurant/retail floor area includes floor area for purposes of calculating floor area per LAMC requirements. An additional potential 12,477 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, *Environmental Impact Analysis*, of this Draft EIR, evaluates a total of ~~443,565~~ 158,225 square feet of restaurant/retail uses. It is assumed there would be ~~45,266~~ 67,595 square feet of retail uses and ~~68,299~~ 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

^b See Table II-5, *Vehicle Parking*, for additional details on Project parking, including reductions on the Project's parking requirements in consideration of the bicycle parking provided per LAMC Section 12.21 A.4.

SOURCE: Studio One Eleven, February 2022. Updated in May 2024.

- Page II-11, Subsection 2.d), *Surrounding Land Uses*, revise the 2nd and 3rd sentences of the 1st paragraph as follows:

Thus, the Project Site is located adjacent to the Arts District, which is an emerging neighborhood in the City's Downtown area and has experienced an increased demand for new retail, ~~hotel~~-creative office, and residential spaces. The Project Site is also situated just south of the Little Tokyo neighborhood and west of the Arts District, where numerous former warehouse and other manufacturing/industrial structures are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses.

- Pages II-11 and II-12, Subsection 3, *Project Objectives*, revise the 2nd paragraph and Objective No. 1 as follows:

The underlying purpose of the Project is to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, office, retail, ~~hotel~~-and restaurant uses, as well as publicly-accessible open spaces, to revitalize the Project Site and the surrounding neighborhood, promote

walkability and use of public transit, and enhance the City's economic base. The Project's specific Project Objectives are as follows:

1. Provide a mixed-use development that introduces an array of new residential, office, ~~hotel~~, and commercial opportunities to the Central City neighborhood.

5. Page II-13, Subsection 4.a)(1), *Project Overview*, revise the 2nd sentence of the 1st paragraph as follows:

On the North Site, the single-story warehouse would also be demolished, however, the Project intends to preserve and adaptively reuse a portion of the existing six-story industrial building on the North Site for ~~retail and residential amenity~~ retail/commercial purposes.

6. Page II-13, Subsection 4.a)(1), *Project Overview*, revise the 1st sentence of the 2nd paragraph as follows:

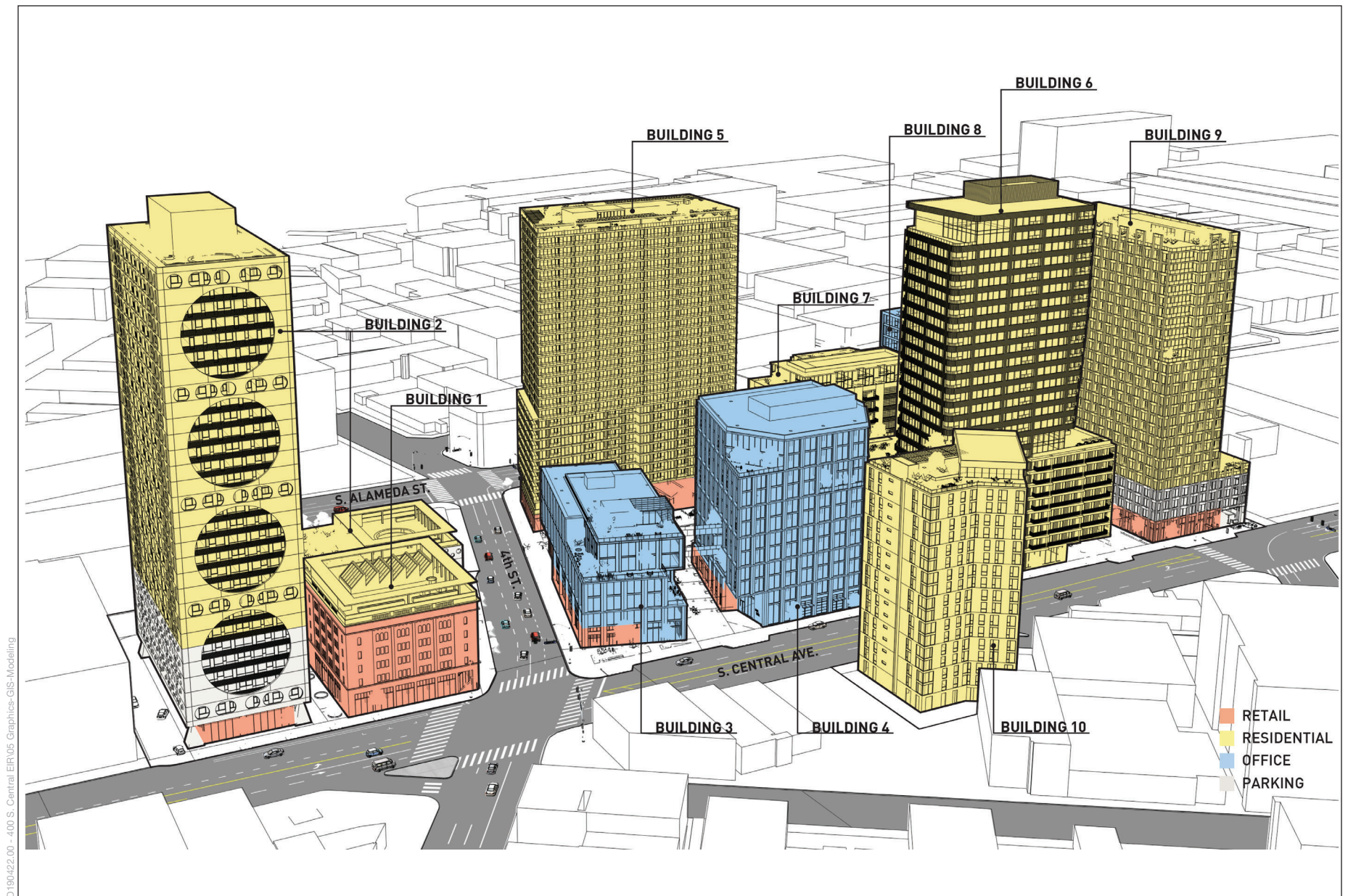
In place of the existing industrial uses and surface parking, the Project would develop a mix of residential, ~~hotel~~, retail/commercial, office, and community uses within 10 distinct buildings on the North, South and West Sites.

7. Page II-13, Subsection 4.a)(1), *Project Overview*, revise the last sentence of the 3rd paragraph as follows:

Figure II-9, *Ground Level Uses*, shows the breakdown between retail (including restaurant), residential, and office, ~~and hotel~~ uses occurring at the first-floor level.

8. Pages II-14 to II-18, Subsection 4.a)(1), *Project Overview*, revise the following figures: Figure II-5, *Proposed Program Diagram*; Figure II-6, *Conceptual Site Plan*; Figure II-7, *Ground Level Plan*; Figure II-8, *Site Dimensions and Building Heights*, and Figure II-9, *Ground Level Uses*.

See revised Figures II-5 to II-9 on the following pages.



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SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-5
Proposed Program Diagram



SOURCE: Studio One Eleven, 2024

Fourth & Central Project

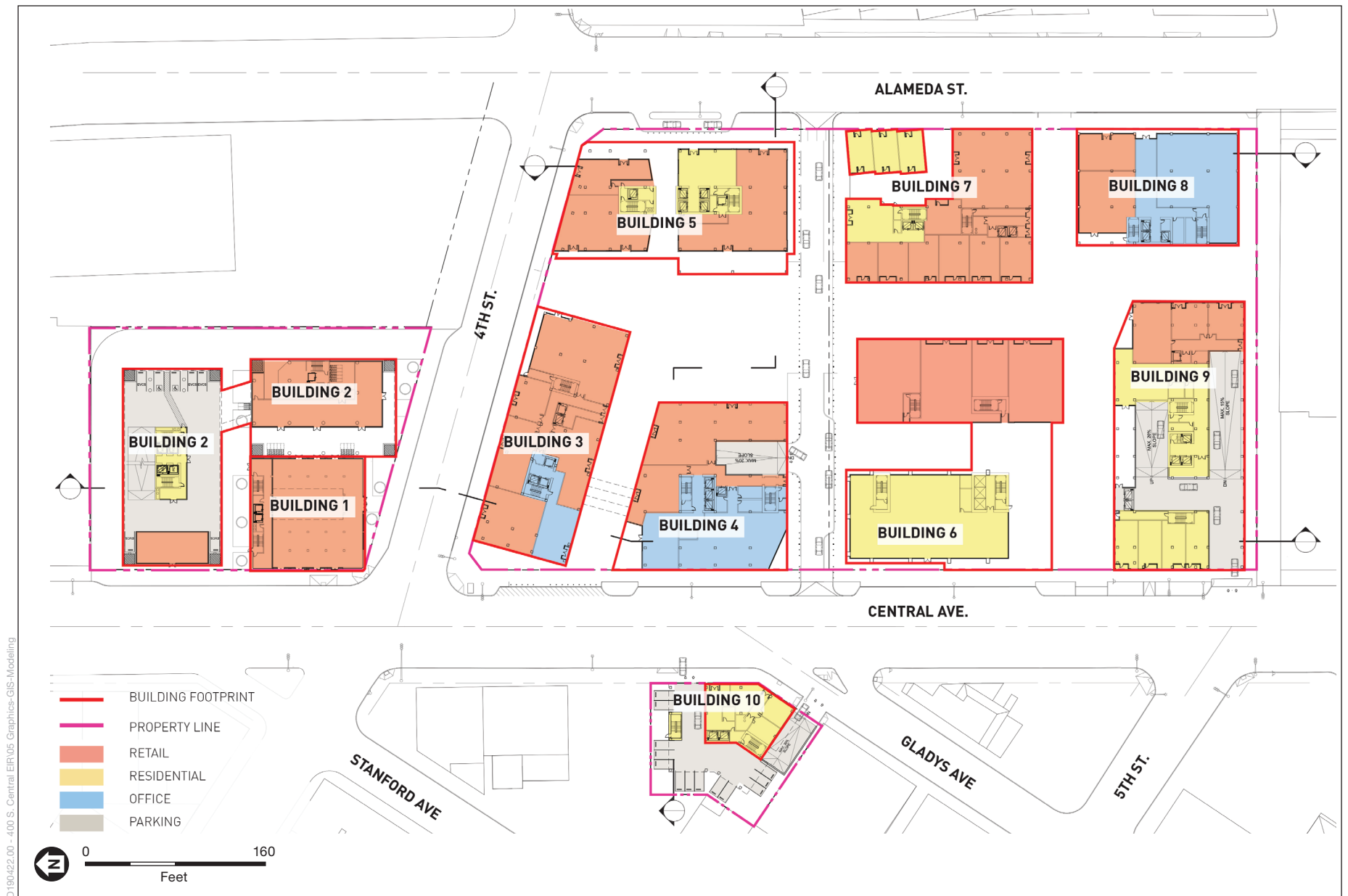
Figure II-6
Conceptual Site Plan



SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-7
Ground Level Plan



SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-9
Ground Level Uses

9. Page II-19, Subsection 4.a)(1), Project Overview, revise Table II-2, Building Stories, Heights, and Uses, as follows:

**TABLE II-2
BUILDING STORIES, HEIGHTS AND USES**

Project Building #	Stories ^{a,b}	Building Height to the top of the Parapet	Uses
Building 1	6	~~74-88~~ feet	Restaurant/Retail, ~~Residential Amenities~~
Building 2	~~44-30~~ ^c	~~497-364~~ feet	Residential, Restaurant/Retail
Building 3	7	93 feet	Restaurant/Retail, Offices
Building 4	12	168 feet	Restaurant/Retail, Offices
Building 5	28	292 feet	Residential, Restaurant/Retail
Building 6	~~6-26~~	~~96-335~~ feet	Residential, Restaurant/Retail, ~~Hotel~~
Building 7	10 ^d	124 feet	Residential, Retail
Building 8	12	156 feet	Offices, Retail
Building 9	27 ^e	284 feet	Residential, Retail
Building 10	18	181 feet	Residential

^a Stories include rooftop floors that include indoor structures (i.e., amenity rooms).

^b The number of stories does not include subterranean parking levels.

^c Building 2 includes six (6) levels of podium parking.

^d There is a detached trio of two-story industrial sheds adjacent to Alameda Street, which are accounted for as part of Building 7.

^e Building 9 includes four (4) levels of podium parking.

SOURCE: Studio One Eleven, February 2022. Updated in May 2024.

10. Page II-19, Subsection 4.a)(1), *Project Overview*, revise the 1st and 2nd sentences of the last paragraph as follows:

The Project would provide ~~1,524~~ 1,589 residential units totaling ~~1,731,849~~ 1,761,673 sf, 411,113 sf of office uses, ~~401,088~~ 145,748 sf of restaurant/retail uses for purposes of calculating FAR per LAMC requirements,³ and ~~68 hotel rooms totaling 74,484 sf.~~ The Project is requesting a General Plan Amendment to change the Project Site's land use designation from Light Industrial to Regional Commercial, and a corresponding Vesting Zone and Height District Change from M2-2D and M2-2D-O to ~~C2-2~~ C2-3D.

³ The ~~401,088~~ 145,748 square feet of restaurant/retail floor area includes floor area for purposes of calculating floor area per LAMC requirements. An additional potential 12,477 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, *Environmental Impact Analysis*, of this Draft EIR, evaluates a total of ~~413,565~~ 158,225 square feet of restaurant/retail uses. It is assumed there would be ~~45,266~~ 67,595 square feet of retail uses and ~~68,299~~ 90,630 square feet of restaurant uses (indoor and outdoor combined).

11. Page II-20, Subsection 4.a)(1), *Project Overview*, revise the 1st paragraph as follows:

The proposed buildings would range in height from two stories to ~~44~~30 stories, with a maximum height of ~~497~~364 feet to the top of the parapet. The Project would provide ~~2,475~~2,444 parking spaces, a majority of which will be provided within subterranean parking levels. Buildings 2 and 9 would also include fully enclosed and mechanically ventilated above-grade podium parking levels. The Project would also include ~~446~~163 short-term bicycle parking spaces and ~~596~~629 long-term bicycle parking spaces that would be distributed throughout the Project Site.

12. Page II-20, Subsection 4.a)(1), *Project Overview*, Subsection (a), *North Site – Buildings 1 and 2*, revise the 1st sentence of the 1st paragraph as follows:

The North Site would include the development of two buildings (Buildings 1 and 2) providing ~~723,643~~473,954 sf of residential and restaurant/retail floor area. Of this total, ~~694,571~~400,222 sf would be residential floor area and ~~29,072~~73,732 sf would be restaurant/retail floor area.

13. Page II-20, Subsection 4.a)(1)(a), *North Site – Buildings 1 and 2*, revise the 1st sentence of the 2nd paragraph as follows:

The Project will, if feasible, adaptively reuse a portion of the existing six-story cold storage building at 715 E. 4th Street as part of Building 1 to provide new restaurant/retail uses ~~and residential amenities~~.

14. Page II-20, Subsection 4.a)(1)(a), *North Site – Buildings 1 and 2*, revise the 3rd paragraph as follows:

Building 1 would consist of 61,038 sf of floor area, with a height of ~~74~~88 feet. Building 1 would include ~~46,378~~61,038 sf of restaurant/retail floor area within ~~two all~~ floors, ~~the first level and including~~ the subterranean P1 level (no new excavation below Building 1 would be required by the Project). Design of Building 1 includes a new elevated rooftop cornice similar to Building 2's. Levels 2 through 6 of Building 1 would comprise ~~44,660 sf of residential amenities to serve the adjacent residential tower (Building 2)~~44,550 sf of retail/commercial spaces. ~~At each residential amenity story, Building 1 on its north side would be connected by bridges to Building 2. Uses include leasing offices and residential amenities such as workout rooms and other common use areas such as conference rooms, activity areas and clubhouse spaces. A new rooftop for Building 1 would serve as an open terrace providing flexible event space for seating, hardscape, landscape areas, and a pool. The east side of Building 1 would abut Building 2 but would not be connected to Building 2 in this location.~~

15. Page II-20, Subsection 4.a)(1)(a), *North Site – Buildings 1 and 2*, revise Figure II-10, *Publicly-Accessible Open Space Plan*.

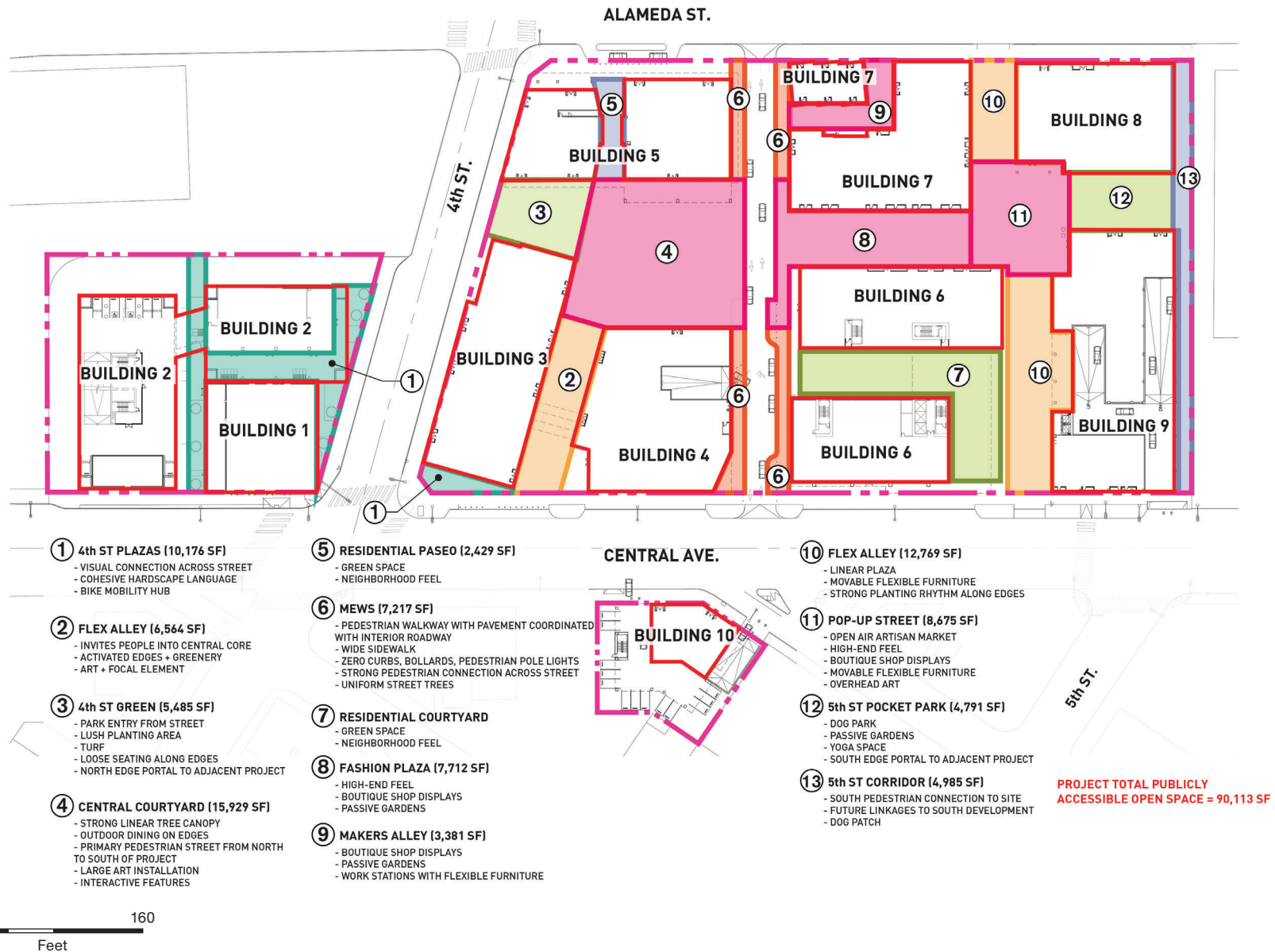
See revised Figure II-10 on the following page.

16. Page II-22, Subsection 4.a)(1)(a), *North Site – Buildings 1 and 2*, revise the 1st three paragraphs as follows:

Building 2 would be up to ~~44~~ 30 stories and would reach a maximum height of ~~497~~ approximately 364 feet to the top of the parapet. The six-story portion of Building 2 would be located immediately adjacent to the east side of Building 1. There would be vehicular drive connections on Levels 2–6 of Building 2 connecting the structured parking in the to ~~44~~ 30-story portion of Building 2 and the lower six-story portion of Building 2. There would be retail uses on the ground level of the six-story portion of Building 2. Overall, Building 2 would comprise a total of ~~662,605~~ 412,916 sf, with the ground level providing 12,694 sf of restaurant/retail floor area.

As explained further below, Levels 1 through 6 in the ~~44~~ 30-story portion of Building 2 would include structured parking, which are not included in the building floor area. However, Level 1 would also include retail and or restaurant uses along Central Avenue, and Levels 2–6 would include residential units along Central Avenue. ~~Located in front of the interior parking structure, these commercial and residential uses would screen views into Building 1's interior parking structure from Central Avenue.~~ The upper floors (Levels 7 through ~~33~~ 30) would consist exclusively of residential units. Building 2 would provide ~~449~~ 335 residential units, with a total residential floor area of ~~649,911~~ 400,222 sf. The residential units would range in size from approximately ~~625~~ 504 sf to ~~1,934~~ 966 sf. The proposed mix of residential units would include ~~74~~ 95 studio units, ~~222~~ 192 one-bedroom units, ~~111~~ 48 two-bedroom units, and ~~42~~ three three-bedroom units. ~~Level 44~~ The Rooftop deck would provide common outdoor open space and indoor amenity space for residential use.

Structured parking would be provided in Levels 1 through 6 in Building 2 and in four subterranean levels below Building 2 to accommodate ~~737~~ 706 vehicle parking spaces, ~~26~~ 37 short-term bicycle parking spaces, and ~~147~~ 126 long term bicycle parking spaces. Building 2 would provide rooftop amenities including a water feature/pool, landscaping, and hardscape/deck areas, shown above in Figure II-6.



SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-10
Publicly-Accessible Open Space Plan

17. Page II-22, Subsection 4.a)(1)(b), *South Site – Buildings 3 through 9*, revise the 1st paragraph as follows:

The South Site would include the development of seven buildings (Buildings 3 through 9), with a total residential floor area of ~~945,574~~ 1,239,747 sf, 411,113 sf of office floor area, and 72,016 sf of restaurant/retail floor area, ~~and 74,484 sf of hotel floor area~~. The South Site would provide a total of ~~928~~ 1,110 residential units, ~~as well as 68 hotel guest rooms~~. In addition, as illustrated in Figure II-10, the South Site would provide 83,805 sf of publicly-accessible open space on the ground level including several plazas, as well as paseos that would connect Central Avenue to Alameda Street.

18. Page II-23, Subsection 4.a)(1)(b), *South Site – Buildings 3 through 9*, revise the 2nd paragraph as follows:

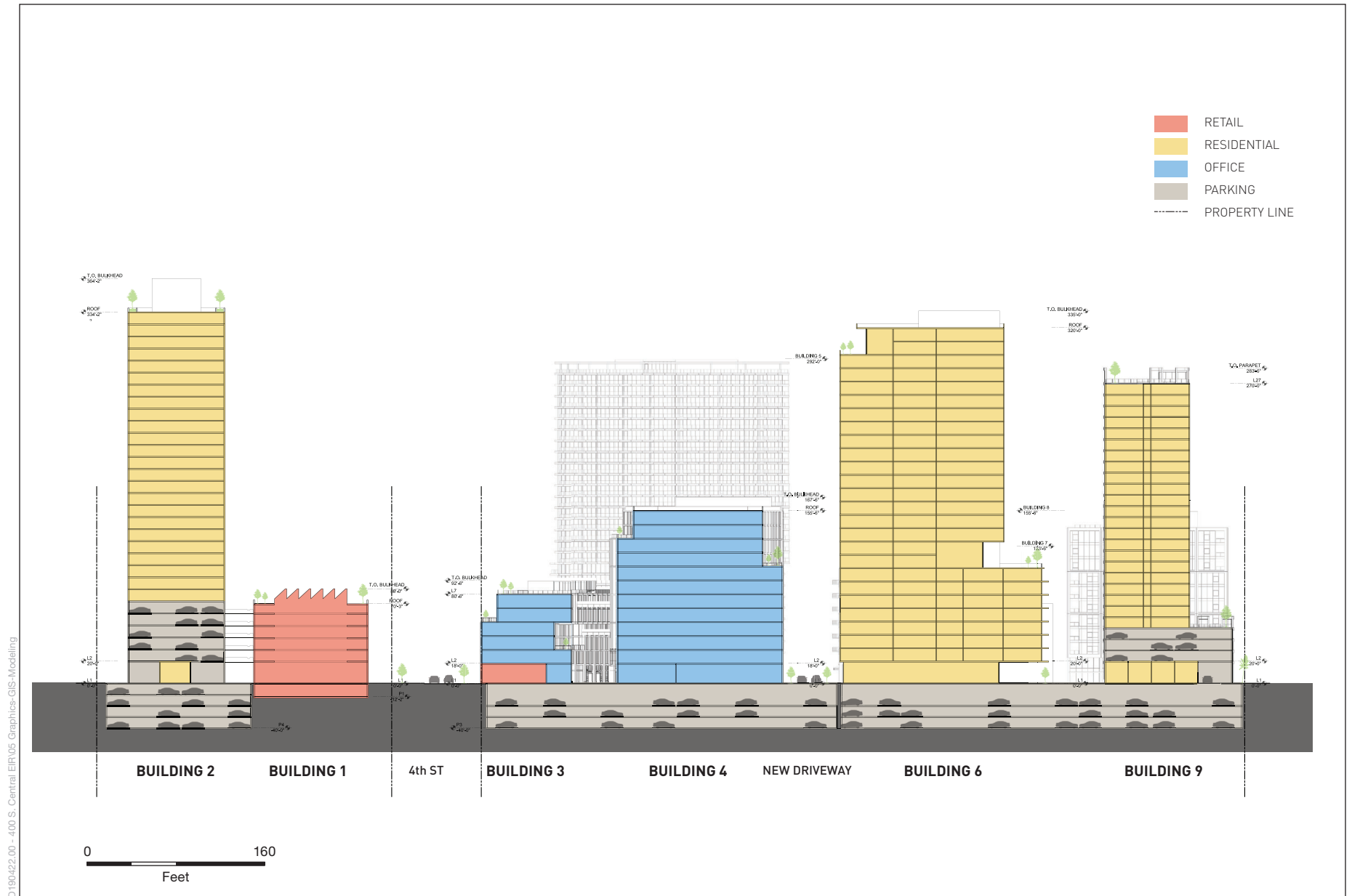
Building 6 would be developed as a ~~six-story~~ 26-story, ~~178,279~~ 427,968 sf combined residential ~~and hotel~~ building that would include 15,567 sf of restaurant/retail floor area. ~~A small portion of the hotel back of house would be located on the P1 level.~~ The building would include ~~68~~ 250 residential units (approximately ~~969~~ sf each 1,225 sf in average) on floors two through ~~26~~ five and ~~68~~ hotel rooms (approximately ~~616~~ sf each) ~~also on floors two through five~~. Residential amenities would be provided on Levels 1, 6, 9, and 25. The residential units would include ~~to 44~~ 145 one-bedroom units, ~~and 24 two-bedroom units~~ 48 two-bedroom units, and 57 three-bedroom units. The building would provide a total of ~~88,228~~ 412,401 sf of residential floor area ~~and 74,484 sf of hotel floor area~~. Building 6 would reach a maximum height to the parapet of approximately ~~96~~ 335 feet.

19. Page II-23, Subsection 4.a)(1)(b), *South Site – Buildings 3 through 9*, revise the last sentence of the last paragraph as follows:

Within the South Site, there would be three levels of subterranean parking with additional structured parking on Levels 2, 3, and 4, and a portion of Level 1 of Building 9. The subterranean and podium levels would provide a total of 1,713 vehicle parking spaces, ~~449~~ 460 long-term bicycle parking spaces, and ~~420~~ 122 short-term bicycle parking spaces.

20. Pages II-25 to II-27, Subsection 4.a)(2), *Architecture and Design*, revise the following figures: Figure II-11, *Project Site Section from Central Avenue*; Figure II-12, *Project Site Section from Alameda Street*; and, Figure II-13, *Project Site Section as Viewed from the South*.

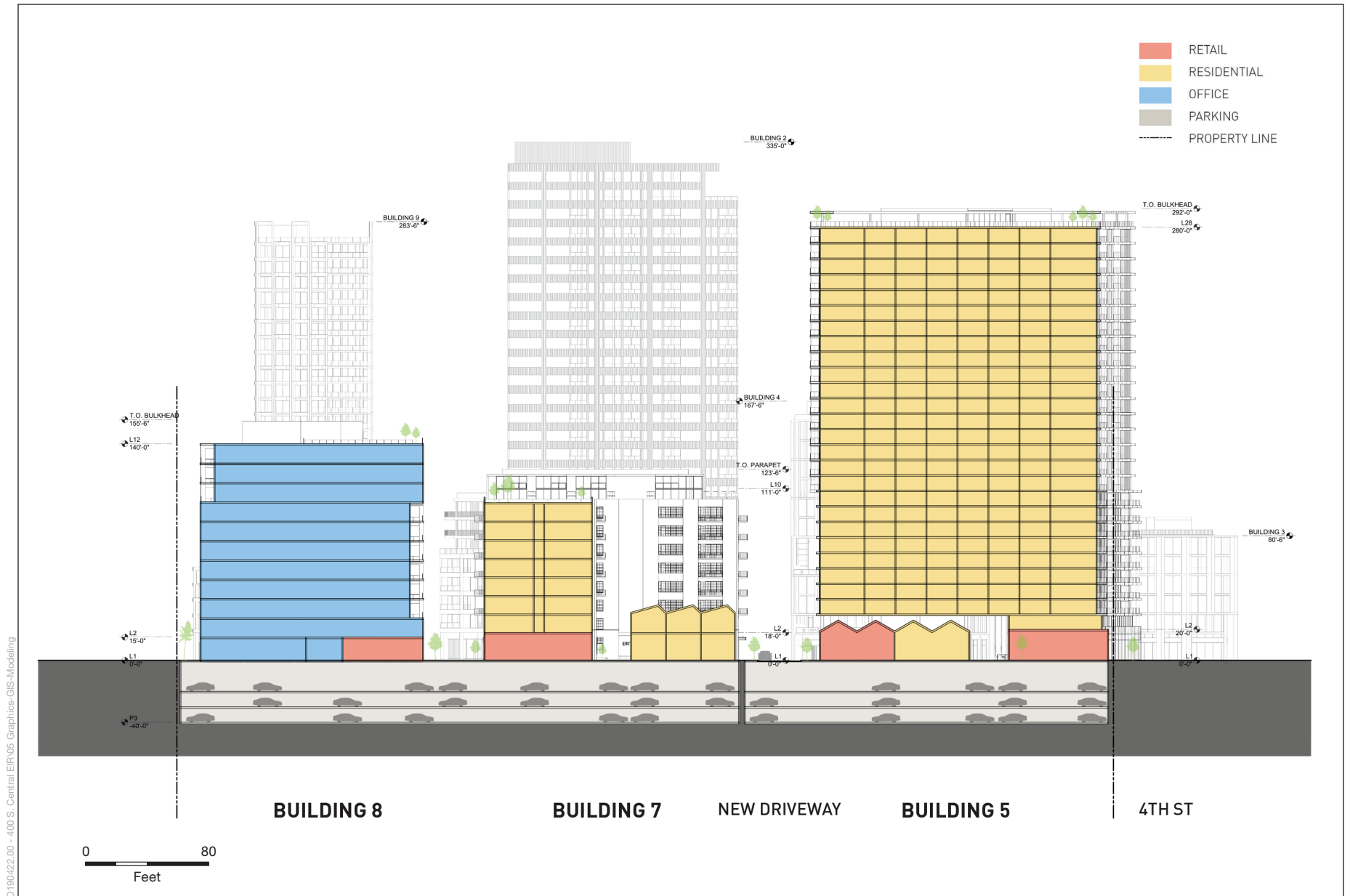
See revised Figures II-11 to II-13 on the following pages.



SOURCE: Studio One Eleven, 2024

Fourth & Central Project

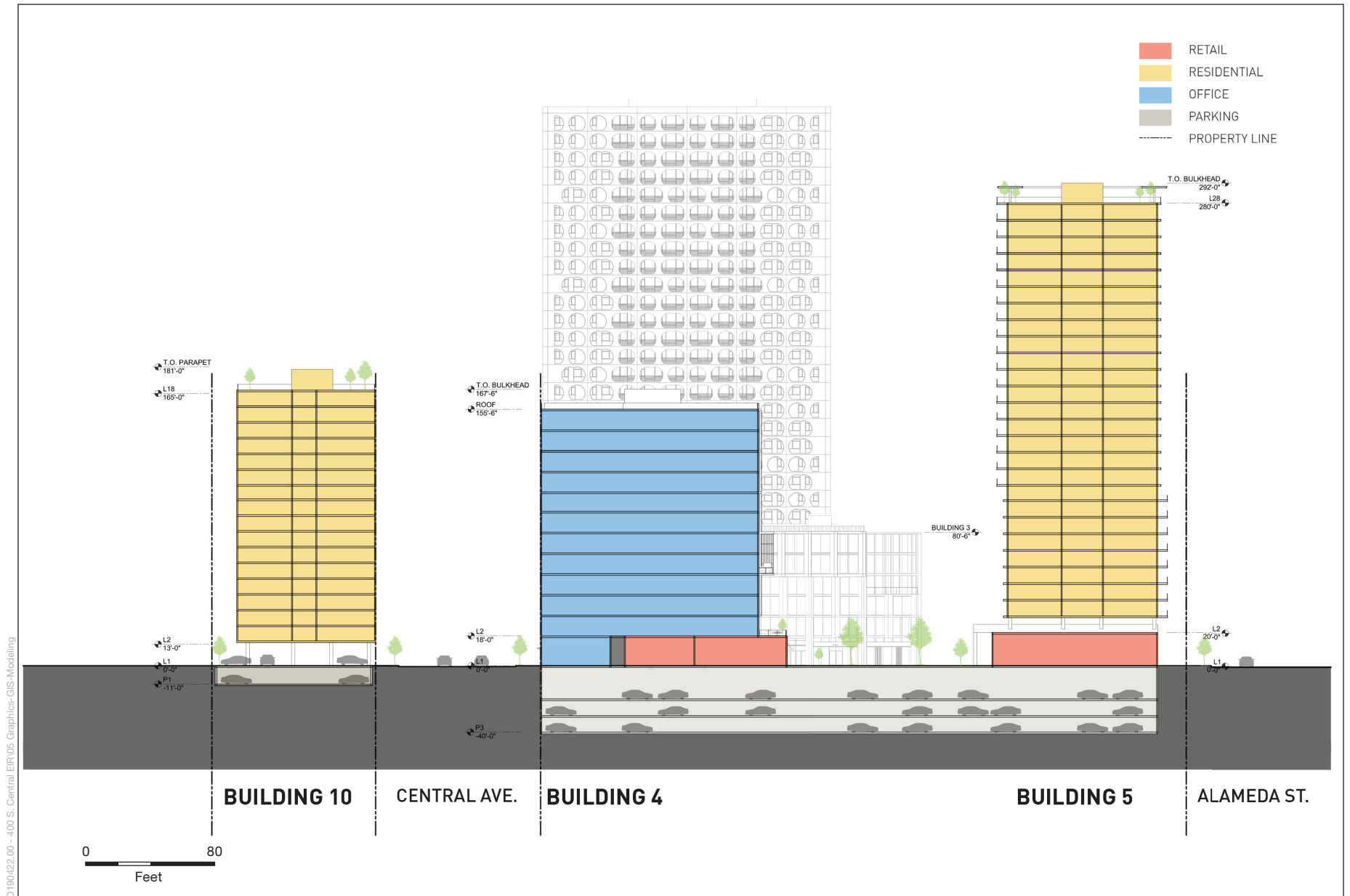
Figure II-11
Project Site Section from Central Avenue



SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-12
Project Site Section from Alameda Street



Fourth & Central Project

Figure II-13
Project Site Section as Viewed from the South

21. Page II-28, Subsection 4.a)(2), *Architecture and Design*, revise the last paragraph as follows:

Building 2 (up to ~~44~~30 stories) would be the tallest building on the Project Site and located in the northernmost portion of the Project Site, to continue the Central Los Angeles high-rise development pattern and put the highest density closest to the forthcoming Metro Little Tokyo/Arts District Regional Connector station. The ~~to 44~~30-story tower portion of Building 2 would be wrapped in a bush hammered purple concrete shell, with ~~six~~ four large punched circular openings (each spanning six stories in height) positioned vertically up the building on its east and west façades, and surrounded by smaller human-scaled openings for individual units that cover the north and south façades. The tower has a third more solid façade design at its base, with even smaller circular punched openings, shrouding the parking podium on the north, east, and south. The shell's larger openings would offer views toward the Financial District to the west, and mountains to the north and east from recessed balconies that span the two ends of the building. ~~The concrete shell would also extend past the roof, with a scalloped top, protecting the landscaped rooftop amenity.~~ The lower six-story portion of Building 2, consisting of retail use on the ground level and structured parking on Levels 2-6, would also be wrapped in a bush hammered purple concrete shell, with small circular punched openings on the parking levels to provide screening for parking uses.

22. Pages II-29 to II-34, Subsection 4.a)(2), *Architecture and Design*, revise the following figures: Figure II-14, *Conceptual Aerial View Toward Downtown Los Angeles*; Figure II-15, *View of Central Avenue at 4th Street*; Figure II-16, *View of Central Courtyard*; Figure II 17, *North Site Exterior Building Materials – Viewed from Central Avenue*; Figure II-18, *South Site Exterior Building Materials – Viewed from Central Avenue*, and Figure II-19, *South Site Exterior Building Materials – Viewed from Alameda Street*.

See revised Figures II-14 to II-19 on the following pages.

23. Page II-36, Subsection 4.a)(2), *Architecture and Design*, delete and replace the 3rd paragraph as follows:

~~Building 6 (six stories), which includes the Project's hotel, would be designed as a modern interpretation of an industrial warehouse that introduces plantings and antique brass elements to soften the industrial materiality. The building would be surrounded by marbleized concrete pillars that decrease in width as they ascend past the roof, and are positioned outside of the individual unit gardens on every level. The units would also feature copper chainmail curtains behind the landscaping, introducing an additional warmer material. The layered façade would conceal the landscaped courtyard at the buildings center. Finally, the building would feature a large landscaped rooftop deck with a light roof canopy fabric that is visible from all elevations.~~



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SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-14
Conceptual Aerial View Toward Downtown Los Angeles



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SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-15
View of Central Avenue at 4th Street



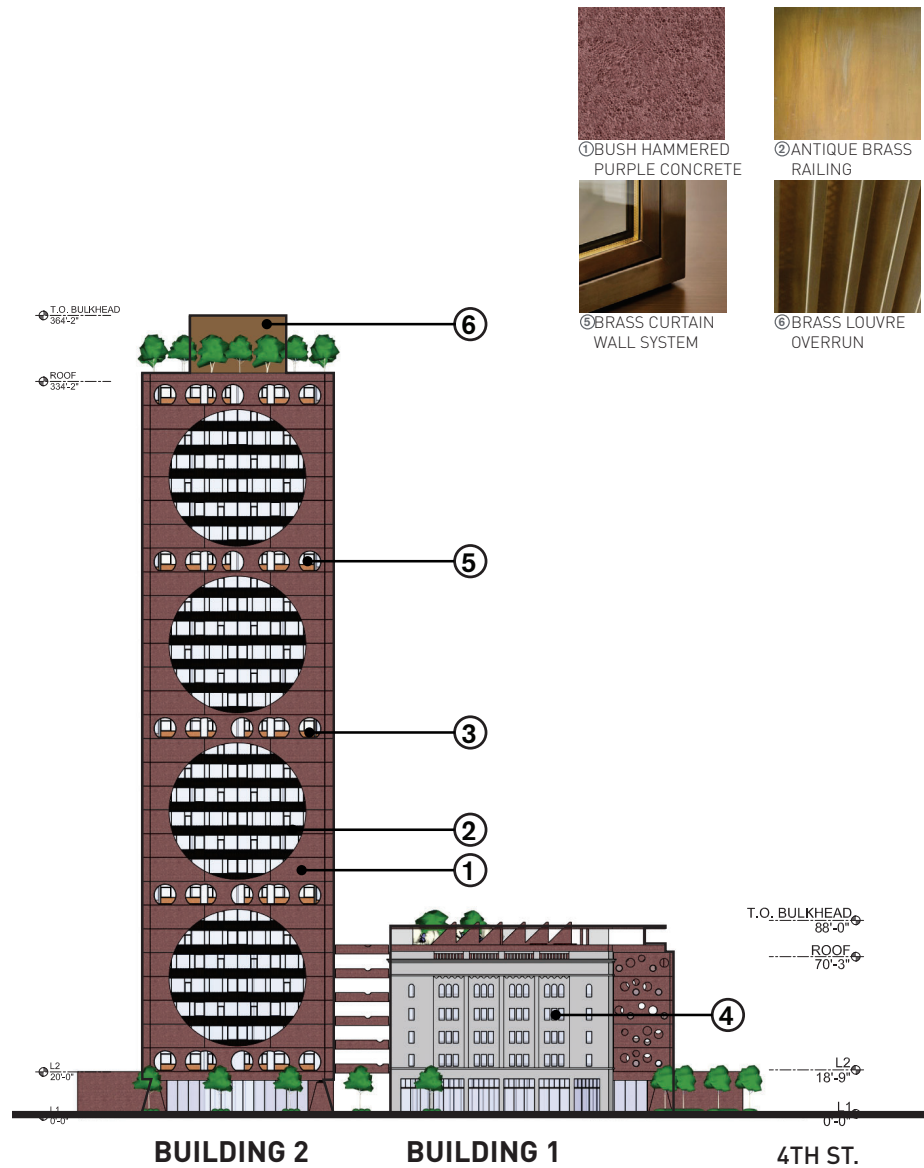
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SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-16
View of Central Courtyard

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SOURCE: Studio One Eleven, 2024

Fourth & Central Project

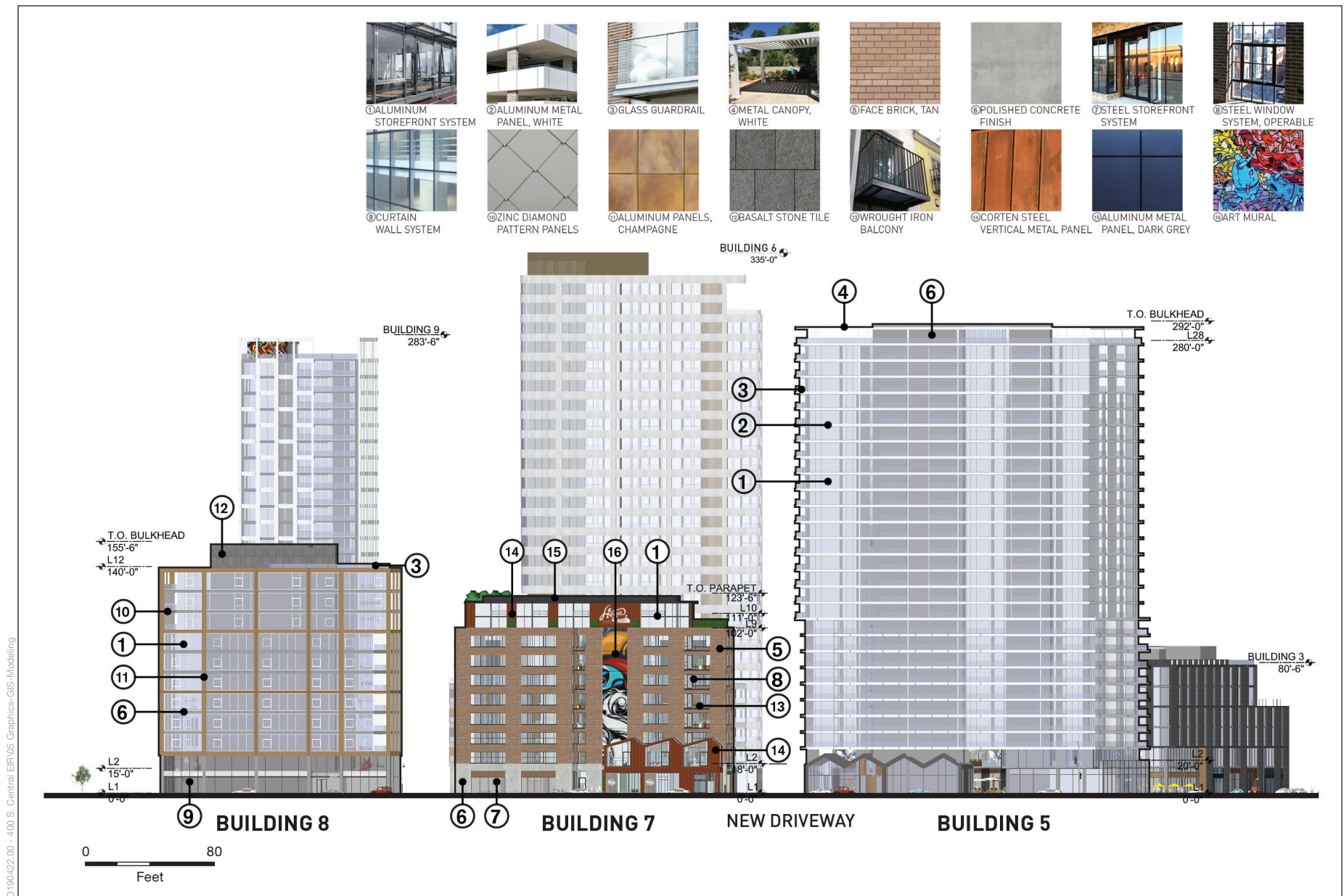
Figure II-17
North Site Exterior Building Materials – Viewed from Central Avenue



SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-18
South Site Exterior Building Materials – Viewed from Central Avenue



SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-19
South Site Exterior Building Materials – Viewed from Alameda Street

Building 6 (26 stories) would be a residential building featuring a unique massing divided into three distinct bars, creating a visual rhythm that steps down to the central courtyard, fostering a sense of continuity within the overall Project. Its façade combines metal panels, stone, and exposed concrete, all in a neutral color palette, complemented by glass storefronts. The tallest bar would offer panoramic views of downtown Los Angeles, while the two lower bars would have landscaped rooftop amenity spaces. Retail spaces would activate the ground level for both residents and visitors.

24. Page II-38, Subsection 4.a)(3), *Landscaping and Open Space*, remove the “Note” from the bottom of Table II-3, Publicly-Accessible Open Space Program Summary, as follows:

~~NOTE: Open Space Location 7 on Figure II-10 is private open space associated with the hotel courtyard and is therefore, not included as publicly-accessible open space or included in this table.~~

SOURCE: Studio One Eleven, 2022, with locations corresponding to Figure II-10 of this Draft EIR.

25. Page II-40, Subsection 4.a)(3), *Landscaping and Open Space*, revise the 1st three paragraphs as follows:

The South Site would also feature a large courtyard within Building 6 (residential and hotel building). However, this space would be for private use for Building 6’s residents and hotel guests and is not included as publicly-accessible open space. No publicly-accessible open space would be provided on the West Site

The Project’s residential open space and amenity features would include rooftop terraces, community gardens, swimming pools, spa areas, common areas with BBQs, kitchen spaces and outdoor seating, meditation and quiet areas, game rooms, a dog walk, plazas, and parks. Private and common open space as required by the LAMC for use by the Project’s residents is summarized in **Table II-4, Open Space, Trees and Landscape Summary**. The residential uses would require a total of ~~163,325~~ 170,275 sf of open space (including private and common open space) and would provide ~~163,325~~ 170,275 sf of usable open space. Of this, ~~105,218~~ 94,547 sf would be outdoor and rooftop common open space, approximately 25 percent of which is required to be landscaped. The Project would provide a minimum of ~~26,305~~ 23,637 sf of landscaped open space (25 percent), thus meeting the LAMC requirement.

The residential uses would generate a requirement of ~~382~~ 399 trees to be provided within the Project Site. In addition, the existing 20 street trees to be removed during Project construction would be required to be replaced at a 2:1 ratio for a total of 40 replacement trees. Overall, the total tree planting for the Project would require ~~422~~ 439 new trees which the Project would provide. Tree placement is illustrated in **Figure II-21, Overall Tree Planting Plan**.

26. Page II-41, Subsection 4.a)(3), *Landscaping and Open Space*, Table II-4, *Open Space, Trees and Landscape Summary*, revise the open space and landscaping description for Building 2 as follows:

Buildings with Residential Uses	Code-Required Open Space ^a	Required Trees ^b	Open Space Provided ^c	Landscape Provided	Trees Provided
Building 2	~~50,825 sf~~ (74 studio, 222 1-BR, 111 2-BR, 42 11-BR) <u>34,700 sf</u> (95 studio, 192 1-BR, 48 2-BR)	~~113~~ <u>84</u>	~~Common Outdoor (Level 1): 5,183 sf~~ - Common Outdoor (Rooftop Level 7 of Building 1 & 2): ~~18,595~~ <u>11,350</u> sf - Common Outdoor (Rooftop Level 44-31 of Building 2): ~~13,730~~ <u>7,650</u> sf ~~Recreation Room (Level 6 of Building 1): 5,257 sf (Max. 25% of required open space)~~ - Residential Lobby (Level 1 and 44 of Building 2): ~~1,078~~ <u>948</u> sf (Max. 25% of required open space) ~~Recreation Room (Level 44 of Building 2): 2,307 sf (Max. 25% of required open space)~~ - Private Open Space (Balconies): ~~4,675~~ <u>14,752</u> sf (Max. 50 sf/unit)	~~8,111 sf~~ <u>4,975 sf</u>	~~6 trees~~ <u>32 trees</u>
			Total Building 2: ~~50,825~~ <u>34,700</u> sf		

27. Page II-42, Subsection 4.a)(3), *Landscaping and Open Space*, Table II-4, *Open Space, Trees and Landscape Summary*, revise the open space and landscaping description for Building 6 as follows:

Buildings with Residential Uses	Code-Required Open Space ^a	Required Trees ^b	Open Space Provided ^c	Landscape Provided	Trees Provided
Building 6	~~7,400 sf~~ (44 1-BR, 24 2-BR) <u>30,475 sf</u> (145 1-BR, 48 2-BR, 57 3-BR)	~~47~~ <u>63</u> trees	Common Outdoor (Rooftop Level 6, 9, & 26 of Building 6): ~~7,400~~ <u>15,237</u> sf <u>Residential Lobby (Level 1 of Building 6): 1,300 sf</u> <u>Recreation Room (Level 1, 6, 9, & 25): 6,319 sf</u> <u>Private Open Space (Balconies): 7,619 sf (Max. 50 sf/unit)</u>	~~4,962 sf~~ <u>5,430 sf</u>	~~73~~ <u>64</u> trees
			Total Building 6: ~~7,400~~ <u>30,475</u> sf		

28. Page II-43, Subsection 4.a)(3), *Landscaping and Open Space*, Table II-4, *Open Space, Trees and Landscape Summary*, revise the last four (4) rows showing the Project's open space and tree totals as follows:

Buildings with Residential Uses	Code-Required Open Space ^a	Required Trees ^b	Open Space Provided ^c	Landscape Provided	Trees Provided
Total Residential Open Space	~~463,325~~ <u>170,275</u> sf		Common Outdoor: ~~405,248~~ <u>94,547</u> sf Recreation Rooms (Indoor Amenity Spaces): ~~25,838~~ sf (16%) <u>25,763</u> sf (15%)^d Private Open Space (Balconies): ~~32,269~~ sf (20%) <u>49,965</u> sf (29%) Total Provided Residential Open Space: ~~463,325~~ <u>170,275</u> sf	~~26,305~~ <u>23,637</u> sf (25% min. landscape required per LAMC)	
Other Trees throughout Project Site					93 trees
<i>Subtotal Trees</i>					~~382~~ <u>399</u> trees
Replacement of Removed Street Trees		20 trees at 2:1 replacement = 40			40 trees
Total Trees Required for Project Site		~~422~~ <u>439</u> trees			~~422~~ <u>439</u> trees provided

^a LAMC Section 12.21 G requires the following usable open space per dwelling unit: 100 sf for each unit having less than three habitable rooms; 125 sf for each unit having three habitable rooms; and 175 sf for each unit having more than three habitable rooms. For the Project, Studio and 1-bedroom units would require 100 sf of open space, 2-bedroom units would require 125 sf of open space and 11-bedroom units would require 175 sf of open space.

^b The Project is required to provide one tree for every four dwelling units, pursuant to LAMC Section 12.21 G.

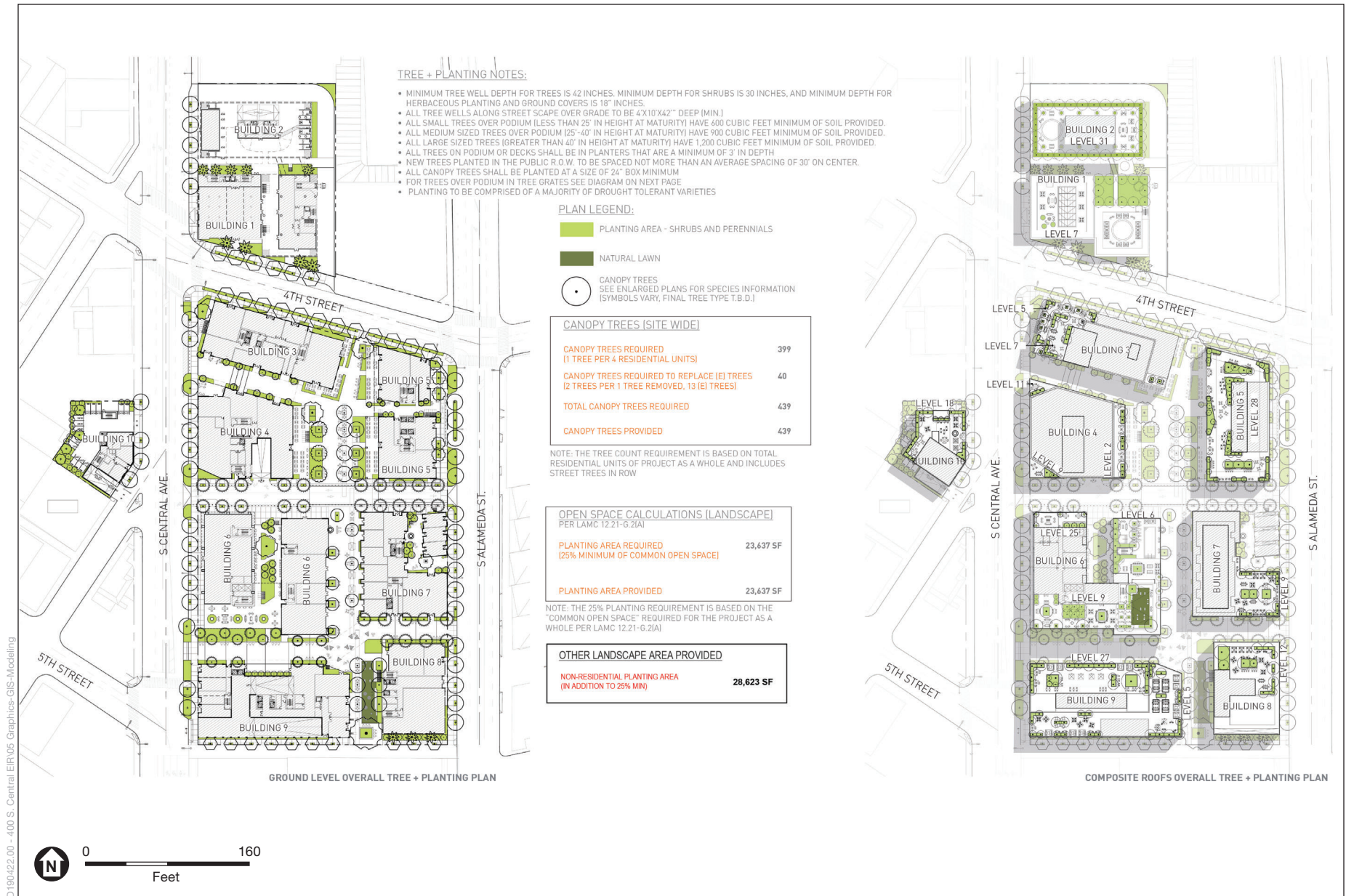
^c Open space may include private residential open space, such as balconies; common open space such as swimming pools and spas; and common open space that is accessible to the public.

^d Recreation rooms cannot count for more than 25 percent of the required common open space per LAMC Section 12.21 G 2(a)(4)(i).

SOURCE: Studio One Eleven, February 2022. Updated in May 2024.

29. Page II-45, Subsection 4.a)(3), *Landscaping and Open Space*, revised Figure II-21, *Overall Tree Planting Plan*.

See revised Figure II-21 on the following page.



SOURCE: Studio One Eleven, 2024

Fourth & Central Project

Figure II-21
Overall Tree Planting Plan

30. Page II-47, Subsection 4.a)(c), *Vehicle Parking*, revise the last 2 paragraphs as follows:

The Project Site is located within the Los Angeles State Enterprise Zone, which permits general commercial uses to provide two (2) parking spaces per 1,000 sf of gross commercial floor area. (LAMC Section 12.21 A.4(x)) The Project Site is also part of the Central City Parking District, which governs the Project's residential ~~and hotel~~ parking requirements. (LAMC Section 12.21 A.4(p)) The parking requirement for residential projects in the Central City Parking District is one space for each dwelling unit with three or fewer habitable rooms and 1.25 spaces for units with more than three habitable rooms. (LAMC Section 12.21 A.4(p)) ~~Parking requirements for hotels within the Central City Parking District are as follows: one space for each two individual guest rooms for the first 20 rooms, one additional parking space for each four guest rooms in excess of 20 but not exceeding 40 rooms, and one additional parking space for each six guest rooms in excess of 40 rooms. (LAMC Section 12.21 A.4(p))~~

The Project's vehicular parking requirement (prior to design modifications) under the LAMC is ~~2,658~~ 2,789 spaces. For informational purposes, the Project prior to its design modifications ~~However, and~~ pursuant to LAMC Section 12.21 A.4, ~~the Project will proposed to~~ replace some of its required vehicular parking spaces with bicycle parking spaces, which reduced the total vehicular parking requirement to ~~2,474~~ 2,588 spaces. The Project would provide a total of approximately ~~2,475~~ 2,444 vehicle spaces and ~~742~~ 792 bicycle spaces, ~~thus, meeting LAMC parking requirements.~~ The parking calculations for the Project's various uses are provided in **Table II-5, Vehicular Parking, for informational purposes.**

Pursuant to Assembly Bill 2097 (AB 2097; California Government Code Section 65585 et seq.), the City is prohibited from imposing a minimum automobile parking requirement on most development projects located within a half-mile radius of a major transit stop. Since the Project is located within a half-mile radius of a major transit stop and has removed the proposed hotel component, the Project with design modifications is eligible for the parking exemption under AB 2097, and is therefore not required to provide any vehicular parking spaces. Nonetheless, the Project is still proposing to provide 2,444 parking spaces.

31. Page II-48, Subsection 4.a)(c), *Vehicle Parking*, revise Table II-5, *Vehicle Parking*, as follows:

**TABLE II-5
VEHICULAR PARKING^c**

Use	Rate Per LAMC	Required
Residential ^a (~~1,524~~ <u>1,589</u> units: ~~1,156~~ <u>1,248</u> du with 3 or less habitable rooms, ~~365~~ <u>341</u> du with greater than 3 habitable rooms)	1 space per unit with 3 or less habitable rooms; 1.25 space per unit with more than 3 habitable rooms	~~1,612~~ <u>1,674</u> spaces
Retail ^b (~~101,088~~ <u>145,748</u> sf)	2 spaces per 1,000 sf	~~203~~ <u>292</u> spaces
Office ^b (411,113 sf)	2 spaces per 1,000 sf	823 spaces
Hotel ^a (~~68~~ guest rooms)	First 20 rooms — 1 space per 2 guest rooms Next 20 rooms — 1 space per 4 guest rooms Remaining rooms — 1 space per 6 guest rooms	~~20~~ spaces
Total Project Requirements		~~2,658~~ <u>2,789</u> spaces
Bicycle Parking Reduction <u>Bicycle Spaces Vehicle Space Reduction</u>		
<i>Residential (8%) ~~504~~ <u>521</u> spaces (~~125~~ <u>134</u> vehicle spaces <u>reduction</u>)</i>		
<i>Hotel (15%) ~~12~~ spaces (~~3~~ spaces)</i>		
<i>Non-Residential (5% ~~6%~~) ~~224~~ <u>271</u> spaces (~~56~~ <u>67</u> vehicle spaces <u>reduction</u>)</i>		
Total Project Requirement with Bicycle Parking Reduction		~~2,474~~ <u>2,588</u> spaces
Total Parking Spaces provided by Project		~~2,475~~ <u>2,444</u> spaces

^a Parking rates per LAMC Section 12.21 A.4(p) for residential and hotel uses within Central City Parking District.

^b Parking rates per LAMC Section 12.21 A.4(x)(3) for commercial uses within a State Enterprise Zone.

^c This table includes parking requirements based on LAMC requirements for informational purposes. Because the Project is located within a half-mile radius of a major transit stop and has removed the proposed hotel component, the Project with design modifications is eligible for the parking exemption under AB 2097, and is therefore not required to provide any vehicular parking spaces.

SOURCE: Studio One Eleven, 2022. Updated in May 2024.

32. Page II-48, Subsection 4.a)(c), *Vehicle Parking*, revise the 2nd paragraph as follows:

The Project will include ~~742~~ 792 bicycle parking spaces (~~146~~ 163 short-term and ~~596~~ 629 long-term spaces), as required by LAMC Section 12.21 A.16(a)(2). The Project's bicycle parking spaces and facilities will be provided at various locations throughout the Project Site, which include lockers, fix-it/repair stations and showers.

33. Page II-53, Subsection 4.b), *Requested Permits and Approvals*, revise the 2nd bullet point on the page as follows:

- Pursuant to LAMC Sections 12.32 F and 12.32 Q, a **Vesting Zone Change and Height District Change** to change the zone from M2-2D/M2-2D-O to ~~C2-2~~ C2-3D; and

34. Page II-53, Subsection 4.b), *Requested Permits and Approvals*, remove the last bullet point on the page as follows:

- ~~Pursuant to Government Code Sections 65864 through 65869.5, a **Development Agreement** between the Developer and the City of Los Angeles for a term of 20 years; and~~

3. Chapter IV.A Air Quality

1. Page IV.A-1, Subsection 1, *Introduction*, add a sentence at the end of the paragraph as follows:

This section relies on information included in the *Air Quality and Greenhouse Gas Technical Documentation (AQ and GHG Technical Documentation)*, provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.

2. Page IV.A-29, Subsection 2.c)(2)(f), *Project Location and Surrounding Land Uses*, revise the last two sentences of the paragraph as follows:

The Project Site is located adjacent to the Arts District, which is an emerging neighborhood in the City's Downtown area and has experienced an increased demand for new retail, ~~hotel~~, creative office, and residential spaces. The Project Site is also situated just south of the Little Tokyo neighborhood and west of the Arts District, where numerous former warehouse and other manufacturing/industrial structures are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses.

3. Page IV.A-34, Subsection 3.b), *Methodology*, add a sentence at the end of the paragraph as follows:

The evaluation of potential impacts to regional and local air quality that may result from the construction and long-term operations of the Project is discussed below. Additional details are provided in the *Air Quality and Greenhouse Gas Technical Appendix* in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.

4. Page IV.A-38, Subsection 3.b)(5), *Construction Emission Methodology*, add a sentence at the end of the 1st partial paragraph as follows:

A detailed discussion of the Project's construction phasing and equipment list is available in the *Technical Appendix for Air Quality and Greenhouse Gas Emissions* for the Project, which is provided in Appendix B of this Draft EIR.⁶⁰ See Appendix C of the Final EIR for details associated with the Project with design modifications.

5. Page IV.A-40, Subsection 3.b)(6), *Operational Emissions Methodology*, revise the footnote as follows:

⁶⁴ Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of the Project's Draft EIR; see Appendix F of the Final EIR for the VMT analysis associated with the Project design modifications.

6. Page IV.A-41, Subsection 3.b)(6), *Operational Emissions Methodology*, revise the 1st sentence of the 1st full paragraph as follows:

Stationary sources would also include emergency generators with one emergency generator in Building 2 on the North Site with an estimated capacity rated at approximately ~~2,500 kilowatts (3,353 horsepower)~~ 2,000 kilowatts (2,682 horsepower), two emergency generators shared between Buildings 3, 4 and 5 on the South Site with an estimated capacity rated at approximately 1,500 kilowatts (2,012 horsepower) each, two emergency generators shared between Buildings 6, 7, 8 and 9 on the South Site, one with an estimated capacity rated at approximately 2,000 kilowatts (2,682 horsepower) and one with an estimated capacity rated at approximately 2,500 kilowatts (3,353 horsepower) each, and one emergency generator in Building 10 on the West Site with an estimated capacity rated at approximately 1,500 kilowatts (2,012 horsepower), which would provide emergency power primarily for lighting and other emergency building systems.

7. Page IV.A-42, Subsection 3.b)(6), *Operational Emission Methodology*, add a sentence at the end of the 1st full paragraph as follows:

For further explanation, please see the *Air Quality and Greenhouse Gas Emissions Technical Documentation* in Appendix B of this Draft EIR. See Appendix C and Appendix

D of the Final EIR for air quality calculations and updated energy calculations associated with operation of the Project with design modifications.

8. Page IV.A-42, Subsection 3.b)(7), *Localized Emissions*, add a sentence at the end of the 1st full paragraph as follows:

For further explanation, please see Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with operation of the Project with design modifications.

9. Page IV.A-43, Subsection 3.b)(9), *Toxic Air Contaminant Impacts (Construction and Operations)*, revise the 3rd sentence of the 1st paragraph as follows:

As further described below, the City is not required to conduct a quantified health risk assessment (HRA) for mixed-use development projects that include multi-family housing, office, retail, ~~hotel~~ and restaurant uses, such as the Project, as the applicable standards and guidance that are available are intended for evaluation of health risks associated with stationary long-term sources of TAC emissions.

10. Page IV.A-44, Subsection 3.b)(9), *Toxic Air Contaminant Impacts (Construction and Operations)*, revise the 1st two sentences of the 1st full paragraph as follows:

The Project is not a “Hot Spots” Program project but rather involves the construction and operation of a mixed-use development that includes multi-family housing, office, retail, ~~hotel~~ and restaurant uses. The OEHHA Guidance Manual applies to stationary source operations which have no applicability to mixed-use projects that consist of residential, ~~hotel~~, retail, office, and restaurant uses, such as the Project.

11. Page IV.A-45, Subsection 3.b)(9), *Toxic Air Contaminant Impacts (Construction and Operations)*, revise the 1st sentence of the 1st paragraph as follows:

To date, the SCAQMD has not conducted public workshops nor developed policies relating to the applicability of applying the Guidance Manual for projects prepared by other public/lead agencies subject to CEQA, for short-term construction emissions, or for mixed-use development projects that include multi-family housing, office, retail, ~~hotel~~ and restaurant uses, such as the Project.

12. Page IV.A-45, Subsection 3.b)(9), *Toxic Air Contaminant Impacts (Construction and Operations)*, revise the 3rd sentence of the 2nd paragraph as follows:

As the Project consists of multi-family housing, office, retail, ~~hotel~~ and restaurant uses, the Project would not include sources of substantial TAC emissions identified by the SCAQMD or CARB siting recommendations.^{72,73}

13. Page IV.A-45, Subsection 3.b)(9), *Toxic Air Contaminant Impacts (Construction and Operations)*, revise the last sentence of the 2nd paragraph as follows:

The siting of the Project itself in relation to off-site sources of TACs is addressed under land use compatibility for the surrounding area in Section IV.G, *Land Use and Planning*, of this Draft EIR.

14. Page IV.A-46, Subsection 3.d), Threshold (a)(1)(a)(i), *Criterion 1*, revise the 5th and 6th sentences of the 1st paragraph as follows:

With respect to the first criterion, as discussed in more detail under the analysis for Threshold (b) below, regional concentrations of NO₂ as NO_x, VOC, SO₂, CO, PM₁₀, and PM_{2.5} have been analyzed for the Project. As shown in Tables IV.A-7 through IV.A-11 in Threshold (b) below, regional maximum daily Project construction emissions would exceed the SCAQMD regional construction emissions thresholds for VOC, NO_x, and CO. With implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2, as shown in Tables IV.A-14 through IV.A-18, NO_x and CO for regional construction emissions would remain above SCAQMD regional construction emissions thresholds. As shown in Table IV.A-12 in Threshold (b) below, regional maximum daily Project interim operations emissions would exceed the SCAQMD regional operations emissions thresholds for NO_x. With implementation of Mitigation Measures AQ-MM-1, AQ-MM-2, AQ-MM-3, AQ-MM-4 and AQ-MM-5, as shown in Table IV.A-19, NO_x emissions would be reduced to below regional operational emissions thresholds during interim operations, ~~however CO for regional interim operations emissions would be above SCAQMD regional operations emissions thresholds. As further explained under Threshold (b), this is due to the construction activities that would overlap with the interim operations of the Project where emissions of CO from construction activities that would overlap with the interim operations of the Project would exceed the SCAQMD regional significance threshold due to the Tier 4 Final equipment and CNG truck engine technology where the technology used to reduce NO_x emissions leads to slightly higher CO emissions.~~

15. Page IV.A-51, Subsection 3.d), Threshold (a)(1)(a)(ii)(a)(ii), *Operations Growth Projections*, revise the 1st paragraph as follows:

Based on the 2016–2040 SCAG RTP/SCS growth projections, the Project's proposed ~~3,423~~ 3,576 population increase would comprise approximately 1.6 percent of SCAG's year ~~2040~~ 2030 estimated increase of 218,257 in population growth within the City and

approximately 0.7 percent of SCAG's 2040 estimated increase of 491,079 population growth within the City, relative to 2022.⁷⁹ Based on the 2016–2040 SCAG RTP/SCS growth projections, the Project's proposed ~~4,524~~ 1,589 housing units would comprise approximately ~~2.9~~ 3.0 percent of SCAG's year 2030 estimated increase of 52,114 households within the City and approximately ~~0.6~~ 0.7 percent of SCAG's 2040 estimated increase of 234,514 households within the City, relative to 2022.⁸⁰ Based on the 2016–2040 SCAG RTP/SCS growth projections, the Project would result in an increase in the number of employees on the Project Site of approximately ~~2,039~~ 2,073 net new employees, which would comprise approximately 1.5 percent of SCAG's year 2030 estimated increase of 135,057 employees within the City and approximately 0.7 percent of SCAG's 2045 estimated increase of 303,879 employees within the City.⁸¹ However, the Project would have a small effect on the overall employment projections for the City.

16. Page IV.A-51, Subsection 3.d), Threshold (a)(1)(a)(ii)(a)(ii), *Operations Growth Projections*, revise the 1st three sentences of the 2nd full paragraph and footnotes as follows:

Based on the 2020–2045 RTP/SCS growth projections, the Project's proposed ~~3,423~~ 3,576 population increase would comprise approximately 1.5 percent of SCAG's year 2030 estimated increase of 231,034 households within the City and approximately 0.5 percent of SCAG's 2045 estimated increase of 664,224 population growth within the City, relative to 2022.⁸² Based on the 2020–2045 RTP/SCS growth projections, the Project's proposed ~~4,524~~ 1,589 housing units would comprise approximately ~~4.3~~ 1.4 percent of SCAG's year 2030 estimated increase of 117,517 households within the City and approximately 0.5 percent of SCAG's 2045 estimated increase of 337,862 households within the City, relative to 2022.⁸³ Based on the 2020–2045 RTP/SCS growth projections, the Project would result in an increase in the number of employees on the Project Site of approximately ~~2,039~~ 2,073 net new employees, which would comprise approximately 2.6 percent of SCAG's year 2030 estimated increase of 79,337 employees within the City and approximately 0.9 percent of SCAG's 2045 estimated increase of 228,096 employees within the City.⁸⁴

⁸² Refer to Section IV. H, *Population and Housing*, of this Draft EIR for additional information. Refer to the revisions presented for Section IV. H, *Population and Housing*, in this Section III of the Final EIR for additional information regarding Project design modifications.

⁸³ Refer to Section IV.H, *Population and Housing*, of this Draft EIR for additional information. Refer to the revisions presented for Section IV. H, *Population and Housing*, in this Section III of the Final EIR for additional information regarding Project design modifications.

⁸⁴ Refer to Section IV.H, *Population and Housing*, of this Draft EIR for additional information. Refer to the revisions presented for Section IV. H, *Population and Housing*, in this Section III of the Final EIR for additional information regarding Project design modifications.

17. Page IV.A-53, Subsection 3.d), Threshold (a)(1)(a)(ii)(b)(ii), *Operations*, revise the 1st sentence of the 2nd paragraph as follows:

The Project's location, design, and land uses would support transportation control strategies related to reducing vehicle trips for residents, patrons and employees by increasing residential, ~~hotel~~, office, retail, and restaurant density near public transit.

18. Page IV.A-54, Subsection 3.d), Threshold (a)(1)(a)(ii)(b)(ii), *Operations*, revise the last sentence of the 1st full paragraph as follows:

As described above, by locating its residential, ~~hotel~~, office, retail, and restaurant uses within an area that has existing high quality public transit (with access to existing local and regional bus service), employment opportunities, restaurants, and entertainment, all within walking distance, and by including features that support and encourage pedestrian activity and other non-vehicular transportation and increased transit use in the Central City Community Plan area of the City, the Project would reduce vehicle trips and VMT, and the corresponding reduction in air pollutant emissions.

19. Page IV.A-54, Subsection 3.d), Threshold (a)(1)(a)(ii)(b)(ii), *Operations*, revise the footnote as follows:

⁸⁷ Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of the Project's Draft EIR; see Appendix F of the Final EIR for the VMT analysis associated with the Project design modifications.

20. Page IV.A-55, Subsection 3.d), Threshold (a)(1)(b), *General Plan Air Quality Element*, revise 2nd sentence of the 1st paragraph as follows:

As such, the Project would reduce vehicle trips and air pollutant emissions generated by the proposed development by locating residential, ~~hotel~~, office, retail, and restaurant land uses within an identified TPA that has multiple public transit options (with access to existing local and regional bus and rail service), and employment opportunities, restaurants and entertainment, all within walking distance.

21. Page IV.A-57, Subsection 3.d), Threshold (a)(1)(b), *General Plan Air Quality Element*, Table IV.A-6, *Consistency with Applicable Air Quality Policies of the General Plan*, revise the 2nd sentence of the conflict analysis for Air Quality Element Goal 2 as follows:

In addition, the Project would include on-site residential, ~~hotel~~, office, retail, and commercial/restaurant land uses which would serve the local community and reduce reliance on single-occupancy vehicles.

22. Page IV.A-59, Subsection 3.d), Threshold (a)(1)(b), *General Plan Air Quality Element*, Table IV.A-6, *Consistency with Applicable Air Quality Policies of the General Plan*, revise the 1st sentence of the conflict analysis for Air Quality Element Goal 4 as follows:

The Project would reduce trips and VMT due to its mixed-use design and increased density in an urban infill location within an identified HQTa and TPA, on-site amenities and residential, ~~hotel~~, office, retail, commercial/restaurant uses, access to public transportation within a quarter-mile of the Project Site, and close proximity to multiple other destinations including job centers and retail uses.

23. Page IV.A-60, Subsection 3.d), Threshold (a)(1)(b), *General Plan Air Quality Element*, Table IV.A-6, *Consistency with Applicable Air Quality Policies of the General Plan*, revise the 2nd sentence of the conflict analysis for Air Quality Element Objective 4.2 as follows:

The Project would include on-site retail, office, ~~hotel~~, restaurant, commercial, and residential land uses that would serve the local community and would be located within a quarter-mile of off-site commercial and residential uses.

24. Page IV.A-61, Subsection 3.d), Threshold (a)(1)(b), *General Plan Air Quality Element*, Table IV.A-6, *Consistency with Applicable Air Quality Policies of the General Plan*, revise the 1st sentence of the conflict analysis for Air Quality Element Policy 4.2.2 as follows:

The Project would provide residential, office, retail, ~~hotel~~, and commercial/restaurant uses in a compact urban infill location.

25. Page IV.A-62, Subsection 3.d), Threshold (a)(1)(b), *General Plan Air Quality Element*, Table IV.A-6, *Consistency with Applicable Air Quality Policies of the General Plan*, revise the 3rd to last sentence of the conflict analysis for Air Quality Element Goal 5 as follows:

The Project would also include ~~422-439~~ new trees, including street trees.

26. Page IV.A-63, Subsection 3.d), Threshold (a)(1)(b), *General Plan Air Quality Element*, revise the 3rd to last sentence of the 1st partial paragraph and footnote as follows:

As shown in Appendix B, *Air Quality and Greenhouse Gas Emissions Appendix*, and the Project's TA, included as Appendix J of this Draft EIR,⁹⁴ incorporation of USEPA MXD VMT reduction features applicable to the Project results in a ~~34.0~~ 35.4-percent reduction in overall VMT for the Project and resultant pollutant emissions.

⁹⁴ Central Project, June 2022. Provided in Appendix J of the Project's Draft EIR; see Appendix F of the Final EIR for the VMT analysis associated with the Project design modifications.

27. Page IV.A-63, Subsection 3.d), Threshold (a)(2)(a), *Construction*, revise Mitigation Measure AQ-MM-1, *Construction Equipment Features*, as follows:

AQ-MM-1: Construction Equipment Features: The Applicant shall implement the following construction equipment features for equipment operating at the Project Site.

These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at ~~50-25~~ horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.
- Contractors shall ensure that all air compressors, cement and mortar mixers, concrete/industrial saws, plate compactors, rollers, signal boards, skid-steer loaders, sweepers/scrubbers and welders used during construction activities are electric-powered. Additionally, contractors shall ensure one piece of the following types of equipment from each construction activity that uses them would be electric-powered: tractor/loader/backhoes, forklifts, graders, pumps and rough terrain forklifts. In addition, where commercially available for the Project Site, construction equipment shall meet Tier 5 requirements when standards are adopted by CARB. For purposes of this mitigation measure, "commercially available" is defined as equipment built by the original manufacturer and available for lease or hire within 20 miles of the City of Los Angeles and available in a similar timeframe to fossil-fueled options. If Tier 5 engine equipment is not commercially available, the contractor must show proof that the equipment is not commercially available by providing letters from at least two independent rental companies, each of which must own or operate a construction equipment fleet with total maximum horsepower of greater than 2,500 horsepower, for each piece of off-road equipment where the Tier 5 engine equipment is not available. This requirement shall be incorporated into applicable bid documents, purchase orders, and contracts with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment.

28. Page IV.A-66, Subsection 3.d), Threshold (b)(1)(a), *Construction*, add a sentence at the end of the 1st full paragraph as follows:

Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of this Final EIR for air quality calculations associated with the Project with design modifications.

29. Page IV.A-66, Subsection 3.d), Threshold (b)(1)(a), *Construction*, revise the last sentence of the 2nd full paragraph as follows:

Therefore, the Project's temporary impact related to regional VOC, NO_x and CO construction emissions would be potentially significant ~~and mitigation is required~~. ~~As discussed below, this impact would remain significant and unavoidable with the implementation of feasible mitigation measures.~~

30. Page IV.A-72, Subsection 3.d), Threshold (b)(1)(b), *Operation*, add a sentence after the 3rd sentence in the 1st paragraph as follows:

Mobile, stationary, and area source operational regional criteria pollutant emissions were calculated for the Project's full buildout year. Operational emission estimates include compliance with SCAQMD rules and regulations, such as Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with operation of the Project with design modifications.

31. Pages IV.A-73 and IV.A-74, Subsection 3.d), Threshold (b)(1)(b), *Operation*, revise the last sentence of the partial paragraph and Table IV.A-12 as follows:

As the Project's maximum net regional emissions from interim operations and concurrent construction-operational-related daily emission and operations would exceed the thresholds of significance, regional operational emissions impacts would be significant ~~and mitigation is required~~. ~~As discussed below, this impact would remain significant and unavoidable with the implementation of feasible mitigation measures.~~

TABLE IV.A-12
ESTIMATED MAXIMUM REGIONAL INTERIM OPERATIONAL EMISSIONS AND CONCURRENT
CONSTRUCTION OF THE REMAINING BUILDINGS – PROJECT (POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Existing						
Area	9	0	0	0	0	0
Energy (Natural Gas)	<1	2	2	<1	<1	<1
Motor Vehicles	4	79	42	<1	13	4
Delivery Truck TRUs	16	160	195	<1	5	5
Emergency Generators	1	11	10	<1	<1	<1
Total Existing	29	252	250	<1	18	9
Project Interim Operations						
Area (Consumer Products, Architectural Coating, Landscaping)	~~27~~ <u>34</u>	~~4~~ <u>1</u>	~~66~~ <u>74</u>	<1	<1	<1
Motor Vehicles	~~11~~ <u>9</u>	~~46~~ <u>13</u>	~~104~~ <u>83</u>	<1	~~30~~ <u>24</u>	~~8~~ <u>6</u>
Emergency Generators	~~4~~ <u>5</u>	~~80~~ <u>90</u>	~~46~~ <u>51</u>	<1	<1	<1
Charbroilers	<1	-	-	-	1	<1
Cooling Towers	-	-	-	-	<1	<1
Project Overlapping Construction						
Foundations + Building Construction - Building 3 + Building Construction - Building 4 + Building Construction - Building 5	16	290	265	2	60	19
Building Construction - Building 1 + Architectural Coating - Building 1 + Building Construction - Building 2	9	65	106	<1	17	5
Building Construction – Building 10 + Paving	3	29	42	<1	3	2
Total Project (Interim Conditions)	~~74~~ <u>76</u>	~~480~~ <u>487</u>	~~628~~ <u>621</u>	~~3~~ <u>2</u>	~~111~~ <u>106</u>	~~34~~ <u>33</u>
Net Increase (Interim Conditions)						
Area (Coating, Consumer Products, Landscaping)	~~18~~ <u>25</u>	~~4~~ <u>1</u>	~~66~~ <u>74</u>	<1	<1	<1
Energy	<1	-2	-2	<1	<1	<1
Mobile	~~8~~ <u>6</u>	~~63~~ <u>66</u>	~~62~~ <u>41</u>	<1	~~17~~ <u>11</u>	~~4~~ <u>2</u>
Emergency Generators	~~4~~ <u>4</u>	~~69~~ <u>79</u>	~~35~~ <u>41</u>	<1	<1	<1
Charbroilers	<1	-	-	-	1	<1
Cooling Towers	-	-	-	-	<1	<1
Construction						

TABLE IV.A-12
ESTIMATED MAXIMUM REGIONAL INTERIM OPERATIONAL EMISSIONS AND CONCURRENT
CONSTRUCTION OF THE REMAINING BUILDINGS – PROJECT (POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM10	PM2.5
Foundations + Building Construction - Building 3 + Building Construction - Building 4 + Building Construction - Building 5	16	290	265	2	60	19
Foundations + Building Construction - Building 6 + Building Construction - Building 7 + Building Construction - Building - Building 8 + Building Construction – Building 9	9	65	106	<1	17	5
Building Construction – Building 10 + Paving	3	29	42	<1	3	2
Delivery Truck TRUs	-16	-160	-195	<1	-5	-5
Net Total Regional Emissions (Interim Conditions)	42 <u>47</u>	~~227~~ <u>234</u>	~~379~~ <u>372</u>	2	~~93~~ <u>88</u>	~~25~~ <u>24</u>
SCAQMD Thresholds of Significance	55	55	550	150	150	55
Exceeds Thresholds?	No	Yes	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of this Final EIR for air quality calculations associated with the Project with design modifications.

^b Area source VOC emissions are primarily emitted by consumer product usage as estimated in CalEEMod.

SOURCE: ESA, 2023. Updated in May 2024.

32. Page IV.A-75, Subsection 3.d), Threshold (b)(1)(b), *Operation*, revise Table IV.A-13 as follows:

TABLE IV.A-13
ESTIMATED MAXIMUM REGIONAL OPERATIONAL EMISSIONS – PROJECT (POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Existing						
Area	9	0	0	0	0	0
Energy (Natural Gas)	<1	2	2	<1	<1	<1
Motor Vehicles	4	79	42	<1	13	4
Delivery Truck TRUs	16	160	195	<1	5	5
Emergency Generators	1	11	10	<1	<1	<1
Total Existing	29	252	250	<1	18	9
Project						
Area (Consumer Products, Architectural Coating, Landscaping)	78	2	~~476~~ <u>177</u>	<1	<1	<1
Motor Vehicles	~~22~~ <u>24</u>	~~30~~ <u>33</u>	~~199~~ <u>220</u>	1	~~64~~ <u>71</u>	~~16~~ <u>18</u>
Emergency Generators	12	220	126	<1	1	1
Charbroilers	1	-	-	-	2	1
Cooling Towers	-	-	-	-	<1	<1
Total Project	~~112~~ <u>114</u>	~~251~~ <u>254</u>	~~500~~ <u>522</u>	1	~~67~~ <u>74</u>	~~19~~ <u>20</u>
Net Increase						
Area (Coating, Consumer Products, Landscaping)	69	2	~~476~~ <u>177</u>	<1	<1	<1
Energy	<1	-2	-2	<1	<1	<1
Mobile	~~48~~ <u>21</u>	~~49~~ <u>46</u>	~~157~~ <u>178</u>	<1	~~54~~ <u>58</u>	~~12~~ <u>14</u>
Emergency Generators	11	208	115	<1	1	1
Charbroilers	<1	-	-	-	2	<1
Cooling Towers	-	-	-	-	<1	<1
Delivery Truck TRUs	-16	-160	-195	<1	-5	-5
Net Total Regional Emissions	~~83~~ <u>85</u>	~~4~~ <u>2</u>	~~251~~ <u>273</u>	<1	~~49~~ <u>56</u>	~~10~~ <u>11</u>
SCAQMD Thresholds of Significance	55	55	550	150	150	55
Exceeds Thresholds?	Yes	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of this Final EIR for air quality calculations associated with the Project with design modifications.

^b Area source VOC emissions are primarily emitted by consumer product usage as estimated in CalEEMod.

SOURCE: ESA, 2023. Updated in May 2024.

33. Page IV.A-76, Subsection 3.d), Threshold (b)(2)(a), *Construction*, revise Mitigation Measure AQ-MM-1, *Construction Equipment Features*, as follows:

AQ-MM-1: Construction Equipment Features: The Applicant shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50-25 horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.
- Contractors shall ensure that all air compressors, cement and mortar mixers, concrete/industrial saws, plate compactors, rollers, signal boards, skid-steer loaders, sweepers/scrubbers and welders used during construction activities are electric-powered. Additionally, contractors shall ensure one piece of the following types of equipment from each construction activity that uses them would be electric- powered: tractor/loader/backhoes, forklifts, graders, pumps and rough terrain forklifts. In addition, where commercially available for the Project Site, construction equipment shall meet Tier 5 requirements when standards are adopted by CARB. For purposes of this mitigation measure, "commercially available" is defined as equipment built by the original manufacturer and available for lease or hire within 20 miles of the City of Los Angeles and available in a similar timeframe to fossil-fueled options. If Tier 5 engine equipment is not commercially available, the contractor must show proof that the equipment is not commercially available by providing letters from at least two independent rental companies, each of which must own or operate a construction equipment fleet with total maximum horsepower of greater than 2,500 horsepower, for each piece of off-road equipment where the Tier 5 engine equipment is not available. This requirement shall be incorporated into applicable bid documents, purchase orders, and contracts with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities. A copy of each unit's certified tier specification or model

year specification shall be available upon request at the time of mobilization of each applicable unit of equipment.

34. Pages IV.A-78 to IV.A-83, Subsection 3.d), Threshold (a)(3)(a), *Construction*, revise and update Tables IV.A-14 to IV.A-19 as shown below. For ease of reviewing the changes, the tables are fully shown in strikethrough text and reproduced with the updated numbers in double underline as shown below.

TABLE IV.A-14
~~ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE NORTH SITE~~
~~(POUNDS PER DAY)^a~~

Source	VOC	NO _x	CO	SO ₂	PM ₁₀ ^b	PM _{2.5} ^b
Construction Phases						
Demolition	1.8	24.7	39.0	0.1	4.2	1.4
Site Preparation	0.3	1.3	15.1	0.0	3.6	1.6
Grading	2.2	54.5	57.3	0.4	13.5	4.7
~~Building Construction—Building 1~~	~~2.2~~	~~19.3~~	~~74.1~~	~~0.2~~	~~13.8~~	~~3.7~~
Foundations	2.9	51.0	441.8	0.1	23.2	6.7
~~Building Construction—Building 2~~	~~2.4~~	~~23.0~~	~~88.3~~	~~0.2~~	~~14.5~~	~~4.0~~
~~Architectural Coating—Building 1~~	~~2.2~~	~~1.1~~	~~1.5~~	~~<0.1~~	~~<0.1~~	~~<0.1~~
~~Architectural Coating—Building 2~~	~~13.8~~	~~1.1~~	~~1.5~~	~~<0.1~~	~~<0.1~~	~~<0.1~~
Paving	0.6	4.1	19.0	<0.1	0.4	0.2
Overlapping Phases						
Demolition + Site Preparation	2.0	26.0	54.2	0.2	7.8	3.0
~~Foundations + Building Construction—Building 1 + Building Construction—Building 2~~	~~7.0~~	~~90.8~~	~~568.0~~	~~0.4~~	~~39.1~~	~~11.2~~
~~Building Construction—Building 1 + Architectural Coating—Building 1 + Building Construction—Building 2~~	~~6.3~~	~~40.9~~	~~127.8~~	~~0.3~~	~~15.9~~	~~4.6~~
~~Building Construction—Building 2 + Architectural Coating—Building 2~~	~~15.9~~	~~21.4~~	~~73.0~~	~~0.2~~	~~13.8~~	~~3.7~~
~~Building Construction—Building 2 + Architectural Coating—Building 2 + Paving~~	~~16.5~~	~~25.6~~	~~92.0~~	~~0.2~~	~~14.2~~	~~3.9~~
Maximum Daily Emissions	16.5	90.8	568.0	0.4	39.1	11.2
SCAQMD Thresholds of Significance	75	100	550	150	150	55
Exceeds Thresholds?	No	No	Yes	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2023.

TABLE IV.A-15
ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE LOWER SOUTH SITE
(POUNDS PER DAY)^a

Source	VOC	NO _x	CO	SO ₂	PM10 ^b	PM2.5 ^b
Construction Phases						
Demolition	1.8	24.8	40.8	0.2	5.2	1.6
Site Preparation	0.5	2.7	29.5	0.1	8.2	4.1
Grading	2.1	53.9	54.6	0.4	11.2	3.4
Parking Garage Construction	1.3	11.1	39.2	0.1	3.7	1.1
Foundations	5.6	66.3	510.7	0.2	25.9	7.8
Building Construction—Building 6	2.5	26.4	90.7	0.2	16.0	4.3
Building Construction—Building 7	1.9	15.2	69.2	0.2	14.5	3.9
Building Construction—Building 8	1.9	15.6	69.5	0.2	14.6	3.9
Building Construction—Building 9	2.1	19.0	84.8	0.2	15.1	4.1
Architectural Coating—Building 6	2.9	1.1	1.5	0.0	0.0	0.0
Architectural Coating—Building 7	1.9	1.1	1.5	0.0	0.0	0.0
Architectural Coating—Building 8	2.7	1.1	1.5	0.0	0.0	0.0
Architectural Coating—Building 9	4.5	1.1	1.5	0.0	0.0	0.0
Paving	0.6	4.3	21.0	0.0	1.2	0.4
Overlapping Phases						
Demolition + Site Preparation	2.3	27.5	70.3	0.2	13.4	5.8
Grading + Parking Garage Construction	2.1	16.3	66.6	0.1	5.1	1.6
Foundations + Building Construction—Building 6 + Building Construction—Building 7 + Building Construction—Building 8 + Building Construction—Building 9	12.3	135.3	717.3	0.6	46.3	13.9
Building Construction—Building 6 + Architectural Coating—Building 6 + Building Construction—Building 7 + Architectural Coating—Building 7 Building Construction—Building 8 + Architectural Coating—Building 8 + Building Construction—Building 9 + Architectural Coating—Building 9	18.6	73.4	212.6	0.4	20.6	6.2
Building Construction—Building 6 + Architectural Coating—Building 6 + Building Construction—Building 7 + Architectural Coating—Building 7 Building Construction—Building 8 + Architectural Coating—Building 8 + Building Construction—Building 9 + Architectural Coating—Building 9 + Paving	18.8	71.2	183.7	0.5	19.0	5.8
Maximum Daily Emissions	18.8	135.3	717.3	0.6	46.3	13.9
SCAQMD Thresholds of Significance	75	100	550	150	150	55
Exceeds Thresholds?	No	Yes	Yes	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2023.

TABLE IV.A-16
~~ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE UPPER SOUTH SITE~~
~~(POUNDS PER DAY)^a~~

Source	VOC	NO_x	CO	SO₂	PM10^b	PM2.5^b
Construction Phases						
Demolition	1.8	24.7	39.5	0.2	4.5	1.5
Site Preparation	0.3	1.4	16.5	0.0	1.1	0.2
Grading	1.8	41.7	46.7	0.3	8.4	2.6
Parking Garage Construction	1.0	8.2	33.0	0.0	2.7	0.9
Foundations	3.9	52.7	432.7	0.1	23.3	6.9
Building Construction – Building 3	2.0	19.8	70.3	0.2	14.3	3.8
Building Construction – Building 4	1.9	16.3	67.5	0.2	13.7	3.7
Building Construction – Building 5	1.7	17.3	66.7	0.2	14.3	3.8
Architectural Coating – Building 3	5.0	1.1	1.5	<0.1	<0.1	<0.1
Architectural Coating – Building 4	8.7	1.1	1.5	<0.1	<0.1	<0.1
Architectural Coating – Building 5	17.5	1.1	1.5	<0.1	<0.1	<0.1
Paving	0.6	4.3	21.0	0.0	1.2	0.4
Overlapping Phases						
Demolition + Site Preparation	2.1	26.2	56.0	0.2	5.6	1.7
Grading + Parking Garage Construction	1.8	13.4	59.3	0.1	3.8	1.2
Foundations + Building Construction – Building 3 + Building Construction – Building 4 + Building Construction – Building 5	8.5	101.6	570.9	0.4	41.2	12.0
Building Construction – Building 3 + Architectural Coating – Building 3 + Building Construction – Building 4 + Building Construction – Building 5	9.5	49.9	139.7	0.3	18.0	5.2
Building Construction – Building 3 + Building Construction – Building 4 + Architectural Coating – Building 4 + Building Construction – Building 5 + Architectural Coating – Building 5 + Paving	31.1	50.4	124.4	0.3	17.1	5.0
Maximum Daily Emissions	31.1	101.6	570.9	0.4	41.2	12.0
SCAQMD Thresholds of Significance	75	100	550	150	150	55
Exceeds Thresholds?	No	Yes	Yes	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2023.

TABLE IV.A-17
~~ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE WEST SITE~~
(POUNDS PER DAY)^a

Source	VOC	NO _x	CO	SO ₂	PM10 ^b	PM2.5 ^b
Construction Phases						
Demolition	1.1	16.4	26.2	0.1	2.4	0.8
Site Preparation	0.1	0.4	6.4	<0.1	0.4	0.1
Grading	1.0	18.2	27.4	0.1	3.7	1.2
Foundations	4.6	53.6	378.7	0.1	16.6	5.2
Building Construction – Building 10	1.5	14.0	40.8	0.1	3.4	1.1
Architectural Coating – Building 10	4.0	1.1	1.5	<0.1	<0.1	<0.1
Paving	0.7	4.5	22.7	<0.1	0.3	0.2
Overlapping Phases						
Demolition + Site Preparation + Grading	2.2	35.0	60.0	0.2	6.5	2.1
Foundations + Building Construction – Building 10	6.1	67.6	419.5	0.2	20.0	6.3
Building Construction – Building 10 + Paving	2.1	16.8	50.3	0.1	3.0	1.1
Building Construction – Building 10 + Architectural Coating – Building 10	5.4	13.4	29.1	0.1	2.8	0.9
Maximum Daily Emissions	6.1	67.6	419.5	0.2	20.0	6.3
SCAQMD Thresholds of Significance	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2023.

TABLE IV.A-18**~~ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR MAXIMUM OVERLAPPING OF CONSTRUCTION (POUNDS PER DAY)^a~~**

Source	VOC	NO_x	CO	SO₂	PM10^b	PM2.5^b
~~Overall Construction (Excluding Foundations)~~						
~~Upper South (Building Construction – Building 3 + Building Construction – Building 4 + Architectural Coating – Building 4 + Building Construction – Building 5 + Architectural Coating – Building 5 + Paving)~~	~~31.1~~	~~50.4~~	~~124.4~~	~~0.3~~	~~17.1~~	~~5.0~~
~~Lower South (Building Construction – Building 6 + Architectural Coating – Building 6 + Building Construction – Building 7 + Architectural Coating – Building 7 + Building Construction – Building 8 + Architectural Coating – Building 8 + Building Construction – Building 9 + Architectural Coating – Building 9 + Paving)~~	~~18.8~~	~~71.2~~	~~183.7~~	~~0.5~~	~~19.0~~	~~5.8~~
~~North (Building Construction – Building 1 + Architectural Coating – Building 1 + Building Construction – Building 2)~~	~~6.3~~	~~40.9~~	~~127.8~~	~~0.3~~	~~15.9~~	~~4.6~~
~~West (Building Construction – Building – 10 + Paving)~~	~~2.1~~	~~16.8~~	~~50.3~~	~~0.1~~	~~3.0~~	~~1.1~~
~~Subtotal~~	~~58.2~~	~~179.3~~	~~486.2~~	~~1.2~~	~~55.0~~	~~16.4~~
~~Foundations and Concurrent Construction on Remaining Sites~~						
~~Upper South (Building Construction – Building 3 + Architectural Coating – Building 3 + Building Construction – Building 4 + Building Construction – Building 5)~~	~~9.5~~	~~49.9~~	~~139.7~~	~~0.3~~	~~18.0~~	~~5.2~~
~~Lower South (Foundations + Building Construction – Building 6 + Building Construction – Building 7 + Building Construction – Building 8 + Building Construction – Building 9)~~	~~12.3~~	~~135.3~~	~~717.3~~	~~0.6~~	~~46.3~~	~~13.9~~
~~North (Building Construction – Building 1 + Architectural Coating – Building 1 + Building Construction – Building 2)~~	~~6.3~~	~~40.9~~	~~127.8~~	~~0.3~~	~~15.9~~	~~4.6~~
~~West (Building Construction – Building – 10 + Paving)~~	~~2.1~~	~~16.8~~	~~50.3~~	~~0.1~~	~~3.0~~	~~1.1~~
~~Subtotal~~	~~30.2~~	~~242.9~~	~~1,035.0~~	~~1.3~~	~~83.3~~	~~24.8~~
~~Grading on Four Sites~~						
~~Upper South (Grading)~~	~~1.8~~	~~41.7~~	~~46.7~~	~~0.3~~	~~8.4~~	~~2.6~~
~~Lower South (Grading)~~	~~2.1~~	~~53.9~~	~~54.6~~	~~0.4~~	~~11.2~~	~~3.4~~
~~North (Grading)~~	~~2.2~~	~~54.5~~	~~57.3~~	~~0.4~~	~~13.5~~	~~4.7~~
~~West (Grading)~~	~~1.0~~	~~18.2~~	~~27.4~~	~~0.1~~	~~3.7~~	~~1.2~~
~~Subtotal~~	~~7.1~~	~~168.2~~	~~186.0~~	~~1.2~~	~~36.7~~	~~11.9~~

TABLE IV.A-18**~~ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR MAXIMUM OVERLAPPING OF CONSTRUCTION (POUNDS PER DAY)-^a~~**

Source	VOC	NO_x	CO	SO₂	PM10^b	PM2.5^b
Architectural Coating and Overlapping Phases on Four Sites						
Upper South (~~Building Construction – Building 3 + Building Construction – Building 4 + Architectural Coating – Building 4 + Building Construction – Building 5 + Architectural Coating – Building 5 + Paving~~)	31.1	50.4	124.4	0.3	17.1	5.0
Lower South (~~Building Construction – Building 6 + Architectural Coating – Building 6 + Building Construction – Building 7 + Architectural Coating – Building 7 + Building Construction – Building 8 + Architectural Coating – Building 8 + Building Construction – Building 9 + Architectural Coating – Building 9 + Paving~~)	18.8	71.2	183.7	0.5	19.0	5.8
North (~~Building Construction – Building 2 + Architectural Coating – Building 2 + Paving~~)	16.5	25.6	92.0	0.2	14.2	3.9
West (~~Building Construction – Building 10 + Architectural Coating – Building 10~~)	5.4	13.4	29.1	0.1	2.8	0.9
Subtotal	71.8	160.6	429.2	1.1	53.1	15.6
Maximum Daily Emissions	71.8	242.9	1,035.0	1.3	83.3	24.8
SCAQMD Thresholds of Significance	75	100	550	150	150	55
Exceeds Thresholds?	No	Yes	Yes	No	No	No

^a ~~Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.~~

^b ~~Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.~~

~~SOURCE: ESA, 2023.~~

TABLE IV.A-14
ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE NORTH SITE
(POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM10 ^b	PM2.5 ^b
Construction Phases						
Demolition	<u>0.7</u>	<u>18.1</u>	<u>29.5</u>	<u>0.1</u>	<u>4.0</u>	<u>1.2</u>
Site Preparation	<u>0.2</u>	<u>0.8</u>	<u>9.1</u>	<u><0.1</u>	<u>3.6</u>	<u>1.6</u>
Grading	<u>1.7</u>	<u>51.7</u>	<u>50.5</u>	<u>0.4</u>	<u>13.3</u>	<u>4.6</u>
Building Construction - Building 1	<u>1.3</u>	<u>12.8</u>	<u>62.3</u>	<u>0.2</u>	<u>13.6</u>	<u>3.5</u>
Foundations	<u>2.1</u>	<u>43.3</u>	<u>430.3</u>	<u><0.1</u>	<u>23.0</u>	<u>6.5</u>
Building Construction - Building 2	<u>1.3</u>	<u>13.6</u>	<u>71.5</u>	<u>0.2</u>	<u>14.3</u>	<u>3.7</u>
Architectural Coating - Building 1	<u>2.1</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 2	<u>13.6</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Paving	<u>0.2</u>	<u>1.1</u>	<u>13.6</u>	<u><0.1</u>	<u>0.3</u>	<u>0.1</u>
Overlapping Phases						
Demolition + Site Preparation	<u>0.9</u>	<u>18.9</u>	<u>38.7</u>	<u>0.2</u>	<u>7.5</u>	<u>2.7</u>
Foundations + Building Construction - Building 1 + Building Construction - Building 2	<u>4.1</u>	<u>67.1</u>	<u>528.1</u>	<u>0.3</u>	<u>38.4</u>	<u>10.6</u>
Building Construction - Building 1 + Architectural Coating - Building 1 + Building Construction - Building 2	<u>4.0</u>	<u>23.9</u>	<u>97.7</u>	<u>0.3</u>	<u>15.4</u>	<u>4.1</u>
Building Construction - Building 2 + Architectural Coating - Building 2	<u>14.7</u>	<u>11.4</u>	<u>54.9</u>	<u>0.2</u>	<u>13.6</u>	<u>3.5</u>
Building Construction - Building 2 + Architectural Coating – Building 2 + Paving	<u>14.9</u>	<u>12.5</u>	<u>68.5</u>	<u>0.2</u>	<u>13.9</u>	<u>3.6</u>
Maximum Daily Emissions	<u>14.9</u>	<u>67.1</u>	<u>528.1</u>	<u>0.4</u>	<u>38.4</u>	<u>10.6</u>
SCAQMD Thresholds of Significance	<u>75</u>	<u>100</u>	<u>550</u>	<u>150</u>	<u>150</u>	<u>55</u>
Exceeds Thresholds?	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of this Final EIR for air quality calculations associated with the Project with design modifications.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2023. Updated in May 2024.

TABLE IV.A-15
ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE LOWER SOUTH SITE
(POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM ₁₀ ^b	PM _{2.5} ^b
Construction Phases						
Demolition	<u>0.8</u>	<u>18.2</u>	<u>31.3</u>	<u>0.1</u>	<u>5.0</u>	<u>1.4</u>
Site Preparation	<u>0.5</u>	<u>2.5</u>	<u>27.5</u>	<u><0.1</u>	<u>8.1</u>	<u>4.1</u>
Grading	<u>1.6</u>	<u>51.4</u>	<u>48.1</u>	<u>0.4</u>	<u>11.0</u>	<u>3.3</u>
Parking Garage Construction	<u>0.3</u>	<u>3.7</u>	<u>28.1</u>	<u><0.1</u>	<u>3.5</u>	<u>0.9</u>
Foundations	<u>3.5</u>	<u>52.3</u>	<u>485.3</u>	<u>0.1</u>	<u>25.3</u>	<u>7.3</u>
Building Construction - Building 6	<u>1.4</u>	<u>17.3</u>	<u>74.0</u>	<u>0.2</u>	<u>15.7</u>	<u>4.1</u>
Building Construction - Building 7	<u>0.9</u>	<u>7.9</u>	<u>58.1</u>	<u>0.1</u>	<u>14.3</u>	<u>3.7</u>
Building Construction - Building 8	<u>0.9</u>	<u>8.3</u>	<u>58.4</u>	<u>0.1</u>	<u>14.4</u>	<u>3.7</u>
Building Construction - Building 9	<u>1.3</u>	<u>12.6</u>	<u>73.0</u>	<u>0.2</u>	<u>14.9</u>	<u>3.9</u>
Architectural Coating - Building 6	<u>2.7</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 7	<u>1.7</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 8	<u>2.6</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 9	<u>4.3</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Paving	<u>0.3</u>	<u>1.3</u>	<u>15.6</u>	<u><0.1</u>	<u>1.1</u>	<u>0.3</u>
Overlapping Phases						
Demolition + Site Preparation	<u>1.3</u>	<u>20.7</u>	<u>58.8</u>	<u>0.2</u>	<u>13.1</u>	<u>5.5</u>
Grading + Parking Garage Construction	<u>0.7</u>	<u>6.6</u>	<u>48.9</u>	<u>0.1</u>	<u>4.8</u>	<u>1.3</u>
Foundations + Building Construction - Building 6 + Building Construction - Building 7 + Building Construction - Building 8 + Building Construction - Building 9	<u>6.2</u>	<u>91.0</u>	<u>641.1</u>	<u>0.5</u>	<u>44.9</u>	<u>12.6</u>
Building Construction - Building 6 + Architectural Coating - Building 6 + Building Construction - Building 7 + Architectural Coating - Building 7 Building Construction - Building 8 + Architectural Coating - Building 8 + Building Construction - Building 9 + Architectural Coating - Building 9	<u>14.0</u>	<u>38.6</u>	<u>155.9</u>	<u>0.3</u>	<u>19.6</u>	<u>5.3</u>
Building Construction - Building 6 + Architectural Coating - Building 6 + Building Construction - Building 7 + Architectural Coating - Building 7 Building Construction - Building 8 + Architectural Coating - Building 8 + Building Construction - Building 9 + Architectural Coating - Building 9 + Paving	<u>14.0</u>	<u>34.2</u>	<u>121.8</u>	<u>0.4</u>	<u>18.0</u>	<u>4.9</u>
Maximum Daily Emissions	<u>14.0</u>	<u>91.0</u>	<u>641.1</u>	<u>0.5</u>	<u>44.9</u>	<u>12.6</u>
SCAQMD Thresholds of Significance	<u>75</u>	<u>100</u>	<u>550</u>	<u>150</u>	<u>150</u>	<u>55</u>
Exceeds Thresholds?	<u>No</u>	<u>No</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>No</u>

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2023. Updated in May 2024.

TABLE IV.A-16
ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE UPPER SOUTH SITE
(POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM10 ^b	PM2.5 ^b
Construction Phases						
Demolition	<u>0.8</u>	<u>18.1</u>	<u>30.0</u>	<u>0.1</u>	<u>4.3</u>	<u>1.2</u>
Site Preparation	<u>0.2</u>	<u>1.0</u>	<u>10.5</u>	<u><0.1</u>	<u>1.0</u>	<u>0.2</u>
Grading	<u>1.3</u>	<u>39.2</u>	<u>40.2</u>	<u>0.3</u>	<u>8.2</u>	<u>2.5</u>
Parking Garage Construction	<u>0.4</u>	<u>3.5</u>	<u>24.9</u>	<u><0.1</u>	<u>2.6</u>	<u>0.7</u>
Foundations	<u>2.3</u>	<u>40.6</u>	<u>408.3</u>	<u>0.1</u>	<u>22.9</u>	<u>6.5</u>
Building Construction - Building 3	<u>1.0</u>	<u>12.4</u>	<u>59.1</u>	<u>0.2</u>	<u>14.1</u>	<u>3.6</u>
Building Construction - Building 4	<u>0.9</u>	<u>8.9</u>	<u>56.4</u>	<u>0.1</u>	<u>13.5</u>	<u>3.5</u>
Building Construction - Building 5	<u>1.1</u>	<u>12.5</u>	<u>58.6</u>	<u>0.2</u>	<u>14.1</u>	<u>3.7</u>
Architectural Coating - Building 3	<u>4.8</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 4	<u>8.6</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 5	<u>17.4</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Paving	<u>0.3</u>	<u>1.3</u>	<u>15.6</u>	<u><0.1</u>	<u>1.1</u>	<u>0.3</u>
Overlapping Phases						
Demolition + Site Preparation	<u>1.0</u>	<u>19.1</u>	<u>40.5</u>	<u>0.2</u>	<u>5.3</u>	<u>1.4</u>
Grading + Parking Garage Construction	<u>0.7</u>	<u>6.2</u>	<u>44.6</u>	<u>0.1</u>	<u>3.5</u>	<u>0.9</u>
Foundations + Building Construction - Building 3 + Building Construction - Building 4 + Building Construction - Building 5	<u>4.2</u>	<u>69.9</u>	<u>516.0</u>	<u>0.3</u>	<u>40.2</u>	<u>11.1</u>
Building Construction - Building 3 + Architectural Coating - Building 3 + Building Construction - Building 4 + Building Construction - Building 5	<u>6.7</u>	<u>29.3</u>	<u>107.7</u>	<u>0.3</u>	<u>17.3</u>	<u>4.6</u>
Building Construction - Building 3 + Building Construction - Building 4 + Architectural Coating - Building 4 + Building Construction - Building 5 + Architectural Coating - Building 5 + Paving	<u>27.9</u>	<u>26.1</u>	<u>85.7</u>	<u>0.3</u>	<u>16.4</u>	<u>4.4</u>
Maximum Daily Emissions	<u>27.9</u>	<u>69.9</u>	<u>516.0</u>	<u>0.3</u>	<u>40.2</u>	<u>11.1</u>
SCAQMD Thresholds of Significance	<u>75</u>	<u>100</u>	<u>550</u>	<u>150</u>	<u>150</u>	<u>55</u>
Exceeds Thresholds?	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2023. Updated in May 2024.

TABLE IV.A-17
ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE WEST SITE
(POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM10 ^b	PM2.5 ^b
Construction Phases						
Demolition	<u>0.4</u>	<u>10.6</u>	<u>15.8</u>	<u>0.1</u>	<u>2.2</u>	<u>0.7</u>
Site Preparation	<u><0.1</u>	<u><0.1</u>	<u>0.4</u>	<u><0.1</u>	<u>0.3</u>	<u>0.1</u>
Grading	<u>0.6</u>	<u>16.3</u>	<u>21.1</u>	<u>0.1</u>	<u>3.6</u>	<u>1.1</u>
Foundations	<u>2.7</u>	<u>39.6</u>	<u>353.0</u>	<u>0.1</u>	<u>16.1</u>	<u>4.8</u>
Building Construction - Building 10	<u>0.4</u>	<u>6.3</u>	<u>29.6</u>	<u><0.1</u>	<u>3.1</u>	<u>0.9</u>
Architectural Coating - Building 10	<u>3.8</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Paving	<u>0.2</u>	<u>1.1</u>	<u>13.3</u>	<u><0.1</u>	<u>0.2</u>	<u>0.1</u>
Overlapping Phases						
Demolition + Site Preparation + Grading	<u>1.1</u>	<u>26.9</u>	<u>37.4</u>	<u>0.2</u>	<u>6.2</u>	<u>1.8</u>
Foundations + Building Construction - Building 10	<u>3.1</u>	<u>45.9</u>	<u>382.6</u>	<u>0.1</u>	<u>19.3</u>	<u>5.6</u>
Building Construction - Building 10 + Paving	<u>0.6</u>	<u>5.9</u>	<u>29.7</u>	<u>0.1</u>	<u>2.7</u>	<u>0.7</u>
Building Construction - Building 10 + Architectural Coating - Building 10	<u>4.2</u>	<u>4.8</u>	<u>16.4</u>	<u><0.1</u>	<u>2.5</u>	<u>0.7</u>
Maximum Daily Emissions	<u>4.2</u>	<u>45.9</u>	<u>382.6</u>	<u>0.2</u>	<u>19.3</u>	<u>5.6</u>
SCAQMD Thresholds of Significance	<u>75</u>	<u>100</u>	<u>550</u>	<u>150</u>	<u>150</u>	<u>55</u>
Exceeds Thresholds?	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2023. Updated in May 2024.

TABLE IV.A-18

ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR MAXIMUM OVERLAPPING OF CONSTRUCTION (POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM10 ^b	PM2.5 ^b
Overall Construction (Excluding Foundations)						
Upper South (Building Construction - Building 3 + Building Construction - Building 4 + Architectural Coating - Building 4 + Building Construction - Building 5 + Architectural Coating - Building 5 + Paving)	<u>27.9</u>	<u>26.1</u>	<u>85.7</u>	<u>0.3</u>	<u>16.4</u>	<u>4.4</u>
Lower South (Building Construction - Building 6 + Architectural Coating - Building 6 + Building Construction - Building 7 + Architectural Coating - Building 7 + Building Construction - Building 8 + Architectural Coating - Building 8 + Building Construction - Building 9 + Architectural Coating - Building 9 + Paving)	<u>14.0</u>	<u>34.2</u>	<u>121.8</u>	<u>0.4</u>	<u>18.0</u>	<u>4.9</u>
North (Building Construction - Building 1 + Architectural Coating - Building 1 + Building Construction - Building 2)	<u>4.0</u>	<u>23.9</u>	<u>97.7</u>	<u>0.3</u>	<u>15.4</u>	<u>4.1</u>
West (Building Construction - Building -10 + Paving)	<u>0.6</u>	<u>5.9</u>	<u>29.7</u>	<u>0.1</u>	<u>2.7</u>	<u>0.7</u>
Subtotal	<u>46.5</u>	<u>90.1</u>	<u>335.0</u>	<u>1.0</u>	<u>52.5</u>	<u>14.1</u>
Foundations and Concurrent Construction on Remaining Sites						
Upper South (Building Construction - Building 3 + Architectural Coating - Building 3 + Building Construction - Building 4 + Building Construction - Building 5)	<u>6.7</u>	<u>29.3</u>	<u>107.7</u>	<u>0.3</u>	<u>17.3</u>	<u>4.6</u>
Lower South (Foundations + Building Construction - Building 6 + Building Construction - Building 7 + Building Construction - Building 8 + Building Construction - Building 9)	<u>6.2</u>	<u>91.00</u>	<u>641.1</u>	<u>0.5</u>	<u>44.9</u>	<u>12.6</u>
North (Building Construction - Building 1 + Architectural Coating - Building 1 + Building Construction - Building 2)	<u>4.0</u>	<u>23.9</u>	<u>97.7</u>	<u>0.3</u>	<u>15.4</u>	<u>4.1</u>
West (Building Construction - Building -10 + Paving)	<u>0.6</u>	<u>5.9</u>	<u>29.7</u>	<u>0.1</u>	<u>2.7</u>	<u>0.7</u>
Subtotal	<u>17.5</u>	<u>150.0</u>	<u>876.4</u>	<u>1.1</u>	<u>80.3</u>	<u>22.1</u>
Grading on Four Sites						
Upper South (Grading)	<u>1.3</u>	<u>39.2</u>	<u>40.2</u>	<u>0.3</u>	<u>8.2</u>	<u>2.5</u>
Lower South (Grading)	<u>1.6</u>	<u>51.4</u>	<u>48.1</u>	<u>0.4</u>	<u>11.0</u>	<u>3.3</u>
North (Grading)	<u>1.7</u>	<u>51.7</u>	<u>50.5</u>	<u>0.4</u>	<u>13.4</u>	<u>4.6</u>
West (Grading)	<u>0.6</u>	<u>16.3</u>	<u>21.1</u>	<u>0.1</u>	<u>3.6</u>	<u>1.1</u>
Subtotal	<u>5.3</u>	<u>158.5</u>	<u>159.8</u>	<u>1.1</u>	<u>36.2</u>	<u>11.4</u>

TABLE IV.A-18

ESTIMATED MAXIMUM MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR MAXIMUM OVERLAPPING OF CONSTRUCTION (POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM10 ^b	PM2.5 ^b
Architectural Coating and Overlapping Phases on Four Sites						
Upper South (Building Construction - Building 3 + Building Construction - Building 4 + Architectural Coating - Building 4 + Building Construction - Building 5 + Architectural Coating - Building 5 + Paving)	<u>27.9</u>	<u>26.1</u>	<u>85.7</u>	<u>0.3</u>	<u>16.4</u>	<u>4.4</u>
Lower South (Building Construction - Building 6 + Architectural Coating - Building 6 + Building Construction - Building 7 + Architectural Coating - Building 7 + Building Construction - Building 8 + Architectural Coating - Building 8 + Building Construction - Building 9 + Architectural Coating - Building 9 + Paving)	<u>14.0</u>	<u>34.2</u>	<u>121.8</u>	<u>0.4</u>	<u>18.0</u>	<u>4.9</u>
North (Building Construction - Building 2 + Architectural Coating - Building 2 + Paving)	<u>14.9</u>	<u>12.5</u>	<u>68.5</u>	<u>0.2</u>	<u>13.9</u>	<u>3.6</u>
West (Building Construction - Building 10 + Architectural Coating - Building 10)	<u>4.2</u>	<u>4.8</u>	<u>16.4</u>	<u><0.1</u>	<u>2.5</u>	<u>0.7</u>
Subtotal	<u>61.1</u>	<u>77.6</u>	<u>292.4</u>	<u>0.9</u>	<u>50.8</u>	<u>13.5</u>
Maximum Daily Emissions	<u>61.1</u>	<u>158.5</u>	<u>876.4</u>	<u>1.1</u>	<u>80.3</u>	<u>22.1</u>
SCAQMD Thresholds of Significance	<u>75</u>	<u>100</u>	<u>550</u>	<u>150</u>	<u>150</u>	<u>55</u>
Exceeds Thresholds?	<u>No</u>	<u>Yes</u>	<u>Yes</u>	<u>No</u>	<u>No</u>	<u>No</u>

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2023. Updated in May 2024.

35. Pages IV.A-85, Subsection 3.d), Threshold (b)(3)(b), *Operations*, delete the 1st sentence of the 1st partial paragraph as follows:

~~However, CO emissions from construction activities that would overlap with the interim operations of the Project would exceed the SCAQMD regional significance threshold with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2. As shown in Table IV.A-20, implementation of Mitigation Measure AQ-MM-3 would reduce regional VOC emissions associated with the testing of the emergency generators, implementation of Mitigation Measure AQ-MM-4 would reduce VOC emissions from landscaping equipment and implementation of Mitigation Measure AQ-MM-5 would reduce VOC emissions associated with coating activities during operations. Thus, VOC emissions would be reduced to below the SCAQMD regional significance threshold during Project operations.~~

36. Pages IV.A-85 and IV.A-86, Subsection 3.d), Threshold (b)(3)(b), *Operations*, revise Table IV.A-19 as follows:

TABLE IV.A-19
ESTIMATED MAXIMUM MITIGATED REGIONAL INTERIM OPERATIONAL EMISSIONS AND
CONCURRENT CONSTRUCTION OF THE REMAINING BUILDINGS – PROJECT (POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Existing						
Area	9	0	0	0	0	0
Energy (Natural Gas)	<1	2	2	<1	<1	<1
Motor Vehicles	4	79	42	<1	13	4
Delivery Truck TRUs	16	160	195	<1	5	5
Emergency Generators	1	11	10	<1	<1	<1
Total Existing	29	252	250	<1	18	9
Project Interim Operations						
Area (Consumer Products, Architectural Coating)	~~47~~ <u>22</u>	0	0	0	0	0
Motor Vehicles	~~44~~ <u>9</u>	~~46~~ <u>13</u>	~~404~~ <u>83</u>	<1	~~30~~ <u>24</u>	~~8~~ <u>6</u>
Emergency Generators	~~3~~ <u>2</u>	~~40~~ <u>50</u>	~~23~~ <u>29</u>	<1	<1	<1
Charbroilers	<1	-	-	-	1	1
Cooling Towers	-	-	-	-	<1	<1
Project Overlapping Construction						
Foundations + Building Construction - Building 3 + Building Construction - Building 4 + Building Construction - Building 5	~~8~~ <u>4</u>	~~402~~ <u>70</u>	~~574~~ <u>516</u>	<1	~~44~~ <u>40</u>	~~42~~ <u>11</u>
Foundations + Building Construction - Building 6 + Building Construction - Building 7 + Building Construction - Building 8 + Building Construction – Building 9	~~6~~ <u>4</u>	~~44~~ <u>24</u>	~~428~~ <u>98</u>	<1	~~46~~ <u>15</u>	~~5~~ <u>4</u>
Building Construction – Building 10 + Paving	~~2~~ <u>1</u>	~~47~~ <u>6</u>	~~50~~ <u>30</u>	<1	3	1
Total Project (Interim Conditions)	~~47~~ <u>43</u>	~~245~~ <u>162</u>	~~876~~ <u>755</u>	1	~~94~~ <u>83</u>	~~26~~ <u>23</u>
Net Increase (Interim Conditions)						
Area (Coating, Consumer Products, Landscaping)	~~8~~ <u>14</u>	0	0	0	0	0
Energy	<1	-2	-2	<1	<1	<1
Mobile	~~8~~ <u>6</u>	~~63~~ <u>66</u>	~~62~~ <u>41</u>	<1	~~47~~ <u>11</u>	~~4~~ <u>2</u>
Emergency Generators	~~2~~ <u>2</u>	~~29~~ <u>39</u>	~~43~~ <u>18</u>	<1	<1	<1
Charbroilers	<1	-	-	-	1	<1

TABLE IV.A-19
ESTIMATED MAXIMUM MITIGATED REGIONAL INTERIM OPERATIONAL EMISSIONS AND
CONCURRENT CONSTRUCTION OF THE REMAINING BUILDINGS – PROJECT (POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Cooling Towers	-	-	-	-	<1	<1
Construction						
Foundations + Building Construction - Building 3 + Building Construction - Building 4 + Building Construction - Building 5	8 <u>4</u>	402 <u>70</u>	574 <u>516</u>	<1	44 <u>40</u>	42 <u>11</u>
Foundations + Building Construction - Building 6 + Building Construction - Building 7 + Building Construction - Building - Building 8 + Building Construction – Building 9	6 <u>4</u>	44 <u>24</u>	428 <u>98</u>	<1	46 <u>15</u>	5 <u>4</u>
Building Construction – Building 10 + Paving	2 <u>1</u>	47 <u>6</u>	50 <u>30</u>	<1	3	1
Delivery Truck TRUs	-16	-160	- 196 <u>5</u>	<1	-5	-5
Net Total Regional Emissions (Interim Conditions)	19 <u>15</u>	-37 <u>90</u>	~~626~~ 506	4 <u><1</u>	72 <u>65</u>	47 <u>14</u>
SCAQMD Thresholds of Significance	55	55	550	150	150	55
Exceeds Thresholds?	No	No	~~Yes~~ No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.

^b Area source VOC emissions are primarily emitted by consumer product usage as estimated in CalEEMod.

SOURCE: ESA, 2023. Updated in May 2024.

37. Page IV.A-87, Subsection 3.d), Threshold (b)(3)(b), *Operations*, revise Table IV.A-20 as follows:

See revised Table IV.A-20 on the following page.

TABLE IV.A-20
ESTIMATED MAXIMUM MITIGATED REGIONAL OPERATIONAL EMISSIONS – PROJECT (POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Existing						
Area	9	0	0	0	0	0
Energy (Natural Gas)	<1	2	2	<1	<1	<1
Motor Vehicles	4	79	42	<1	13	4
Delivery Truck TRUs	16	160	195	<1	5	5
Emergency Generators	1	11	10	<1	<1	<1
Total Existing	29	252	250	<1	18	9
Project						
Area (Consumer Products, Architectural Coating)	51	0	0	0	0	0
Motor Vehicles	~~22~~ <u>24</u>	~~30~~ <u>33</u>	~~199~~ <u>220</u>	1	~~64~~ <u>71</u>	~~16~~ <u>18</u>
Emergency Generators	3	50	29	<1	<1	<1
Charbroilers	1	-	-	-	2	1
Cooling Towers	-	-	-	-	<1	<1
Total Project	~~76~~ <u>79</u>	~~80~~ <u>83</u>	~~227~~ <u>248</u>	1	~~66~~ <u>73</u>	~~18~~ <u>19</u>
Net Increase						
Area (Coating, Consumer Products, Landscaping)	43	0	0	0	0	0
Energy	<1	-2	-2	<1	<1	<1
Mobile	~~48~~ <u>21</u>	~~49~~ <u>46</u>	~~157~~ <u>178</u>	<1	~~54~~ <u>58</u>	~~12~~ <u>14</u>
Emergency Generators	2	39	18	<1	<1	<1
Charbroilers	1	-	-	-	2	1
Cooling Towers	-	-	-	-	<1	<1
Delivery Truck TRUs	-16	-160	-195	<1	-5	-5
Net Total Regional Emissions	~~48~~ <u>50</u>	~~172~~ <u>-169</u>	~~22~~ <u>1</u>	<1	~~48~~ <u>55</u>	~~9~~ <u>11</u>
SCAQMD Thresholds of Significance	55	55	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of this Final EIR for air quality calculations associated with the Project with design modifications.

^b Area source VOC emissions are primarily emitted by consumer product usage as estimated in CalEEMod.

SOURCE: ESA, 2023. Updated in May 2024.

38. Page IV.A-87 and IV.A-88, Subsection 3.d), Threshold (b)(3)(b), *Operations*, revise the bottom paragraph on page IV.87 and continuing on page IV.A-88 as follows:

The Project would result in potentially significant operational impacts due to regional VOC and NO_x emissions above the regional significance thresholds. During interim operations, Mitigation Measures AQ-MM-1 and AQ-MM-2 would be required to reduce overlapping construction-related NO_x emissions that would be concurrent with the interim regional operational emissions. Mitigation Measure AQ-MM-3 would reduce regional NO_x emissions from operations by scheduling routine maintenance of emergency generators so that only one emergency generator is maintained on any given day. Mitigation Measure AQ-MM-4 would further reduce regional NO_x emissions from operations by requiring only electric landscaping equipment be used on the Project Site. With implementation of AQ-MM-1, AQ-MM-2, AQ-MM-3 and AQ-MM-4, NO_x emissions would be reduced to below the SCAQMD regional significance threshold from construction activities that would overlap with the interim operations of the Project. ~~However, emissions of CO from construction activities that would overlap with the interim operations of the Project would now exceed the SCAQMD regional significance threshold due to the Tier 4 Final equipment and CNG truck engine technology where the technology used to reduce NO_x emissions leads to slightly higher CO emissions. As stated above, this is the result of NO_x being formed through high combustion temperatures whereas CO is formed through incomplete combustion from lower combustion temperatures. CO is a pollutant of lesser air quality concern as compared to NO_x given that the Air Basin is in attainment for CO but is in non-attainment for ozone, with NO_x constituting an ozone precursor emission. Thus, AQ-MM-1 and AQ-MM-2 represent overall environmentally beneficial mitigation measures as they would reduce emissions of an ozone precursor, NO_x, despite increasing emissions of CO during Project construction activities that would be concurrent with the interim regional operational emissions.~~

Therefore, while NO_x impacts related to overlapping construction and interim operational emissions would be mitigated to less than significant with implementation of mitigation measures, CO impacts related to regional emissions during this overlapping short-term timeframe would be significant and unavoidable after implementation of mitigation measures.

39. Page IV.A-89, Subsection 3.d), Threshold (c)(1)(b), *Localized Construction*, remove the 1st sentence of the 2nd full paragraph as follows:

~~Project-level net localized construction emissions would be mitigated to below the SCAQMD localized significance thresholds. Therefore, construction impacts would be mitigated to less than significant.~~

40. Page IV.A-96, Subsection 3.d), Threshold (c)(1)(b), *Localized Operations*, remove the 1st full paragraph as follows:

~~Project-level net localized construction emissions would be mitigated to below the SCAQMD localized significance thresholds. Therefore, operational impacts would be mitigated to a less than significant level.~~

41. Page IV.A-96, Subsection 3.d), Threshold (c)(1)(b), *Localized Operations*, revise Table IV.A-26 as follows:

TABLE IV.A-26
ESTIMATED MAXIMUM LOCALIZED OPERATIONAL EMISSIONS – PROJECT (POUNDS PER DAY) ^a

Source	NO _x	CO	PM ₁₀	PM _{2.5}
Existing				
Area	0	0	0.0	0.0
Energy (Natural Gas)	2	2	0.2	0.2
Emergency Generators	11	10	<0.1	<0.1
Total Existing	13	12	0.2	0.2
Project				
Area (Landscaping)	2	~~476~~ <u>177</u>	0.2	0.1
Emergency Generators	220	126	0.9	0.9
Charbroilers	-	-	1.7	1.0
Cooling Towers	-	-	0.1	<0.1
Total Project	221	302	2.9	2.1
Net Increase				
Area (Landscaping)	2	~~476~~ <u>177</u>	0.2	0.1
Energy	-2	-2	-0.2	-0.2
Emergency Generators	208	115	0.9	0.9
Charbroilers	-	-	1.7	1.0
Cooling Towers	-	-	0.1	<0.1
	208	~~290~~ <u>291</u>	2.7	1.9
Net Total Regional Emissions				
SCAQMD Thresholds of Significance	161	1,861	4.0	2.0
Exceeds Thresholds?	Yes	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.

^b Area source VOC emissions are primarily emitted by consumer product usage as estimated in CalEEMod.

^c The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 5-acre site with sensitive receptors conservatively assumed to be 25 meters to the Project Site. The Project Site is 7.6 acres and conservatively uses the 5-acre screening criteria.

SOURCE: ESA, 2023. Updated in May 2024.

42. Page IV.A-97, Subsection 3.d), Threshold (c)(1)(c), *Carbon Monoxide Hotspots*, revise footnote as follows:

¹⁰² Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of the Project's Draft EIR; see Appendix F of the Final EIR for the traffic volumes associated with the Project design modifications.

43. Page IV.A-97, Subsection 3.d), Threshold (c)(1)(c), *Carbon Monoxide Hotspots*, revise the 1st sentence of the last paragraph and footnote as follows:

Based on the Project's TA,¹⁰² under Future plus Project (2030) conditions, the intersection of Alameda Street and 3rd Street/4th Place would have a maximum traffic volume of approximately ~~63,320~~ 63,420 average daily trips (ADT).¹⁰³

¹⁰³ The traffic volume of approximately ~~63,320~~ 63,420 ADT was estimated based on the peak hour intersection volumes under future with Project conditions and the general assumption that peak hour trips represent approximately 10 percent of daily trip volumes (the Federal Highway Administration considers 10 percent to be a standard assumption; see Travel Model Improvement Program Time-of-Day Modeling Procedures: State-of-the-Practice, State-of-the-Art (2.0 Standard Approaches, http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm).

44. Page IV.A-100, Subsection 3.d), Threshold (c)(1)(d), *Operations*, revise the 1st sentence of the 3rd full paragraph as follows:

With respect to the use of consumer products and architectural coatings, the residential, office, ~~hotel~~, restaurant, and retail uses associated with the Project would be expected to generate minimal emissions from these sources.

45. Page IV.A-101, Subsection 3.d), Threshold (c)(1)(e), *Conclusion*, revise the paragraph as follows:

Based on the above, construction of the Project could expose sensitive receptors to a substantial pollutant concentration and impacts would be potentially significant before implementation of mitigation measures. Operation of the Project ~~would not expose sensitive receptors to substantial pollutant concentrations, and impacts during Project operation would be less than significant.~~ could expose sensitive receptors to a substantial pollutant concentration, and impacts would be potentially significant.

46. Pages IV.A-102 to IV.A-107, Subsection 3.d), Threshold (c)(3)(a), Construction, revise and update Tables IV.A-27 to IV.A-31 as shown below. For ease of reviewing the changes, the tables are fully shown in strikethrough text and reproduced with the updated numbers in double underline as shown below.

TABLE IV.A-27
~~ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR THE NORTH SITE~~
(POUNDS PER DAY)^a

Source	NO_x	CO	PM10^b	PM2.5^b
Construction Phases				
Demolition	40.0	28.6	0.5	0.3
Site Preparation	4.4	12.7	2.8	1.4
Grading	5.8	28.0	3.0	1.5
Building Construction – Building 1	40.2	33.0	0.3	0.3
Foundations	9.4	26.4	0.3	0.2
Building Construction – Building 2	12.7	34.9	0.3	0.3
Architectural Coating – Building 1	4.4	4.5	<0.1	<0.1
Architectural Coating – Building 2	4.4	4.5	<0.1	<0.1
Paving	4.4	18.3	0.4	0.4
Overlapping Phases				
Demolition + Site Preparation	44.4	41.3	3.3	1.7
Foundations + Building Construction – Building 1 + Building Construction – Building 2	32.0	94.0	0.9	0.9
Building Construction – Building 1 + Architectural Coating – Building 1 + Building Construction – Building 2	24.4	69.3	0.7	0.6
Building Construction – Building 2 + Architectural Coating – Building 2	13.4	36.3	0.3	0.3
Building Construction – Building 2 + Architectural Coating – Building 2 + Paving	17.4	54.6	0.4	0.4
Maximum Daily Emissions	32.0	94.0	3.3	1.7
SCAQMD Thresholds of Significance	85.2	1,052.1	18.5	5.7
Exceeds Thresholds?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source-Receptor Area 1 (Central Los Angeles County) for a 1.35-acre site with sensitive receptors conservatively assumed to be 50 meters to the construction area.

SOURCE: ESA, 2023.

TABLE IV.A-28
~~ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR THE~~
~~LOWER SOUTH SITE~~
~~(POUNDS PER DAY)^a~~

Source	NO_x	CO	PM₁₀^b	PM_{2.5}^b
Construction Phases				
Demolition	10.0	28.6	0.9	0.4
Site Preparation	2.6	28.3	7.8	4.0
Grading	5.1	24.6	0.4	0.2
Parking Garage Construction	9.4	19.8	0.3	0.2
Foundations	27.3	105.3	0.9	0.9
Building Construction – Building 6	12.5	34.8	0.3	0.3
Building Construction – Building 7	9.4	19.8	0.3	0.2
Building Construction – Building 8	9.4	19.8	0.3	0.2
Building Construction – Building 9	10.1	32.9	0.3	0.3
Architectural Coating – Building 6	1.1	1.5	<0.1	<0.1
Architectural Coating – Building 7	1.1	1.5	<0.1	<0.1
Architectural Coating – Building 8	1.1	1.5	<0.1	<0.1
Architectural Coating – Building 9	1.1	1.5	<0.1	<0.1
Paving	4.1	18.3	0.1	0.1
Overlapping Phases				
Demolition + Site Preparation	12.6	56.9	8.7	4.4
Grading + Parking Garage Construction	14.5	44.3	0.6	0.4
Foundations + Building Construction – Building 6 + Building Construction – Building 7 + Building Construction – Building 8 + Building Construction – Building 9	68.7	212.6	2.0	1.9
Building Construction – Building 6 + Architectural Coating – Building 6 + Building Construction – Building 7 + Architectural Coating – Building 7 + Building Construction – Building 8 + Architectural Coating – Building 8 + Building Construction – Building 9 + Architectural Coating – Building 9	45.8	113.3	1.2	1.1
Building Construction – Building 6 + Architectural Coating – Building 6 + Building Construction – Building 7 + Architectural Coating – Building 7 + Building Construction – Building 8 + Architectural Coating – Building 8 + Building Construction – Building 9 + Architectural Coating – Building 9 + Paving	49.2	131.4	1.2	1.2
Maximum Daily Emissions	68.7	212.6	8.7	4.4
SCAQMD Thresholds of Significance	130.8	1,836.7	37.2	8.9
Exceeds Thresholds?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 3.46-acre site with sensitive receptors conservatively assumed to be 50 meters to the construction area.

SOURCE: ESA, 2023.

TABLE IV.A-29
~~ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR THE UPPER SOUTH SITE~~
(POUNDS PER DAY)^a

Source	NO_x	CO	PM₁₀^b	PM_{2.5}^b
Construction Phases				
Demolition	10.0	28.6	0.7	0.4
Site Preparation	1.4	15.3	0.7	0.1
Grading	5.1	24.6	0.4	0.2
Parking Garage Construction	6.8	16.2	0.2	0.2
Foundations	16.1	52.9	0.5	0.5
Building Construction – Building 3	9.4	19.8	0.3	0.2
Building Construction – Building 4	9.4	19.8	0.3	0.2
Building Construction – Building 5	6.8	16.2	0.2	0.2
Architectural Coating – Building 3	1.1	1.5	<0.1	<0.1
Architectural Coating – Building 4	1.1	1.5	<0.1	<0.1
Architectural Coating – Building 5	1.1	1.5	<0.1	<0.1
Paving	4.1	18.3	0.1	0.1
Overlapping Phases				
Demolition + Site Preparation	11.3	43.9	1.4	0.5
Grading + Parking Garage Construction	11.8	40.7	0.6	0.4
Foundations + Building Construction – Building 3 + Building Construction – Building 4 + Building Construction – Building 5	41.7	108.6	1.3	1.2
Building Construction – Building 3 + Architectural Coating – Building 3 + Building Construction – Building 4 + Building Construction – Building 5	26.7	57.2	0.8	0.7
Building Construction – Building 3 + Building Construction – Building 4 + Architectural Coating – Building 4 + Building Construction – Building 5 + Architectural Coating – Building 5 + Paving	31.4	76.9	0.8	0.8
Maximum Daily Emissions	41.7	108.6	1.4	1.2
SCAQMD Thresholds of Significance	114.8	1,534.9	29.3	7.7
Exceeds Thresholds?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 2.52-acre site with sensitive receptors conservatively assumed to be 50 meters to the construction area.

SOURCE: ESA, 2023.

TABLE IV.A-30
ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR THE WEST SITE
(POUNDS PER DAY)^a

Source	NO _x	CO	PM10 ^b	PM2.5 ^b
Construction Phases				
Demolition	6.6	20.4	0.3	0.2
Site Preparation	0.4	6.0	0.2	0.0
Grading	3.5	17.3	0.1	0.1
Foundations	22.0	81.3	0.8	0.8
Building Construction – Building 10	9.7	19.8	0.3	0.3
Architectural Coating – Building 10	1.1	1.5	<0.1	<0.1
Paving	4.5	22.3	0.2	0.1
Overlapping Phases				
Demolition + Site Preparation	10.6	43.7	0.7	0.4
Foundations + Building Construction – Building 10	31.7	101.1	1.1	1.1
Building Construction – Building 10 + Paving	14.0	42.1	0.4	0.4
Building Construction – Building 10 + Architectural Coating – Building 10	10.7	21.3	0.3	0.3
Maximum Daily Emissions	31.7	101.1	1.1	1.1
SCAQMD Thresholds of Significance	50.9	429.8	3.0	1.6
Exceeds Thresholds?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 0.32-acre site with sensitive receptors conservatively assumed to be 25 meters to the construction area.

SOURCE: ESA, 2023.

TABLE IV.A-31**~~ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR MAXIMUM OVERLAPPING OF CONSTRUCTION (POUNDS PER DAY)^a~~**

Source	NO_x	CO	PM10^b	PM2.5^b
Overall Construction (Excluding Foundations)				
Upper South (~~Building Construction – Building 3 + Building Construction – Building 4 + Architectural Coating – Building 4 + Building Construction – Building 5 + Architectural Coating – Building 5 + Paving~~)	31.45	76.91	0.84	0.78
Lower South (~~Building Construction – Building 6 + Architectural Coating – Building 6 + Building Construction – Building 7 + Architectural Coating – Building 7 + Building Construction – Building 8 + Architectural Coating – Building 8 + Building Construction – Building 9 + Architectural Coating – Building 9 + Paving~~)	49.2	131.4	1.2	1.2
North (~~Building Construction – Building 1 + Architectural Coating – Building 1 + Building Construction – Building 2~~)	24.1	69.3	0.7	0.6
West (~~Building Construction – Building 10 + Paving~~)	14.0	42.1	0.4	0.4
Subtotal	118.7	319.8	3.2	3.0
Foundations and Concurrent Construction on Remaining Sites				
Upper South (~~Building Construction – Building 3 + Architectural Coating – Building 3 + Building Construction – Building 4 + Building Construction – Building 5~~)	26.7	57.2	0.8	0.7
Lower South (~~Foundations + Building Construction – Building 6 + Building Construction – Building 7 + Building Construction – Building 8 + Building Construction – Building 9~~)	68.7	212.6	2.0	1.9
North (~~Building Construction – Building 1 + Architectural Coating – Building 1 + Building Construction – Building 2~~)	24.1	69.3	0.7	0.6
West (~~Building Construction – Building 10 + Paving~~)	14.0	42.1	0.4	0.4
Subtotal	133.4	381.3	3.9	3.7
Grading on Four Sites				
Upper South (Grading)	5.1	24.6	0.4	0.2
Lower South (Grading)	5.1	24.6	0.4	0.2
North (Grading)	5.8	28.0	3.0	1.5
West (Grading)	3.5	17.3	0.1	0.1
Subtotal	19.7	94.5	3.9	2.1

TABLE IV.A-31**~~ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR MAXIMUM OVERLAPPING OF CONSTRUCTION (POUNDS PER DAY)^a~~**

Source	NO_x	CO	PM10^b	PM2.5^b
Architectural Coating and Overlapping Phases on Four Sites				
Upper South (Building Construction – Building 3 + Building Construction – Building 4 + Architectural Coating – Building 4 + Building Construction – Building 5 + Architectural Coating – Building 5 + Paving)	31.4	76.9	0.8	0.8
Lower South (Building Construction – Building 6 + Architectural Coating – Building 6 + Building Construction – Building 7 + Architectural Coating – Building 7 + Building Construction – Building 8 + Architectural Coating – Building 8 + Building Construction – Building 9 + Architectural Coating – Building 9 + Paving)	49.2	131.4	1.2	1.2
North (Building Construction – Building 2 + Architectural Coating – Building 2 + Paving)	17.4	54.6	0.4	0.4
West (Building Construction – Building 10 + Architectural Coating – Building 10)	10.7	21.3	0.3	0.3
Subtotal	108.8	284.2	2.8	2.6
Maximum Daily Emissions	133.4	381.3	3.9	3.7
SCAQMD Thresholds of Significance	161.0	1,861.0	16.0	8.0
Exceeds Thresholds?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 5-acre site with sensitive receptors conservatively assumed to be 25 meters to the construction area. The Project Site is 7.6 acres and conservatively uses the 5-acre screening criteria.

SOURCE: ESA, 2023.

TABLE IV.A-27
ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR THE NORTH SITE
(POUNDS PER DAY) ^a

Source	NO _x	CO	PM10 ^b	PM2.5 ^b
Construction Phases				
Demolition	<u>3.3</u>	<u>19.1</u>	<u>0.3</u>	<u>0.1</u>
Site Preparation	<u>0.7</u>	<u>6.7</u>	<u>2.8</u>	<u>1.4</u>
Grading	<u>3.1</u>	<u>21.2</u>	<u>2.8</u>	<u>1.4</u>
Foundations	<u>1.3</u>	<u>14.7</u>	<u>0.1</u>	<u>0.1</u>
Building Construction - Building 1	<u>3.7</u>	<u>21.2</u>	<u>0.1</u>	<u>0.1</u>
Building Construction - Building 2	<u>3.3</u>	<u>18.1</u>	<u>0.1</u>	<u>0.1</u>
Architectural Coating - Building 1	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 2	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Paving	<u>1.1</u>	<u>13.0</u>	<u><0.1</u>	<u><0.1</u>
Overlapping Phases				
Demolition + Site Preparation	<u>4.0</u>	<u>25.8</u>	<u>3.0</u>	<u>1.5</u>
Foundations + Building Construction - Building 1 + Building Construction - Building 2	<u>8.3</u>	<u>54.0</u>	<u>0.2</u>	<u>0.2</u>
Building Construction - Building 1 + Architectural Coating - Building 1 + Building Construction - Building 2	<u>7.0</u>	<u>39.3</u>	<u>0.2</u>	<u>0.2</u>
Building Construction - Building 2 + Architectural Coating - Building 2	<u>3.3</u>	<u>18.1</u>	<u>0.1</u>	<u>0.1</u>
Building Construction - Building 2 + Architectural Coating - Building 2 + Paving	<u>4.4</u>	<u>31.1</u>	<u>0.1</u>	<u>0.1</u>
Maximum Daily Emissions	<u>8.3</u>	<u>54.0</u>	<u>3.0</u>	<u>1.5</u>
SCAQMD Thresholds of Significance	<u>85.2</u>	<u>1,052.1</u>	<u>18.5</u>	<u>5.7</u>
Exceeds Thresholds?	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

^a Totals may not add up exactly due to rounding in the modeling calculations. ~~Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.~~

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 1.35-acre site with sensitive receptors conservatively assumed to be 50 meters to the construction area.

SOURCE: ESA, 2023. Updated in May 2024.

TABLE IV.A-28
ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR THE
LOWER SOUTH SITE
(POUNDS PER DAY) ^a

Source	NO _x	CO	PM10 ^b	PM2.5 ^b
Construction Phases				
Demolition	<u>3.3</u>	<u>19.1</u>	<u>0.7</u>	<u>0.2</u>
Site Preparation	<u>2.5</u>	<u>26.3</u>	<u>7.8</u>	<u>4.0</u>
Grading	<u>2.7</u>	<u>18.0</u>	<u>0.3</u>	<u>0.1</u>
Parking Garage Construction	<u>2.0</u>	<u>8.6</u>	<u><0.1</u>	<u><0.1</u>
Foundations	<u>13.3</u>	<u>79.9</u>	<u>0.4</u>	<u>0.4</u>
Building Construction - Building 6	<u>3.3</u>	<u>18.1</u>	<u>0.1</u>	<u>0.1</u>
Building Construction - Building 7	<u>2.0</u>	<u>8.6</u>	<u><0.1</u>	<u><0.1</u>
Building Construction - Building 8	<u>2.0</u>	<u>8.6</u>	<u><0.1</u>	<u><0.1</u>
Building Construction - Building 9	<u>3.7</u>	<u>21.2</u>	<u>0.1</u>	<u>0.1</u>
Architectural Coating - Building 6	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 7	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 8	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 9	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Paving	<u>1.1</u>	<u>13.0</u>	<u><0.1</u>	<u><0.1</u>
Overlapping Phases				
Demolition + Site Preparation	<u>5.8</u>	<u>45.3</u>	<u>8.4</u>	<u>4.2</u>
Grading + Parking Garage Construction	<u>4.7</u>	<u>26.6</u>	<u>0.3</u>	<u>0.1</u>
Foundations + Building Construction - Building 6 + Building Construction - Building 7 + Building Construction - Building 8 + Building Construction - Building 9	<u>24.4</u>	<u>136.5</u>	<u>0.6</u>	<u>0.6</u>
Building Construction - Building 6 + Architectural Coating - Building 6 + Building Construction - Building 7 + Architectural Coating - Building 7 + Building Construction - Building 8 + Architectural Coating - Building 8 + Building Construction - Building 9 + Architectural Coating - Building 9	<u>11.1</u>	<u>56.6</u>	<u>0.2</u>	<u>0.2</u>
Building Construction - Building 6 + Architectural Coating - Building 6 + Building Construction - Building 7 + Architectural Coating - Building 7 + Building Construction - Building 8 + Architectural Coating - Building 8 + Building Construction - Building 9 + Architectural Coating - Building 9 + Paving	<u>12.2</u>	<u>69.5</u>	<u>0.3</u>	<u>0.3</u>
Maximum Daily Emissions	<u>24.4</u>	<u>136.5</u>	<u>8.4</u>	<u>4.2</u>
SCAQMD Thresholds of Significance	<u>130.8</u>	<u>1,836.7</u>	<u>37.2</u>	<u>8.9</u>
Exceeds Thresholds?	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

^a Totals may not add up exactly due to rounding in the modeling calculations. ~~Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.~~

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 3.46-acre site with sensitive receptors conservatively assumed to be 50 meters to the construction area.

SOURCE: ESA, 2023- Updated in May 2024.

TABLE IV.A-29
ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR THE UPPER SOUTH SITE
(POUNDS PER DAY) ^a

Source	NO _x	CO	PM10 ^b	PM2.5 ^b
Construction Phases				
Demolition	<u>3.3</u>	<u>19.1</u>	<u>0.4</u>	<u>0.1</u>
Site Preparation	<u>0.9</u>	<u>9.3</u>	<u>0.7</u>	<u>0.1</u>
Grading	<u>2.7</u>	<u>18.0</u>	<u>0.3</u>	<u>0.1</u>
Parking Garage Construction	<u>2.0</u>	<u>8.0</u>	<u>0.1</u>	<u>0.1</u>
Foundations	<u>4.0</u>	<u>28.5</u>	<u>0.2</u>	<u>0.2</u>
Building Construction - Building 3	<u>2.0</u>	<u>8.6</u>	<u><0.1</u>	<u><0.1</u>
Building Construction - Building 4	<u>2.0</u>	<u>8.6</u>	<u><0.1</u>	<u><0.1</u>
Building Construction - Building 5	<u>2.0</u>	<u>8.0</u>	<u>0.1</u>	<u>0.1</u>
Architectural Coating - Building 3	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 4	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Architectural Coating - Building 5	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Paving	<u>1.1</u>	<u>13.0</u>	<u><0.1</u>	<u><0.1</u>
Overlapping Phases				
Demolition + Site Preparation	<u>4.3</u>	<u>28.4</u>	<u>1.1</u>	<u>0.2</u>
Grading + Parking Garage Construction	<u>4.6</u>	<u>26.0</u>	<u>0.3</u>	<u>0.1</u>
Foundations + Building Construction - Building 3 + Building Construction - Building 4 + Building Construction - Building 5	<u>10.0</u>	<u>53.7</u>	<u>0.3</u>	<u>0.3</u>
Building Construction - Building 3 + Architectural Coating - Building 3 + Building Construction - Building 4 + Building Construction - Building 5	<u>6.0</u>	<u>25.2</u>	<u>0.1</u>	<u>0.1</u>
Building Construction - Building 3 + Building Construction - Building 4 + Architectural Coating - Building 4 + Building Construction - Building 5 + Architectural Coating - Building 5 + Paving	<u>7.1</u>	<u>38.2</u>	<u>0.2</u>	<u>0.2</u>
Maximum Daily Emissions	<u>10.0</u>	<u>53.7</u>	<u>1.1</u>	<u>0.3</u>
SCAQMD Thresholds of Significance	<u>114.8</u>	<u>1,534.9</u>	<u>29.3</u>	<u>7.7</u>
Exceeds Thresholds?	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

^a Totals may not add up exactly due to rounding in the modeling calculations. ~~Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.~~

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 2.52-acre site with sensitive receptors conservatively assumed to be 50 meters to the construction area.

SOURCE: ESA, 2023. Updated in May 2024.

TABLE IV.A-30
ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR THE WEST SITE
(POUNDS PER DAY) ^a

Source	NO _x	CO	PM10 ^b	PM2.5 ^b
Construction Phases				
Demolition	<u>0.9</u>	<u>10.1</u>	<u>0.2</u>	<u>0.1</u>
Site Preparation	<u>0.0</u>	<u>0.0</u>	<u>0.2</u>	<u><0.1</u>
Grading	<u>1.6</u>	<u>11.1</u>	<u><0.1</u>	<u><0.1</u>
Foundations	<u>8.0</u>	<u>55.6</u>	<u>0.3</u>	<u>0.3</u>
Building Construction - Building 10	<u>2.0</u>	<u>8.6</u>	<u><0.1</u>	<u><0.1</u>
Architectural Coating - Building 10	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
Paving	<u>1.1</u>	<u>13.0</u>	<u><0.1</u>	<u><0.1</u>
Overlapping Phases				
Demolition + Site Preparation	<u>2.5</u>	<u>21.1</u>	<u>0.4</u>	<u>0.1</u>
Foundations + Building Construction - Building 10	<u>10.1</u>	<u>64.2</u>	<u>0.4</u>	<u>0.3</u>
Building Construction - Building 10 + Paving	<u>3.1</u>	<u>21.6</u>	<u>0.1</u>	<u>0.1</u>
Building Construction - Building 10 + Architectural Coating - Building 10	<u>2.0</u>	<u>8.6</u>	<u><0.1</u>	<u><0.1</u>
Maximum Daily Emissions	<u>10.0</u>	<u>64.2</u>	<u>0.4</u>	<u>0.3</u>
SCAQMD Thresholds of Significance	<u>50.9</u>	<u>429.8</u>	<u>3.0</u>	<u>1.6</u>
Exceeds Thresholds?	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

^a Totals may not add up exactly due to rounding in the modeling calculations. ~~Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.~~

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 0.32-acre site with sensitive receptors conservatively assumed to be 25 meters to the construction area.

SOURCE: ESA, 2023. Updated in May 2024.

TABLE IV.A-31
ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR MAXIMUM OVERLAPPING
OF CONSTRUCTION (POUNDS PER DAY) ^a

Source	NO _x	CO	PM10 ^b	PM2.5 ^b
Overall Construction (Excluding Foundations)				
Upper South (Building Construction - Building 3 + Building Construction - Building 4 + Architectural Coating - Building 4 + Building Construction - Building 5 + Architectural Coating - Building 5 + Paving)	<u>7.1</u>	<u>38.2</u>	<u>0.2</u>	<u>0.2</u>
Lower South (Building Construction - Building 6 + Architectural Coating - Building 6 + Building Construction - Building 7 + Architectural Coating - Building 7 + Building Construction - Building 8 + Architectural Coating - Building 8 + Building Construction - Building 9 + Architectural Coating - Building 9 + Paving)	<u>12.2</u>	<u>69.5</u>	<u>0.3</u>	<u>0.3</u>
North (Building Construction - Building 1 + Architectural Coating - Building 1 + Building Construction - Building 2)	<u>7.0</u>	<u>39.3</u>	<u>0.2</u>	<u>0.2</u>
West (Building Construction - Building -10 + Paving)	<u>3.1</u>	<u>21.6</u>	<u>0.1</u>	<u>0.1</u>
Subtotal	<u>29.5</u>	<u>168.6</u>	<u>0.7</u>	<u>0.7</u>
Foundations and Concurrent Construction on Remaining Sites				
Upper South (Building Construction - Building 3 + Architectural Coating - Building 3 + Building Construction - Building 4 + Building Construction - Building 5)	<u>6.0</u>	<u>25.2</u>	<u>0.1</u>	<u>0.1</u>
Lower South (Foundations + Building Construction - Building 6 + Building Construction - Building 7 + Building Construction - Building 8 + Building Construction - Building 9)	<u>24.4</u>	<u>136.5</u>	<u>0.6</u>	<u>0.6</u>
North (Building Construction - Building 1 + Architectural Coating - Building 1 + Building Construction - Building 2)	<u>7.0</u>	<u>39.3</u>	<u>0.2</u>	<u>0.2</u>
West (Building Construction - Building -10 + Paving)	<u>3.1</u>	<u>21.6</u>	<u>0.1</u>	<u>0.1</u>
Subtotal	<u>40.5</u>	<u>222.6</u>	<u>1.0</u>	<u>1.0</u>
Grading on Four Sites				
Upper South (Grading)	<u>2.7</u>	<u>18.0</u>	<u>0.3</u>	<u>0.1</u>
Lower South (Grading)	<u>2.7</u>	<u>18.0</u>	<u>0.3</u>	<u>0.1</u>
North (Grading)	<u>3.1</u>	<u>21.2</u>	<u>2.8</u>	<u>1.4</u>
West (Grading)	<u>1.6</u>	<u>11.1</u>	<u><0.1</u>	<u><0.1</u>
Subtotal	<u>9.9</u>	<u>68.3</u>	<u>3.4</u>	<u>1.6</u>

TABLE IV.A-31
ESTIMATED MAXIMUM MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR MAXIMUM OVERLAPPING
OF CONSTRUCTION (POUNDS PER DAY) ^a

Source	NO _x	CO	PM10 ^b	PM2.5 ^b
Architectural Coating and Overlapping Phases on Four Sites				
Upper South (Building Construction - Building 3 + Building Construction - Building 4 + Architectural Coating - Building 4 + Building Construction - Building 5 + Architectural Coating - Building 5 + Paving)	<u>7.1</u>	<u>38.2</u>	<u>0.2</u>	<u>0.2</u>
Lower South (Building Construction - Building 6 + Architectural Coating - Building 6 + Building Construction - Building 7 + Architectural Coating - Building 7 + Building Construction - Building 8 + Architectural Coating - Building 8 + Building Construction - Building 9 + Architectural Coating - Building 9 + Paving)	<u>12.2</u>	<u>69.5</u>	<u>0.3</u>	<u>0.3</u>
North (Building Construction - Building 2 + Architectural Coating - Building 2 + Paving)	<u>4.4</u>	<u>31.1</u>	<u>0.1</u>	<u>0.1</u>
West (Building Construction - Building 10 + Architectural Coating - Building 10)	<u>2.0</u>	<u>8.6</u>	<u><0.1</u>	<u><0.1</u>
Subtotal	<u>25.8</u>	<u>147.4</u>	<u>0.6</u>	<u>0.6</u>
Maximum Daily Emissions	<u>40.5</u>	<u>222.6</u>	<u>3.4</u>	<u>1.6</u>
SCAQMD Thresholds of Significance	<u>161.0</u>	<u>1,861.0</u>	<u>16.0</u>	<u>8.0</u>
Exceeds Thresholds?	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

^a Totals may not add up exactly due to rounding in the modeling calculations. ~~Detailed emissions calculations are provided in Appendix B of this Draft EIR. See Appendix C of the Final EIR for air quality calculations associated with the Project with design modifications.~~

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a 5-acre site with sensitive receptors conservatively assumed to be 25 meters to the construction area. The Project Site is 7.6 acres and conservatively uses the 5-acre screening criteria.

SOURCE: ESA, 2023. Updated in May 2024.

47. Page IV.A-112, Subsection 3.e)(1)(b), *Project-Specific Impacts*, replace the 3rd to 5th full paragraphs as follows:

~~For construction, as shown in Tables IV.A-27 through IV.A-31, the Project would not result in an exceedance of localized significance thresholds with the implementation of Mitigation Measure AQ-MM-1. However, as shown in Tables IV.A-14 through Table IV.A-18, with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2, regional emissions of NO_x and CO for construction would still exceed the significance thresholds. Therefore, cumulative impacts related to regional NO_x and CO construction emissions would be significant and unavoidable.~~

~~For interim operations with concurrent construction activities, as shown in Tables IV.A-12 and Table IV.A-19, with implementation of Mitigation Measures AQ-MM-1, AQ-MM-2, AQ-MM-3, AQ-MM-4 and AQ-MM-5 regional emissions of CO for interim operations with~~

~~concurrent construction activities, would exceed the significance thresholds. Therefore, cumulative impacts related to regional CO operations emissions would be significant and unavoidable.~~

~~For operations, as shown in Table IV.A-26 and IV.A-32, the Project would not result in an exceedance of localized significance thresholds, and with implementation of Mitigation Measure AQ-MM-3, AQ-MM-4 and AQ-MM-5. In addition, as shown in Table IV.A-20, with implementation of Mitigation Measures AQ-MM-3, AQ-MM-4, AQ-MM-5, regional VOC emissions during Project operations would be reduced to below the regional threshold. Therefore, cumulative impacts related to operational regional and localized VOC emissions would be less than significant with mitigation.~~

Construction and operation of the Project, as well as during the interim operations with concurrent construction activities scenario, were determined to have a potentially significant impact prior to mitigation and as such, cumulative air quality impacts would also be potentially significant prior to mitigation.

48. Page IV.A-113, Subsection 33.e)(3) *Level of Significance After Mitigation*, revise the subsections as follows:

(a) *Construction*

For construction, as shown in Tables IV.A-27 through IV.A-31, the Project would not result in an exceedance of localized significance thresholds with the implementation of Mitigation Measure AQ-MM-1. However, as shown in Tables IV.A-14 through Table IV.A-18, with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2, regional emissions of NO_x and CO for construction would still exceed the significance thresholds. Thus, Cumulative cumulative air quality impacts would be significant and unavoidable for construction regional NO_x and CO emissions. Localized construction NO_x and PM_{2.5} emissions would be mitigated to less than significant. Therefore, when considered together with related projects, construction air quality impacts would result in a cumulatively considerable impact after mitigation.

(b) *Operations*

~~Cumulative air quality impacts would be mitigated to less than significant for regional and localized operational VOC and NO_x emissions with implementation of Mitigation Measure AQ-MM-3, AQ-MM-4 and AQ-MM-5. However, cumulative air quality impacts would be significant and unavoidable for interim operations with concurrent construction activities CO emissions. Therefore, when considered together with related projects, operations air quality impacts would result in a cumulatively considerable impact after mitigation.~~

For interim operations with concurrent construction activities, as shown in Table IV.A-19, with implementation of Mitigation Measures AQ-MM-1, AQ-MM-2, AQ-MM-3, AQ-MM-4 and AQ-MM-5 regional air quality emissions for interim operations with concurrent construction activities would not exceed the significance thresholds. Therefore, cumulative impacts related to regional air quality emissions would also be less than significant.

For operations, as shown in Table IV.A-32, the Project would not result in an exceedance of localized significance thresholds with implementation of Mitigation Measure AQ-MM-3, AQ-MM-4 and AQ-MM-5. In addition, as shown in Table IV.A-20, with implementation of Mitigation Measures AQ-MM-3, AQ-MM-4, AQ-MM-5, regional air emissions during Project operations would be below the regional thresholds. Therefore, cumulative impacts related to operational regional and localized VOC emissions would be less than significant with mitigation.

4. Chapter IV.B Cultural Resources

1. Page IV.B-37, Subsection 3.d), Threshold (a)(1)(b)(ii), *Historic Districts*, revise the 3rd sentence in the last paragraph as follows:

The Project would construct ten buildings that range from six^{39b} to ~~44~~30 stories in height and excavate for subterranean parking.

^{39b}There is a detached trio of two-story industrial sheds adjacent to Alameda Street that are accounted for as part of Building 7, which would have a maximum height of 10 stories.

2. Page IV.B-38, Subsection 3.d), Threshold (a)(1)(b)(ii), *Historic Districts*, revise the 3rd sentence in the 1st full paragraph as follows:

On the South and West Sites, the Project would construct eight buildings that range from six^{39c} to 28 stories in height and would excavate for subterranean parking on the South Site.

^{39c}There is a detached trio of two-story industrial sheds adjacent to Alameda Street that are accounted for as part of Building 7, which would have a maximum height of 10 stories.

3. Page IV.B-38, Subsection 3.d), Threshold (a)(1)(c), *Indirect Impacts – On-Site*, revise the 1st three sentences in the 1st paragraph as follows:

The Project proposes to redevelop the Project Site with a mix of residential, office, and restaurant/retail, ~~and hotel~~ uses within 10 distinct buildings over the North, South, and West Sites that comprise the Project Site. On the North Site, the Project would result in the whole or partial demolition of the LACS Building, which would represent a significant adverse impact to a historical resource ~~that cannot be mitigated to a less than significant level~~. The Project would construct a new ~~44~~30-story residential tower and six-level parking structure on the North Site.

4. Page IV.B-39, Subsection 3.d), Threshold (a)(1)(c), *Indirect Impacts – On-Site*, revise the 2nd to last sentence in the 2nd full paragraph as follows:

However, in order to present a conservative analysis of potential impacts to historical resources on the Project Site, the introduction of a contemporary ~~44~~30-story building in immediate proximity to the six-story Industrial Vernacular West Volume of the LACS Building, when taken into consideration along with the loss of

the East Volume, would result in a significant adverse change to the setting of the West Volume.

5. Page IV.B-39, Subsection 3.d), Threshold (a)(1)(d)(i), *Produce Exchange Building*, revise the 3rd sentence in the 1st paragraph as follows:

The Project would construct a 44–30-story residential tower and associated parking structure on the North Site, which is in proximity of the Produce Exchange Building.

6. Page IV.B-40, Subsection 3.d), Threshold (a)(1)(d)(ii), *Fisherman's Outlet*, revise the 3rd sentence in the 1st paragraph as follows:

The Project would construct multiple buildings ranging in height from six^{39d}– to 28–stories, along with subterranean parking, on the South Site, which is in proximity of the Fisherman's Outlet.

^{39d} There is a detached trio of two-story industrial sheds adjacent to Alameda Street that are accounted for as part of Building 7, which would have a maximum height of 10 stories.

7. Page IV.B-41, Subsection 3.d), Threshold (a)(1)(d)(ii), *Valero Gas Station*, revise the 1st full sentence in the 1st partial paragraph as follows:

The Project would construct multiple buildings ranging in height from six^{39e}– to 28–stories, along with subterranean parking, on the South Site, which is in proximity of the Valero Gas Station.

^{39e} There is a detached trio of two-story industrial sheds adjacent to Alameda Street that are accounted for as part of Building 7, which would have a maximum height of 10 stories.

8. Page IV.B-41, Subsection 3.d), Threshold (a)(1)(d)(iv), *Southern California Gas Co. Stationary & Printing Department*, revise the 3rd sentence in the 1st paragraph as follows:

The Project would construct multiple buildings ranging in height from six^{39f}– to 28–stories, along with subterranean parking, on the South Site, which is in proximity of the Southern California Gas Co. Stationary & Printing Department.

^{39f} There is a detached trio of two-story industrial sheds adjacent to Alameda Street that are accounted for as part of Building 7, which would have a maximum height of 10 stories.

5. Chapter IV.C Energy

1. Page IV.C-1, Subsection 1, *Introduction*, add a sentence after the 2nd sentence in the 2nd paragraph as follows:

In accordance with the applicable Appendix G sections and utilizing guidance from Appendix F of the State CEQA Guidelines, this Draft EIR includes relevant information and analyses that address the energy implications of the Project, focusing on the following

three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). Detailed energy calculations can be found in Appendix D of this Draft EIR. See Appendix D of this Final EIR for energy calculations associated with operation of the Project with design modifications.

2. Page IV.C-5, Subsection 2.a)(2)(c)(i), California Building Energy Efficiency Standards (Title 24, Part 6), revise the entire section as follows:

The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2019 2022 Title 24 standards, which became effective on January 1, 2020 2023.¹¹ The 2019 2022 Title 24 standards continue to improve upon the 2016 2019 Title 24 standards and encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, and strengthen ventilation standards. ~~for new construction of, and additions and alterations to, residential and nonresidential buildings which include efficiency improvements to the residential standards for attics, walls, water heating, and lighting, and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air Conditioning Engineers (ASHRAE) 90.1-2017 national standards.~~¹²

On August 11, 2021, the CEC adopted the 2022 Title 24 standards, which were approved by the California Building Standards Commission for inclusion into the California Building Standards Code in December 2021. ~~The 2022 standards encourage efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 standards.~~¹³

¹¹ California Energy Commission, 2019 2022 Building Energy Efficiency Standards, 2019 2022.

¹² ~~California Energy Commission, 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, 2018.~~

¹³ ~~California Energy Commission, 2022 Building Energy Efficiency Standards.~~

3. Page IV.C-6, Subsection 2.a)(2)(c)(ii), California Green Building Standards (Title 24, Part 11), revise the entire section as follows:

~~The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) are commonly referred to as the CALGreen Code. The 2019 CALGreen Code includes mandatory measures for non-residential development related to site development; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. The 2019 CALGreen Code improves upon the 2016 CALGreen Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation. The 2019 CALGreen Code went into~~

~~effect on January 1, 2020. Refer to Section IV.E, *Greenhouse Gas Emissions*, of this Draft EIR for additional details regarding these standards.~~

⁴⁴ ~~California Building Standards Commission, Guide to the 2016 California Green Building Standards Code Nonresidential, 2018.~~

On August 11, 2021, the CEC adopted the 2022 Title 24 Standards, which were approved by the California Building Standards Commission for inclusion into the California Building Standards Code in December 2021. The 2022 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, and strengthen ventilation standards. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 standards.¹⁴

¹⁴ California Energy Commission, 2022 Building Energy Efficiency Standards.

4. Page IV.C-24, Section 2.b)(2), *Natural Gas*, revise the 2nd sentence of the 3rd full paragraph and footnote as follows:

Based on outputs from the California Emissions Estimator Model (CalEEMod) (version ~~2020.4.0~~ 2022.1),⁴⁰ the Project Site's existing annual natural gas demand is approximately 7,336,832 cf.

⁴⁰ California Air Pollution Control Officers Association, California Emissions Estimator Model (CalEEMod), ~~2017~~ 2022, <http://caleemod.com/>, accessed ~~December 5, 2020~~ May 10, 2024.

5. Page IV.C-28, Subsection 3.b)(1)(a), *Electricity*, revise the 2nd sentence and footnote as follows:

The amount of construction office space for the Project was assumed to be up to 2,000 square feet and was modeled using CalEEMod (version ~~2020.4.0~~ 2022.1).⁴⁷

⁴⁷ California Air Pollution Control Officers Association, California Emissions Estimator Model (CalEEMod), ~~2021~~ 2022, <http://caleemod.com/>, accessed ~~April 2022~~ May 10, 2024.

6. Page IV.C-30, Subsection 3.b)(2), *Operation*, revise footnote 50 and 51 as follows:

⁵⁰ ~~California Air Resources Board, CalEEMod User's Guide, Appendix E, Section 5, September 2016.~~ Factors for the prior Title 24 standard are extrapolated based on the technical source documentation. California Air Pollution Control Association, California Emissions Estimator Model (CalEEMod), User's Guide, April 2022.

⁵¹ Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1. ~~While the Project's requested Development Agreement will likely be effective through 2040, comparison~~ A comparison to the analyzed buildout year of 2025 provides a conservative analysis as supply projections for electricity increase in future years.

7. Page IV.C-31, Subsection 3.b)(2)(c), *Transportation Fuels*, revise the footnote for the 1st sentence and add a sentence at the of the paragraph as follows:

⁵² Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of the Project's Draft EIR; see Appendix F of the Final EIR for the VMT analysis associated with the Project design modifications.

Refer to VMT data in Appendix B and Appendix J of this Draft EIR and energy calculations in Appendix D of this Draft EIR. See Appendix D of the Final EIR for energy calculations associated with operation of the Project with design modifications.

8. Page IV.C-36, Subsection 3.d), Threshold (a)(1)(a)(ii), *Operation*, revise Table IV.C-4 as follows:

TABLE IV.C-4
SUMMARY OF ANNUAL NET NEW ENERGY USE DURING PROJECT OPERATION – PROJECT ^{A,C}

Energy Type	Annual Quantity ^b
Electricity	
Existing Site	(6,542,773 kWh)
Project	
Building Energy	~~26,378,029~~ <u>25,007,423</u> kWh
Water Conveyance	~~859,813~~ <u>842,011</u> kWh
Cooling Tower	146,176 kWh
EV Charging	~~398,288~~ <u>393,470</u> kWh
Project Subtotal	~~27,782,306~~ <u>26,242,904</u> kWh
Total Net Electricity	~~21,239,533~~ <u>19,700,131</u> kWh
Natural Gas	
Existing Site	(7,336,832 cf)
Project	
Building Energy	0 cf
Mobile Sources	~~2,830,007~~ <u>3,125,805</u> cf
Project Subtotal	~~2,830,007~~ <u>3,125,805</u> cf
Total Net Natural Gas	~~(4,506,825)~~ <u>4,211,027</u> cf
Transportation Fuel	
Existing Site	
Gasoline	(80,824 gallons)
Diesel – Vehicles	(405,691 gallons)
Diesel – Emergency Generators	(2,467 gallons)
Project	
Gasoline	~~1,079,134~~ <u>1,191,927</u> gallons
Diesel – Vehicles	~~217,745~~ <u>237,531</u> gallons
Diesel – Emergency Generators	28,440 gallons

TABLE IV.C-4
SUMMARY OF ANNUAL NET NEW ENERGY USE DURING PROJECT OPERATION – PROJECT ^{A,C}

Energy Type	Annual Quantity ^b
Total Net Transportation Fuel – Gasoline	~~998,340~~ <u>1,111,103</u> gallons
Total Net Transportation Fuel – Diesel	~~(190,444)~~ <u>170,628</u> gallons

kWh = kilowatt-hours

cf = cubic feet

^a Detailed calculations are provided in Appendix D of this Draft EIR. See Appendix D of the Final EIR for energy calculations associated with operation of the Project with design modifications.

^b Totals may not add up exactly due to rounding of decimals.

^c Negative values are denoted using parentheses.

^d Transportation fuel totals incorporate VMT reductions associated with implementation of Project land use characteristics that are consistent with SCAG 2020-2045 RTP/SCS actions and strategies.

SOURCE: ESA, 2023. Updated in May 2024.

9. Page IV.C-37, Subsection 3.d), Threshold (a)(1)(a)(ii)(a), *Electricity*, revise the 1st paragraph as follows:

Based on the 2019 Title 24 standards and applicable 2019 CALGreen requirements and associated building energy factors in CalEEMod, at buildout, the Project would result in a projected net increase in the on-site annual demand for electricity totaling ~~21,239,533~~ 19,700,131 kWh for the Project, as shown in Table IV.C-4.

10. Page IV.C-38, Subsection 3.d), Threshold (a)(1)(a)(ii)(a), *Electricity*, revise the 2nd sentence of the 2nd full paragraph as follows:

As such, the Project-related net increase in annual electricity consumption of ~~21,239,533~~ 19,700,131 kWh for the Project would represent ~~0.08~~ 0.07 percent of LADWP's projected sales in 2030 and would be within LADWP's projected electricity supplies.

11. Page IV.C-38, Subsection 3.d), Threshold (a)(1)(a)(ii)(b), *Natural Gas*, revise the last sentence of the page that continues onto page IV.C-39 as follows:

However, it is estimated from EMFAC2021 that approximately ~~2,830,007~~ 3,125,805 cf of natural gas would be used for Project operation activities related to transportation sources (i.e., natural gas-fueled vehicles), as indicated in Table IV.C-4 which is discussed in further detail under *Transportation Energy*.

12. Page IV.C-39, Subsection 3.d), Threshold (a)(1)(a)(ii)(c), *Stationary Sources*, revise the 1st sentence as follows:

The Project would also include emergency generators with one emergency generator in Building 2 on the North Site with an estimated capacity rated at approximately ~~2,500~~ 2,000 kilowatts (~~3,353~~ 2,682 horsepower), two emergency generators shared between Buildings 3,4 and 5 on the South Site with an estimated capacity rated at approximately

1,500 kilowatts (2,012 horsepower) each, two emergency generators shared between Buildings 6, 7, 8 and 9 on the South Site with an estimated capacity rated at approximately 2,000 kilowatts (2,682 horsepower) each and 2,500 kilowatts (3,353 horsepower), one emergency generator in Building 10 on the West Site with an estimated capacity rated at approximately 1,500 kilowatts (2,012 horsepower), which would provide emergency power primarily for lighting and other emergency building systems.

13. Page IV.C-39, Subsection 3.d), Threshold (a)(1)(a)(ii)(c), *Stationary Sources*, revise the footnote as follows:

⁶² Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of this Draft EIR. See Appendix F of the Final EIR for the VMT analysis associated with the Project with design modifications.

14. Pages IV.C-39 and IV.C-40, Subsection 3.d), Threshold (a)(1)(a)(ii)(d), *Transportation Energy*, revise the 2nd paragraph as follows:

As shown in Table IV.C-4, the Project's estimated annual net increase in petroleum-based fuel usage would be ~~998,340~~ 1,111,103 gallons of gasoline and would decrease natural gas usage by ~~4,506,825~~ 4,211,027 cf and diesel fuel use by ~~490,414~~ 170,628 gallons due to the Project's land use change from a warehouse and cold storage facility that requires a high volume of diesel-powered heavy-duty trucks to a mixed-use land use that results in far less heavy duty trucks and more passenger vehicle trips. SoCalGas accounts for anticipated regional demand based on various factors, including growth in employment by economic sector, growth in housing and population, and increasingly demanding state goals for reducing GHG emissions. SoCalGas accounts for an increase in employment and housing between 2018 to 2035. Furthermore, the 2020 California Gas Report estimates that natural gas supplies within SoCalGas' planning area will be 820,520 million cf in 2030 (the Project's buildout year) (California Gas and Electric Utilities 2020). As stated above, the Project's annual net decrease in demand for natural gas is estimated to be ~~4,506,825~~ 4,211,027. Therefore, the Project would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth. Based on the California Energy Commission's *California Annual Retail Fuel Outlet Report*, Los Angeles County consumed approximately 3,559,000,000 gallons of gasoline and approximately 563,300,000 gallons of diesel fuel in 2019.⁶³ The Project would account for approximately ~~0.028~~ 0.031 percent of County's 2019 gasoline consumption and would not increase County diesel consumption.

15. Page IV.C-41, Subsection 3.d), Threshold (a)(1)(a)(ii)(e), *Summary of Energy Requirements and Energy Use Efficiencies*, revise the 8th, 9th, and last sentences of the paragraph and add a new sentence at the end of the paragraph as follows:

During Project operations, ~~21,239,533~~ 19,700,131 kWh of electricity would be consumed on an annual basis. The Project would also result in ~~998,340~~ 1,111,103 gallons of gasoline and a net decrease of ~~490,414~~ 170,628 gallons of diesel on an annual basis.

Transportation fuel usage would be reduced by ~~34~~ 35 percent compared to the Project without trip reduction features. Detailed calculations demonstrating this reduction are provided in Appendix D of this Draft EIR. See Appendix D of this Final EIR for energy calculations associated with operation of the Project with design modifications.

16. Page IV.C-43, Subsection 3.d), Threshold (a)(1)(b)(ii)(a), *Electricity*, revise the 1st and 2nd full sentences as follows:

The Project-related net increase in annual electricity consumption of ~~21,239,533~~ 19,700,131 kWh per year would represent ~~0.08~~ 0.07 percent of LADWP's projected sales for the 2030-2031 fiscal year and would be consistent with LADWP's anticipated regional demand from population or economic growth. During peak conditions, the Project would represent ~~0.08~~ 0.07 percent of the LADWP estimated peak load.

17. Page IV.C-43, Subsection 3.d), Threshold (a)(1)(b)(ii)(b), *Natural Gas*, revise the 3rd and 4th sentences as follows:

The estimated ~~2,830,007~~ 3,125,805 cf of natural gas shown in ~~Table 3-6-2~~ IV.C-4 would be utilized for transportation sources (i.e., natural gas-fueled vehicles). As stated above, the Project's estimated annual net decrease in demand for natural gas would be ~~4,506,825~~ 4,211,027 cf.

18. Page IV.C-44, Subsection 3.d), Threshold (a)(1)(b)(ii)(c), *Transportation Energy*, revise the 1st and 2nd sentences and add a sentence after the 3rd sentence in the paragraph as follows:

As stated above, at buildout, the Project would consume a net increase of ~~998,310~~ 1,111,103 gallons of gasoline and would decrease diesel fuel use from existing conditions by ~~490,414~~ 170,628 gallons per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately ~~0.028~~ 0.031 percent of the 2019 annual on-road gasoline consumption in Los Angeles County (based on the available County fuel sales data). Detailed calculations are shown in in Appendix D of this Draft EIR. See Appendix D of the Final EIR for energy calculations associated with operation of the Project with design modifications.

19. Pages IV.C-44 and IV.C-45, Subsection 3.d), Threshold (a)(1)(c), *The Effects of the Project on Peak and Base Period Demands for Electricity and Other Forms of Energy*, revise the 6th and 7th sentences as follows:

Under peak conditions, the Project would consume a net increase of ~~21,239,533~~ 19,700,131 kWh on an annual basis which, assuming 12 hours of active electricity demand per day, would be equivalent to ~~4,849~~ 4,498 kW (peak demand assuming 4,380 hours per year of active electricity demand).⁷⁵ In comparison to the LADWP power grid base peak load of 6,348 MW for 2030-2031, based on the assumption above, the Project would represent ~~0.08~~ 0.07 percent of the LADWP base peak load conditions and,

therefore, would not create any new peak demand impacts that are inconsistent with LADWP demand projections.⁷⁶

20. Page IV.C-45, Subsection 3.d), Threshold (a)(1)(d), *The degree to which the project complies with existing energy standards*, revise the 3rd sentence of the 1st paragraph as follows:

Electricity and natural gas usage during Project operations ~~presented in Table IV.C-4 on page IV.C-33~~ would comply with ~~2019~~ applicable Title 24 standards, ~~and applicable CALGreen Code requirements, and the Los Angeles Green Building Code requirements.~~

21. Page IC.C-46, Subsection 3.d), Threshold (a)(1)(e), *The Effects of the Project on Energy Resources*, revise the 1st sentence of the last paragraph as follows:

As stated earlier in the discussion under Threshold (a)(1)(~~a~~)(i)(c) and Threshold (a)(1)(~~b~~)(ii)(c), transportation fuels (gasoline and diesel) are produced from crude oil, which can be provided domestically or imported from various regions around the world.

22. Page IV.C-49, Subsection 3.d), Threshold (b)(1), *Impact Analysis*, revise the 5th sentence of the 1st paragraph as follows:

The ~~2019~~ applicable Title 24 standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices.

23. Page IV.C-50, Subsection 3.d), Threshold (b)(1), *Impact Analysis*, revise the 1st sentence of the 2nd paragraph as follows:

Electricity and natural gas usage during Project operations, ~~as presented in Table IV.C-4,~~ would be minimized through incorporation of applicable ~~2019~~ Title 24 standards, applicable ~~2019~~ CALGreen Code requirements, and the Los Angeles Green Building Code requirements.

24. Page IV.C-55, Subsection 3.e)(1)(a)(iii), *Transportation Energy*, revise the 1st and 2nd sentences of the 1st paragraph and add a sentence at the end of the paragraph as follows:

As described above, at buildout, the Project would consume a total net increase of ~~998,340~~ 1,111,103 gallons of gasoline and would reduce diesel consumption by ~~190,414~~ 170,628 gallons per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately ~~0.028~~ 0.031 percent of the 2019 annual on-road gasoline-related energy consumption and in Los Angeles County (based on the available County fuel sales data), as shown in Appendix D of this Draft EIR. See Appendix D of the Final EIR for energy calculations associated with operation of the Project with design modifications.

25. Page IV.C-55, Subsection 3.e)(1)(a)(iii), *Transportation Energy*, revise the 4th sentence of the 3rd paragraph as follows:

The Project would locate residential, ~~hotel~~, office, retail and restaurant uses at an urban infill location with an existing street grid and in proximity to existing public transit options and in proximity to off-site uses (i.e., commercial, shopping and entertainment businesses and neighborhood housing uses) and would allow people in the neighborhood and community to utilize the nearby Project Site land uses.

6. Chapter IV.E Greenhouse Gas Emissions

1. Page IV.E-1, Subsection 1, *Introduction*, add a sentence at the end of the paragraph as follows:

Details of the GHG analysis are provided in the *Air Quality and Greenhouse Gas Technical Documentation* appendix, which is attached as Appendix B of this Draft EIR, and are incorporated by reference. See Appendix C of this Final EIR for GHG emissions calculations associated with the Project with design modifications.

2. Page IV.E-56, Subsection 3.b)(2)(ii), *Project Construction Emissions*, add a sentence to end of the 1st paragraph as follows:

A more detailed discussion of the methodology for projecting the Project's construction emissions and descriptions of the Project's construction subphasing and equipment list are available in the *Air Quality and Greenhouse Gas Technical Documentation* appendix for the Project, which is provided in Appendix B of this Draft EIR. See pages 805 through 982 of Appendix C of this Final EIR for GHG emissions details associated with the Project with design modifications.

3. Page IV.E-57, Subsection 3.b)(2)(iii) *Project Operational Emissions*, revise footnote as follows:

¹⁰⁸ Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of this Draft EIR; see Appendix F of this Final EIR for the VMT analysis associated with the Project design modifications.

4. Page IV.E-57, Subsection 3.b)(2)(iii), *Project Operational Emissions*, revise the 9th full sentence of the paragraph and add a sentence after the 10th sentence as follows:

As shown in Appendix B, *Air Quality and Greenhouse Gas Emissions Appendix*, and the Project's TA, included as Appendix J of this Draft EIR, incorporation of USEPA MXD VMT reduction features applicable to the Project results in a ~~34.0~~ 35.4 percent reduction in overall VMT for the Project and resultant pollutant emissions. Refer to VMT data in Appendix B and Appendix J of this Draft EIR. See Appendix C of this Final EIR for data associated with the Project with design modifications.

5. Page IV.E-58, Subsection 3.b)(2)(iii), *Project Operational Emissions*, revise the 3rd sentence of the 2nd full paragraph as follows:

Future fuel consumption rates are estimated based on specific square footage of the Project's residential, ~~hotel~~, office, retail and restaurant, and vehicular parking land uses, as well as predicted water supply needs of the Project.

6. Page IV.E-59, Subsection 3.b)(2)(iii), *Project Operational Emissions*, revise the 2nd sentence of the 2nd full paragraph as follows:

The emissions are based on the size of the Project's residential, ~~hotel~~, office, retail and restaurant uses, the waste disposal rate for the land uses was estimated based on the assumed average number of residents, visitors, and employees on the Project Site per day, and the GWP values for the GHGs emitted.

7. Page IV.E-60, Subsection 3.b)(2)(iii), *Project Operational Emissions*, add a sentence to end of the 1st full paragraph as follows:

Refer to Section IV.L.1, *Utilities and Service Systems – Water Supply*, and Section IV.L.2, *Utilities and Service Systems – Wastewater*, of this Draft EIR for the estimated water usage rate for the Project. Refer to Section III, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR, for utility information related to the Project with design modifications.

8. Page IV.E-60, Subsection 3.b)(2)(iii), *Project Operational Emissions*, revise the 2nd sentence of the 2nd full paragraph as follows:

The emissions for landscaping equipment are based on the size of the open space based on the Project's residential, ~~hotel~~, office, retail, and restaurant land uses, the GHG emission factors for fuel combustion, and the GWP values for the GHGs emitted.

9. Page IV.E-60, Subsection 3.b)(2)(iii), *Project Operational Emissions*, revise the 1st sentence of the 3rd full paragraph as follows:

Stationary sources would also include emergency generators with one emergency generator in Building 2 on the North Site with an estimated capacity rated at approximately ~~2,500 kilowatts (3,353 horsepower)~~ 2,000 kilowatts (2,682 horsepower), two emergency generators shared between Buildings 3, 4 and 5 on the South Site with an estimated capacity rated at approximately 1,500 kilowatts (2,012 horsepower) each, two emergency generators shared between Buildings 6, 7, 8 and 9 on the South Site, one with an estimated capacity rated at approximately 2,000 kilowatts (2,682 horsepower) and one with an estimated capacity rated at approximately 2,500 kilowatts (3,353 horsepower) ~~each~~, one emergency generator in Building 10 on the West Site with an estimated capacity rated at approximately 1,500 kilowatts (2,012 horsepower), which would provide emergency power primarily for lighting and other emergency building systems.

10. Page IV.E-61, Subsection 3.b)(2)(iii), *Project Operational Emissions*, revise the last sentence of the 1st full paragraph as follows:

In addition, the Project Without GHG Reduction Characteristics, Features, and Measures scenario does not account for land use characteristics of the Project that reduce VMT given its mix of complementary residential, ~~hotel~~, office, retail and restaurant uses, and location at an urban infill location with nearby access to public transportation and would not incorporate certain VMT reductions from the Project's TA and the TDM trip reductions.

11. Page IV.E-65, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the 3rd sentence of the 1st full paragraph as follows:

The Project would provide a total of ~~2,475~~ 2,444 parking spaces and the Project design would provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces (approximately ~~743~~ 733 spaces), with 10 percent of the LAMC-required spaces further improved with electric vehicle charging stations (approximately ~~248~~ 245 spaces).

12. Page IV.E-65, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the last sentence of the 3rd full paragraph as follows:

The Project would provide a total of ~~2,475~~ 2,444 parking spaces and the Project design would provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces (approximately ~~743~~ 733 spaces), with 10 percent of the LAMC-required spaces further improved with electric vehicle charging stations (approximately ~~248~~ 245 spaces), which would exceed the CALGreen 2022 requirement.

13. Page IV.E-66, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the 1st four sentences of the 4th full paragraph as follows:

The Project proposes to provide ~~2,475~~ 2,444 parking stalls ~~and to meet the Los Angeles Municipal Code (LAMC) vehicle parking requirements~~, within subterranean parking (up to four levels) and six levels of podium parking in Building 2 and four levels of podium parking in Building 9. For informational purposes, the ~~The~~ Project's vehicular parking requirement under the LAMC is ~~2,658-2,789~~ spaces. However, pursuant to LAMC Section 12.21 A.4, the Project would replace some required vehicular parking spaces with bicycle parking spaces, which reduces the total vehicular parking requirement to ~~2,474~~ 2,588 spaces. The Project would include ~~742~~ 792 bicycle parking spaces (~~446~~ 163 short-term and ~~596~~ 629 long-term spaces), as required by LAMC Section 12.21 A.16(a)(2). Since the Project is located within a half-mile radius of a major transit stop and has removed the proposed hotel component, the Project with design modifications is eligible for the parking exemption under AB 2097, and is therefore not required to provide any vehicular parking spaces. Nonetheless, the Project is still proposing to provide 2,444 parking spaces.

14. Page IV.E-67, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the 2nd paragraph as follows:

This reduction strategy mainly applies to City traffic circulation. However, the Project would implement Complete ~~street~~ Street policies by complying with the General Plan Circulation Element (Mobility Plan 2035) requirements by including features to encourage public transit use, walking and bicycling. The Project would occupy a location within an identified HQTa and TPA that is highly accessible by existing transit options as further discussed below, including regional and local bus service and regional rail service with connections to public transportation hubs. In addition, the Project would include approximately ~~742~~ 792 bicycle parking spaces, as required by LAMC Section 12.21 A.16(a)(2). Approximately ~~446~~ 163 of the total spaces will be short-term spaces, with the remaining ~~596~~ 629 spaces designated as long-term bicycle parking spaces. The Project's bicycle parking spaces and facilities will be provided at various locations throughout the Project Site, which include lockers, fix-it/repair stations and showers. Therefore, the Project complies with complete street policies and would not conflict with implementation of Complete Streets policies.

15. Page IV.E-68, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the last two sentences of the 2nd full paragraph as follows:

In addition, the Project would include approximately ~~742~~ 792 bicycle parking spaces, as required by LAMC Section 12.21 A.16(a)(2). Approximately ~~446~~ 163 of the total spaces will be short-term spaces, with the remaining ~~596~~ 629 spaces designated as long-term bicycle parking spaces.

16. Page IV.E-68 and IV.E-69, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the last sentence of the last partial paragraph and the 1st full sentence on the following page as follows:

Because of the Industrial Designation and the FAR limitation, the Project is seeking a General Plan Amendment pursuant to LAMC Section 11.5.6 A to re-designate the underlying land use from Light Industrial to Regional Commercial, and a Vesting Zone Change and Height District Change pursuant to LAMC Sections 12.32 F, 12.32 H, and 12.32 Q, to change the zone from M2-2D/M2-2D-O to ~~G2-2~~ C2-3D, ~~which involves removing the D Development Limitation.~~ The Project is located within the Framework Element's Downtown Center and would be consistent with the General Plan designation that supports ~~hotels~~, professional offices, corporate headquarters, and high-rise residential towers within the Downtown Center.

17. Page IV.E-69, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the 1st full paragraph as follows:

The Project would not convert any natural and working lands to urban uses. The Project is an infill project that provides increased opportunities to use alternative transportation

modes by co-locating complementary residential, ~~hotel~~, office, retail, and restaurant land uses on an infill Project Site that is in close proximity to existing off-site commercial and residential uses, being located within a quarter-mile of off-site commercial and residential uses, and located within an identified HQTa in a highly walkable area well served by public transportation for visitors, residents, employees and patrons and would include ~~742~~ 792 bicycle parking spaces, as required by LAMC Section 12.21 A.16(a)(2). Approximately ~~446~~ 163 of the total spaces will be short-term spaces, with the remaining ~~596~~ 629 spaces designated as long-term bicycle parking spaces. The Project's bicycle parking spaces and facilities will be provided at various locations throughout the Project Site, which include lockers, fix-it/repair stations and showers.

18. Page IV.E-70, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the last two sentences of the 1st full paragraph as follows:

Also, as the Project is an infill project that provides increased opportunities to use alternative transportation modes by co-locating complementary residential, ~~hotel~~, office, retail, and restaurant land uses on an infill Project Site that is in close proximity to existing off-site commercial and residential uses, being located within a quarter-mile of off-site commercial and residential uses, and located within an identified HQTa in a highly walkable area well served by public transportation for visitors, residents, employees and patrons that may help to further reduce GHG emissions. In addition, the Project would provide a total of ~~2,475~~ 2,444 parking spaces and the Project design would provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces (approximately ~~743~~ 733 spaces), with 10 percent of the LAMC-required spaces further improved with electric vehicle charging stations (approximately ~~248~~ 245 spaces), which would exceed the CALGreen 2022 requirement that may also help to further reduce GHG emissions by encouraging increased EV use.

19. Page IV.E-72, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the 3rd sentence of the 1st full paragraph as follows:

In addition, ~~the Project would support A~~ as discussed in the Project's Water Supply Section IV.L.1, *Utilities and Service Systems – Water Supply*, the Project would further reduce water consumption through the additional water conservation features (Project Design Feature PDF-WS-1) of the Project¹²⁹ and potential strategies that include the installation of water efficient fixtures that exceed applicable standards and water efficient landscaping (refer to Section IV.L.1, *Utilities and Service Systems – Water Supply*, of this Draft EIR).

20. Page IV.E-73, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the 1st sentence of the 1st full paragraph as follows:

In addition to energy efficiency measures, the Project would result in carbon sequestration benefits by planting ~~422~~ 439 net new California native trees.

21. Page IV.E-74, Subsection 3.d), Thresholds (a) and (b)(1)(a), *CARB's Climate Change Scoping Plan*, revise the 4th sentence of the 1st paragraph as follows:

The Project would not conflict with these strategies given it would locate residential, ~~hotel~~, office, retail and restaurant uses on an infill Project Site located within a walkable area of the Central City East District of the City's Central City Community Plan area with access to public transit and employment opportunities, restaurants and entertainment.

22. Page IV.E-77, Subsection 3.d), Thresholds (a) and (b)(1)(b), *SCAG's 2020-20245 RTP/SCS, Table IV.E-8, Comparison of Project Characteristics with Applicable SCAG 2016-2040 RTP/SCS and 2020-2045 RTP/SCS Actions and Strategies*, revise the conflict analysis for the second Land Use Actions and Strategies on the page as follows:

Would Not Conflict. While this action applies to local jurisdictions and SCAG, the Project would provide approximately 90,113 sf of publicly accessible open space, consisting of plazas and paseos passing between Central Avenue and Alameda Street and a Central Courtyard in the South Site that would provide linkages to the surrounding pedestrian walkways. There are a total of 12 individually curated publicly accessible open space areas (see Chapter II, *Project Description*, of this Draft EIR for additional details). The Project would locate residential, ~~hotel~~, office, retail and restaurant uses on an infill Project Site located within a walkable area of the Central City East District neighborhood in Los Angeles with access to public transit. The Project would also provide ~~742~~ 792 bicycle parking spaces, where approximately ~~446~~ 163 of the total spaces will be short-term spaces and ~~596~~ 629 spaces designated as long-term bicycle parking spaces on-site to encourage utilization of alternative modes of transportation.

23. Page IV.E-78, Subsection 3.d), Thresholds (a) and (b)(1)(b), *SCAG's 2020-20245 RTP/SCS, Table IV.E-8, Comparison of Project Characteristics with Applicable SCAG 2016-2040 RTP/SCS and 2020-2045 RTP/SCS Actions and Strategies*, revise the conflict analysis for the 1st two sentences of the Land Use Actions and Strategies on the page as follows:

Would Not Conflict. While this action applies to local jurisdictions, the Project would support this action/strategy by creating a mixed-use development comprising of residential, ~~hotel~~, office, retail, and restaurant land uses that offer employment and other community-serving opportunities. The Project supports the development of a balanced mixed of uses by co-locating complementary residential, ~~hotel~~, office, retail, and restaurant land uses on an infill Project Site that is in close proximity to existing off-site commercial and residential uses, being located within a quarter-mile of off-site commercial and residential uses, and located within an identified HQTAs in a highly walkable area well served by public transportation.

24. Page IV.E-79, Subsection 3.d), Thresholds (a) and (b)(1)(b), *SCAG's 2020-20245 RTP/SCS, Table IV.E-8, Comparison of Project Characteristics with Applicable SCAG 2016-2040 RTP/SCS and 2020-2045 RTP/SCS Actions and Strategies*, revise the conflict analysis for the 1st sentence of the 1st Land Use Actions and Strategies on the page as follows:

Would Not Conflict. While this action applies to local jurisdictions and SCAG, the Project supports the development of complete communities by co-locating complementary residential, office, and restaurant/retail, ~~and hotel~~ land uses within a quarter-mile of existing off-site commercial and residential uses, and within an identified HQTa in a walkable area served by transit.

25. Page IV.E-80, Subsection 3.d), Thresholds (a) and (b)(1)(b), *SCAG's 2020-20245 RTP/SCS, Table IV.E-8, Comparison of Project Characteristics with Applicable SCAG 2016-2040 RTP/SCS and 2020-2045 RTP/SCS Actions and Strategies*, revise the conflict analysis for the 2nd and 3rd sentences of the 1st Land Use Actions and Strategies on the page as follows:

The Project is a mixed-use development comprising of residential, ~~hotel~~, office, retail, and restaurant land uses located on an urban infill Project Site within an identified HQTa. It co-locates its complementary residential, office, and restaurant/retail, ~~and hotel~~ land uses, which are in close proximity to existing off-site commercial and residential uses.

26. Page IV.E-80, Subsection 3.d), Thresholds (a) and (b)(1)(b), *SCAG's 2020-20245 RTP/SCS, Table IV.E-8, Comparison of Project Characteristics with Applicable SCAG 2016-2040 RTP/SCS and 2020-2045 RTP/SCS Actions and Strategies*, revise the conflict analysis for the last sentence of the 1st Transportation Network Actions and Strategies on the page as follows:

Furthermore, the Project would provide high-density residential, ~~hotel~~, office, retail, and restaurant land uses in an area with access to a range of existing entertainment and commercial uses.

27. Page IV.E-81, Subsection 3.d), Thresholds (a) and (b)(1)(b), *SCAG's 2020-20245 RTP/SCS, Table IV.E-8, Comparison of Project Characteristics with Applicable SCAG 2016-2040 RTP/SCS and 2020-2045 RTP/SCS Actions and Strategies*, revise the conflict analysis for the 2nd sentence of the 1st Clean Vehicle Technology Actions and Strategies on the page as follows:

Specifically, the Project would support a land use pattern that provides increased opportunities to use alternative transportation modes by co-locating complementary residential, office, and restaurant/retail, ~~and hotel~~ land uses within a quarter-mile of existing off-site commercial and residential uses, and within an identified HQTa in a walkable area served by transit.

28. Page IV.E-82, Subsection 3.d), Thresholds (a) and (b)(1)(b)(i), *Integrated Growth Forecast*, revise the 4th to 6th sentences of the paragraph as follows:

Based on the 2020–2045 RTP/SCS growth projections, the Project's proposed ~~3,423~~ 3,576 population increase would comprise approximately 1.5 percent of SCAG's year 2030 estimated increase of 231,034 households within the City and approximately 0.5 percent of SCAG's 2045 estimated increase of 664,224 population growth within the City, relative to 2022.¹³⁵ Based on the 2020–2045 RTP/SCS growth projections, the Project's proposed ~~4,524~~ 1,589 housing units would comprise approximately ~~4.3~~ 1.4 percent of SCAG's year 2030 estimated increase of 117,517 households within the City and approximately 0.5 percent of SCAG's 2045 estimated increase of 337,862 households within the City, relative to 2022.¹³⁶ Based on the 2020–2045 RTP/SCS growth projections, the Project would result in an increase in the number of employees on the Project Site of approximately ~~2,039~~ 2,073 net new employees, which would comprise approximately 2.6 percent of SCAG's year 2030 estimated increase of 79,337 employees within the City and approximately 0.9 percent of SCAG's 2045 estimated increase of 228,096 employees within the City.¹³⁷

29. Page IV.E-83, Subsection 3.d), Thresholds (a) and (b)(1)(b)(ii), *VMT Reduction Strategies and Policies*, revise the 5th and 6th full sentences of the 1st partial paragraph as follows:

In addition, the Project would include approximately ~~742~~ 792 bicycle parking spaces, as required by LAMC Section 12.21 A.16(a)(2). Approximately ~~446~~ 163 of the total spaces will be short-term spaces, with the remaining ~~596~~ 629 spaces designated as long-term bicycle parking spaces.

30. Page IV.E-83, Subsection 3.d), Thresholds (a) and (b)(1)(b)(ii), *VMT Reduction Strategies and Policies*, revise the 4th sentence of the second full paragraph as follows:

The Project supports this by locating residential, ~~hotel~~, office, retail and restaurant uses at an urban infill location with an existing street grid and in proximity to existing public transit options and in proximity to off-site uses (i.e., commercial, shopping and entertainment businesses and neighborhood housing uses) and would allow people in the neighborhood and community to utilize the nearby Project Site land uses.

31. Page IV.E-84, Subsection 3.d), Thresholds (a) and (b)(1)(b)(ii), *VMT Reduction Strategies and Policies*, revise the 1st sentence of the 1st full paragraph as follows:

By locating the Project's residential, ~~hotel~~, office, retail and restaurant uses within an area that has existing high quality public transit (with access to existing local and regional bus service) and employment opportunities within walking distance, and by including features that support and encourage pedestrian activity and other non-vehicular transportation and increased transit use in the Central City East District of the Central City Community Plan

area, the Project would reduce vehicle trips and VMT and resulting air pollution and GHG emissions.

32. Page IV.E-86 to IV.E-89, Subsection 3.d), Thresholds (a) and (b)(1)(c), *City's Green New Deal*, revise table number of Table IV.E-9, *Comparison of Project Characteristics to Applicable City of Los Angeles Green New Deal Goals and Actions*, as follows:

TABLE IV.E-409

COMPARISON OF PROJECT CHARACTERISTICS TO APPLICABLE CITY OF LOS ANGELES GREEN NEW DEAL GHG EMISSIONS GOALS AND ACTIONS

33. Page IV.E-87, Subsection 3.d), Thresholds (a) and (b)(1)(c), *City's Green New Deal*, Table IV.E-9, *Comparison of Project Characteristics to Applicable City of Los Angeles Green New Deal GHG Emissions Goals and Actions*, revise the last two sentences of the 1st paragraph and the 1st sentence of 2nd paragraph of the conflict analysis for the 1st target of Chapter 6: Mobility & Public Transit on the page as follows:

The Project would also provide ~~742~~ 792 bicycle parking spaces, where approximately ~~446~~ 163 of the total spaces will be short-term spaces and ~~596~~ 629 spaces designated as long-term bicycle parking spaces on-site to encourage utilization of alternative modes of transportation area.

Additionally, the Project would co-locate its complementary residential, office, and restaurant/retail, ~~and hotel~~ land uses, which are in close proximity to existing off-site commercial and residential uses.

34. Page IV.E-88, Subsection 3.d), Thresholds (a) and (b)(1)(c), *City's Green New Deal*, Table IV.E-9, *Comparison of Project Characteristics to Applicable City of Los Angeles Green New Deal GHG Emissions Goals and Actions*, revise the last sentence of the conflict analysis for Chapter 7: Zero Emissions Vehicles on the page as follows:

In addition, the Project design provides for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces (approximately ~~743~~ 733 spaces), with 10 percent of the Code-required spaces further improved with electric vehicle charging stations (approximately ~~248~~ 245 spaces).

35. Page IV.E-89, Subsection 3.d), Thresholds (a) and (b)(1)(c), *City's Green New Deal, Table IV.E-9, Comparison of Project Characteristics to Applicable City of Los Angeles Green New Deal GHG Emissions Goals and Actions*, revise the conflict analysis for the 3rd target of Chapter 9: Waste & Resource Recovery on the page as follows:

The Project consists residential, office, and restaurant/retail, ~~and hotel~~ land uses, which would participate in City trash services, including the participation in the organic waste recycling program once the Citywide residential program is implemented.

36. Page IV.E-89, Subsection 3.d), Thresholds (a) and (b)(1)(c), *City's Green New Deal, Table IV.E-9, Comparison of Project Characteristics to Applicable City of Los Angeles Green New Deal GHG Emissions Goals and Actions*, revise the 1st and 3rd sentences of the conflict analysis for the 1st target of Chapter 11: Urban Ecosystems & Resilience on the page as follows:

While this action applies to the City in general, and not specifically to individual private development, the residential uses would generate a requirement of ~~382~~ 399 trees to be provided within the Project Site. In addition, the existing 20 street trees to be removed during Project construction would be required to be replaced at a 2:1 ratio for a total of 40 replacement trees. Approximately ~~144,142~~ 158,225 sf of retail and restaurants uses as well as 90,113 sf of publicly accessible open space, consisting of plazas and paseos passing between Central Avenue and Alameda Street and a Central Courtyard in the South Site that would provide linkages to the surrounding pedestrian walkways.

37. Page IV.E-91, Subsection 3.d), Thresholds (a) and (b)(2), *Impact Analysis*, revise the 2nd to last sentence of the paragraph as follows:

The Project would not generate an incremental contribution to and a cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

38. Page IV.E-92, Subsection 3.d), Thresholds (a) and (b)(2)(b), *Operational Emissions*, revise footnote as follows:

¹³⁸ Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of this Draft EIR; see Appendix F of the Final EIR for the VMT analysis associated with the Project design modifications.

39. Page IV.E-93, Subsection 3.d), Thresholds (a) and (b)(2)(b), *Operational Emissions*, revise Table IV.E-11 as follows:

See revised Table IV.E-11 on the following page.

TABLE IV.E-11
ESTIMATED OPERATIONAL GREENHOUSE GAS EMISSIONS – PROJECT

Emissions Sources	CO ₂ e at Buildout Year (2030) (Metric Tons per Year) ^a	
	Project with implementation of GHG reduction characteristics, features, and measures	Project without implementation of GHG reduction characteristics, features, and measures
Project Operational		
Mobile Sources	11,244 <u>12,420</u>	17,034 <u>19,216</u>
Area	107 <u>94</u>	107 <u>94</u>
Electricity	4,606 <u>4,344</u>	6,772 <u>6,389</u>
Water and Wastewater Treatment	318 <u>311</u>	396 <u>388</u>
Solid Waste	406 <u>425</u>	406 <u>425</u>
Emergency Generator	290	290
Cooling Tower	25	39
Construction (Amortized)	1,602	1,602
Project Subtotal	18,598 <u>19,511</u>	26,646 <u>28,443</u>
Existing Site (refer to Table IV.E-7)	20,386	20,386
Net Total (Project minus Existing)	(1,788) <u>(875)</u>	6,260 <u>8,057</u>

^a Totals may not add up exactly due to rounding in the modeling calculations.

SOURCE: ESA, 2023. Updated in May 2024.

40. Page IV.E-94, Subsection 3.d), Thresholds (a) and (b)(2)(b)(i), *Area Source Emissions*, revise the 2nd sentence of the paragraph as follows:

As shown in Table IV.E-11 on page IV.E-100, the Project with and without implementation of GHG reduction characteristics, features, and measures would both result in 107 94 MTCO₂e per year from area sources. Please refer to Appendix B of this Draft EIR for the supporting calculations. See Appendix C of the Final EIR for GHG emissions calculations associated with the Project with design modifications.

41. Page IV.E-94, Subsection 3.d), Thresholds (a) and (b)(2)(b)(ii), *Electricity Generation Emissions*, revise last sentence of the 1st paragraph as follows:

Future fuel consumption rates are estimated based on specific square footage of the residential, office, and restaurant/retail, ~~and hotel~~ land uses, as well as predicted water supply needs of the Project.

42. Pages IV.E-95 and IV.E-96, Subsection 3.d), Thresholds (a) and (b)(2)(b)(iii), *Electricity Generation Emissions*, revise the last paragraph starting with the 4th sentence that continues on to Page IV.E-96 as follows:

As discussed above, the future year CO₂ intensity factor of 375.93 lbs CO₂/MWh for year 2030 was scaled proportionately based on the future year renewable energy targets of 60 percent by 2030 consistent with SB 100 (refer to Appendix B for additional details).¹⁴² See Appendix C of this Final EIR for GHG emissions calculations associated with the Project with design modifications. For the Project, these features account for approximately a 32.0 percent reduction in electricity emissions and an 8.4 7.2 percent reduction in total GHG emissions in the first operational year of 2030 (detailed emissions calculations are provided in Appendix B of this Draft EIR). See Appendix C of this Final EIR for GHG calculations associated with the Project with design modifications. As shown in Table IV.E-11 on page IV.E-100, Project GHG emissions from electricity usage would result in a total of 4,606 4,344 MTCO₂e per year with implementation of GHG reduction characteristics, features, and measures, which accounts for and a reduction of 2,166 2,045 MTCO₂e per year in comparison the Project without implementation of GHG reduction characteristics, features, and measures (6,772 6,389 MTCO₂e per year).

43. Page IV.E-95, Subsection 3.d), Thresholds (a) and (b)(2)(b)(iii), *Mobile Source Emissions*, revise Footnotes 141 and 142 as follows:

¹⁴¹ Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of the Project's Draft EIR; see Appendix F of this Final EIR for the VMT analysis associated with the Project design modifications.

¹⁴² Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of the Project's Draft EIR; see Appendix F of this Final EIR for the VMT analysis associated with the Project design modifications.

44. Pages IV.E-95 and IV.E-96, Subsection 3.d), Thresholds (a) and (b)(2)(b)(iii), *Mobile Source Emissions*, revise the 3rd paragraph on page IV.E-95 that continues on to page IV.E-96 as follows:

As discussed above, based on the Project's land use characteristics, VMT reductions are expected due to the Project's infill nature, location, and design. These characteristics account for a 34.0 35.4-percent reduction in VMT and a 21.7 23.9-percent reduction in total GHG emissions in the first operational year of 2030. As shown in Table IV.E-11 on page IV.E-85, Project GHG emissions from mobile sources would result in a total of 11,244 12,420 MTCO₂e per year with implementation of GHG reduction characteristics, features, and measures, which accounts for and a reduction of 5,790 6,796 MTCO₂e per year in comparison the Project without implementation of GHG reduction characteristics, features, and measures (17,034 19,216 MTCO₂e per year).

45. Page IV.E-96, Subsection 3.d), Thresholds (a) and (b)(2)(b)(v), *Solid Waste Generation Emissions*, revise the 3rd sentence of the paragraph and add a sentence to the end of the paragraph as follows:

As shown in Table IV.E-11 on page IV.E-85, the Project with and without implementation of GHG reduction characteristics, features, and measures would both result in ~~406~~ 425 MTCO₂e per year from solid waste, which accounts for a 76-percent recycling/diversion rate.¹⁴⁶ Please refer to Appendix B of this Draft EIR for the supporting calculations that reflect the emission reduction measures. See Appendix C of this Final EIR for GHG emissions calculations associated with the Project with design modifications.

46. Page IV.E-96 and IV.E-97, Subsection 3.d), Thresholds (a) and (b)(2)(b)(vi), *Water Usage and Wastewater Generation Emissions*, add the following sentences to the 1st partial sentence and the last sentence of the 1st partial paragraph on the page as follows:

Refer to Section IV.L.1, *Utilities and Service Systems – Water Supply*, and Section IV.L.2, *Utilities and Service Systems – Wastewater*, of this Draft EIR for the estimated water usage rate for the Project. Refer to Section III, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR, for utility information related to the Project with design modifications.

47. Page IV.E-97, Subsection 3.d) Thresholds (a) and (b)(2)(b)(vi), *Water Usage and Wastewater Generation Emissions*, revise the last sentence of the 1st partial paragraph as follows:

As shown in Table IV.E-11 on page IV.E-85, Project GHG emissions associated with water demand and wastewater generation would result in a total of ~~348~~ 311 MTCO₂e per year with implementation of GHG reduction characteristics, features, and measures, which accounts for and a reduction of ~~78~~ 77 MTCO₂e per year in comparison the Project without implementation of GHG reduction characteristics, features, and measures (~~396~~ 388 MTCO₂e per year).

48. Page IV.E-97, Subsection 3.d), Thresholds (a) and (b)(2)(b)(vii), *Cooling Tower Emissions*, revise the 2nd to last sentence of the paragraph as follows:

The additional water conservation and the lower CI of electricity would account for an approximately 35.3-percent reduction in cooling tower associated GHG emissions, and an approximately ≤ 0.1 -percent reduction in total GHG emissions in the first operational year of 2030.

49. Page IV.E-98, Subsection 3.d), Thresholds (a) and (b)(2)(b)(viii), *Combined Construction and Operation Impacts*, revise the 1st paragraph and the 1st and 2nd sentence in the second paragraph and add a sentence to the end of the last paragraph as follows:

As shown in Table IV.E-11, when taking into consideration implementation of relevant project design features, as well as the requirements set forth in the City of Los Angeles Green Building Code, and full implementation of current State mandates, the Project's GHG emissions for the Project in 2030 would equal 1,602 MTCO₂e per year (amortized over 30 years) during construction and ~~16,996~~ 17,908 MTCO₂e per year during operation of the Project with a combined total of ~~18,598~~ 19,511 MTCO₂e per year.

When considering only the Project's emissions, Table IV.E-11 shows that the Project's operational emissions of ~~18,598~~ 19,511 MTCO₂e would be generated primarily by mobile sources and secondarily by energy (electricity) and in 2030 would be approximately ~~31~~0 percent below the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures (i.e., based on the quantitative reduction). The Project without implementation of GHG reduction characteristics, features, and measures does not account for land use characteristics of the Project that reduce VMT given its mix of complementary residential, ~~hotel~~, office, retail and restaurant uses, and location at an urban infill location with nearby access to public transportation.

The quantification of GHG emissions for the Project without implementation of GHG reduction characteristics, features, and measures scenario is evaluated based on the specific and defined circumstances that CARB relied on when it projected the State's GHG emissions in the absence of GHG reduction measures in the Climate Change Scoping Plan (for complete list of assumptions refer to Appendix B of this Draft EIR). See Appendix C of this Final EIR for GHG emissions calculations associated with the Project with design modifications.

50. Page IV.E-100, Subsection 3.d), Thresholds (a) and (b)(2)(c), (c) *Post Buildout Emissions*, add a sentence after the 1st sentence of the 2nd full paragraph as follows:

The *Air Quality and Greenhouse Gas Technical Documentation* appendix for the Project, which is provided in Appendix B of this Draft EIR, was prepared after thorough investigation of feasible methodologies to determine the potential GHG impacts associated with the Project. See Appendix C of this Final EIR for GHG emissions calculations associated with the Project with design modifications.

51. Page IV.E-101, Subsection 3.d), Thresholds (a) and (b)(2)(c), *Post Buildout Emissions*, revise the 8th and 9th sentences of the 1st partial paragraph as follows:

In addition, the Project would include approximately ~~742~~ 792 bicycle parking spaces, as required by LAMC Section 12.21 A.16(a)(2). Approximately ~~446~~ 163 of the total spaces

will be short-term spaces, with the remaining ~~596~~ 629 spaces designated as long-term bicycle parking spaces.

52. Page IV.E-101, Subsection 3.d), Thresholds (a) and (b)(2)(d), Conclusion, revise the 1st sentence of the paragraph as follows:

As set forth above, the Project would not generate increased GHG emissions over existing conditions.

7. Chapter IV.F Land Use and Planning

1. Page IV.F-20, Subsection 3.b)(1), *Adjacent Land Uses*, revise the subsection number and the 2nd and 3rd sentences of the 1st paragraph as follows:

~~(1)~~(2) Adjacent Land Uses

Locally, the Project Site is in a highly urbanized area and situated on the eastern border of the Central City East District of the Central City Community Plan, which is largely developed with general commercial and manufacturing uses such as wholesale, warehouse, and food processing facilities. Alameda Street, which borders the Project Site to the east, separates the Central City East District and from the Arts District. Thus, the Project Site is located adjacent to the Arts District, which is an emerging neighborhood in the City's Downtown area and has experienced an increased demand for new retail, ~~hotel~~, creative office, and residential spaces. The Project Site is also situated just south of the Little Tokyo neighborhood and west of the Arts District, where numerous former warehouse and other manufacturing/industrial structures are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses

2. Page IV.F-26, Subsection 3.d), Threshold (b)(1)(b), *City of Los Angeles General Plan Framework Element*, revise the 3rd sentence in the 1st full paragraph as follows:

Further the Project would plant ~~408~~ 439 new trees within 90,113 square feet of publicly-accessible open space, thus, adding a sustainable environment within an area currently largely devoid of such resources.

3. Page IV.F-27, Subsection 3.d), Threshold (b)(1)(c), *General Plan Open Space Element*, revise the 1st two sentences in the 1st paragraph as follows:

The Project would incorporate ~~163,325~~ 170,275 sf of usable open space for on-site residents, office workers, and ~~hotel~~ guests. Of this, approximately ~~105,218~~ 94,547 sf would be outdoor and rooftop common open space, approximately 25 percent (a minimum of ~~26,305~~ 23,637 sf) would be landscaped.

4. Page IV.F-28, Subsection 3.d), Threshold (b)(1)(e), *General Plan Housing Element*, revise the 4th sentence in the paragraph as follows:

In addition, the Project would provide ~~4,524~~ 1,589 residential units within six of the proposed buildings. ~~Six-Five~~ buildings (Buildings 1, 2, 5, 6, 7, and 9) would be mixed-use and one building (Building 10) would be all residential.

5. Page IV.F-29, Subsection 3.d), Threshold (b)(1)(f), *General Plan Health and Wellness Element (Plan for a Healthy Los Angeles)*, revise the 1st and 3rd full sentences in the 1st partial paragraph as follows:

The Project would also provide ~~445~~ 163 short-term bicycle parking spaces and ~~595~~ 629 long-term bicycle parking spaces. The proximity to transit, as well as to the City's downtown's high-density commercial and government districts would allow for walking and biking to and from work. In addition, the Project would include approximately ~~463,325~~ 170,275 sf of Code-required usable open space and approximately 90,113 sf of publicly-accessible open space, including paseos passing between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites that would allow a greater circulation of air throughout the Project Site.

6. Page IV.F-30, Subsection 3.d), Threshold (b)(1)(g), *Citywide Design Guidelines*, revise the 4th sentence in the 1st paragraph as follows:

Overall, the total tree planting for the Project would provide ~~422~~ 439 new trees and a minimum of ~~405,248~~ 94,547 sf of outdoor and rooftop common open space, approximately 25 percent of which is required to be landscaped.

7. Page IV.F-31, Subsection 3.d), Threshold (b)(1)(h), *Central City Community Plan*, revise the 1st sentence in the last paragraph as follows:

The Project would locate a high intensity development, including ~~4,524~~ 1,589 residential units; 401,101 sf of office uses; ~~and~~ 93,400 145,748 sf of restaurant/retail uses^{7b}; ~~and 68 hotel rooms~~) within downtown Los Angeles, within a designated TPA.

^{7b} The 145,748 square feet of restaurant/retail floor area includes floor area for purposes of calculating floor area per LAMC requirements. An additional potential 12,477 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter 4, *Environmental Impact Analysis*, of this Draft EIR, evaluates a total of 158,225 square feet of restaurant/retail uses. It is assumed there would be 67,595 square feet of retail uses and 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

8. Page IV.F-34, Subsection 3.d), Threshold (b)(1)(i), *DTLA 2040*, revise the 4th and 5th sentences in the 1st full paragraph as follows:

The Project would result in ~~403~~ 171 more residential units than allowed under the DTLA 2040's zoning parameters. However, housing is a priority in the City and the comparative ~~eight (8)~~ 12-percent increase is consistent with DTLA 2040 policies related to placing housing near transit facilities.

9. Page IV.F-34, Subsection 3.d), Threshold (b)(1)(j), *Central Industrial District Redevelopment Project*, revise the 2nd sentence in the 2nd paragraph as follows:

The Project would enhance the safety and security of the Project Site and surrounding area through the presence of residents (occupants of ~~1,524~~ 1,589 on-site residential units), office workers, retail workers, and visitors, ~~and hotel visitors and employees.~~

10. Page IV.F-36, Subsection 3.d), Threshold (b)(1)(k), *Adaptive Reuse Ordinance*, revise the 2nd sentence in the 1st paragraph as follows:

Further, the mixed-use character of the Project would not conflict with policies of the Ordinance to revitalize and facilitate the development of a "24-hour city" and to encourage mixed commercial and residential uses in order to improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, ~~hotels~~ and transit services near each other.

11. Page IV.F-37, Subsection 3.d), Threshold (b)(1)(l), *Los Angeles Municipal Code*, revise the last two sentences in the 1st paragraph as follows:

Because of the Industrial Designation and the FAR limitation, the Project is seeking a General Plan Amendment pursuant to LAMC Section 11.5.6 A to re-designate the underlying land use from Light Industrial to Regional Commercial, and a Vesting Zone Change and Height District Change pursuant to LAMC Sections 12.32 F and 12.32 Q, to change the zone from M2-2D/M2-2D-O to ~~C2-2~~ C2-3D, ~~which involves removing the D Development Limitation.~~ The Project is located within the Framework Element's Downtown Center and would be consistent with the General Plan designation that supports ~~hotels~~, professional offices, corporate headquarters, and high-rise residential towers within the Downtown Center.

12. Page IV.F-37, Subsection 3.d), Threshold (b)(1)(l), *Los Angeles Municipal Code*, remove the last sentence in the 3rd paragraph as follows:

~~The Project would also enter into a Development Agreement pursuant to Government Code Sections 65864 et seq.~~

8. Chapter IV.G Noise

1. Page IV.G-1, Subsection 1, *Introduction*, add a sentence at the end of the paragraph as follows:

This section summarizes the noise and vibration information included in the Noise and Vibration Worksheets in Appendix G of the Draft EIR. See Appendix E of this Final EIR for noise calculations associated with the Project with design modifications.

2. Page IV.G-33, Subsection 3.b)(2), *Off-Site Roadway Noise (Construction and Operation)*, revise footnotes as follows:

⁴⁸ Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, ~~March-June~~ 2022. Provided in Appendix J of the Project's Draft EIR. See Appendix F of the Final EIR for the peak hour volume analysis associated with the Project design modifications.

⁴⁹ Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, ~~March-June~~ 2022. Provided in Appendix J of the Project's Draft EIR. See Appendix F of the Final EIR for the peak hour volume analysis associated with the Project design modifications.

3. Page IV.G-43, Subsection 3.d), Threshold (a)(1)(a)(ii)(b), *Foundations Concrete Pour Trucks*, revise footnote as follows:

⁵⁶ Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, ~~March-June~~ 2022. Provided in Appendix J of the Project's Draft EIR. See Appendix F of the Final EIR for the peak hour volume analysis associated with the Project Design modifications.

4. Page IV.G-54, Subsection 3.d), Threshold (a)(1)(b)(v), *Off-Site Operation Traffic Noise*, revise the 2nd sentence of 2nd paragraph as follows:

As shown in Table IV.G-16, traffic from the Project would result in a maximum noise increase of ~~0.9~~ 1.1 dBA along Central Avenue (between 4th Street and 5th Street/Project South Driveway).

5. Page IV.G-55 to IV.G-57, Subsection 3.d), Threshold (a)(1)(b)(v), *Off-Site Operation Traffic Noise*, revise Table IV.G-16 as follows:

See revised Table IV.G-16 on the following page.

TABLE IV.G-16
OFF-SITE ROADWAY TRAFFIC NOISE IMPACTS – EXISTING PLUS PROJECT CONDITIONS

Roadway Segment	Adjacent Land Use	CNEL (dBA)			Exceed Threshold? ^b
		Existing ^a (A)	Existing + Project (B)	Project Increment (B-A) ^c	
1st Street					
Between Central Avenue and Alameda Street	Commercial/ Institutional	69.5	69.6	0.1	No
East of Alameda Street	Residential/ Commercial	68.6	68.8	0.2	No
2nd Street					
Between Central Avenue and Alameda Street	Commercial	67.0	67.1	0.1	No
East of Alameda Street	Residential/ Commercial	65.2	65.2	0.0	No
3rd Street					
Between Central Avenue and Alameda Street	Residential/ Commercial	71.8	~~71.8~~ <u>71.9</u>	~~0.0~~ <u>0.1</u>	No
Between San Pedro St and Central Avenue	Institutional/ Religious/ Commercial	71.8	71.9	0.1	No
West of San Pedro St	Residential/ Commercial	70.9	~~0.9~~ <u>71.0</u>	0.1	No
3rd Street/4th Place					
Between Hewitt St and Merrick Street/Molino Street	Commercial/ Motel	69.8	~~70.0~~ <u>70.1</u>	~~0.2~~ <u>0.3</u>	No
4th Street/4th Place					
Between Hewitt St and Merrick Street/Molino Street	Residential	72.1	72.4	0.3	No
4th Street					
Between Alameda Street and Hewitt St	Residential/ Commercial	71.0	71.4	0.4	No
Between Central Avenue and Alameda Street	Industrial/ Commercial	70.4	~~70.5~~ <u>70.6</u>	0.2	No
Between San Pedro St and Central Avenue	Industrial/ Commercial	70.1	~~70.3~~ <u>70.4</u>	0.3	No
East of Merrick Street/Molino Street	Industrial/ Commercial	72.3	72.6	~~0.2~~ <u>0.3</u>	No
West of San Pedro St	Commercial	70.0	70.2	0.2	No
5th Street					
Between San Pedro St and Central Avenue	Commercial/ Residential	65.4	65.7	0.3	No
West of San Pedro St	Commercial/ Residential	65.1	~~65.4~~ <u>65.5</u>	~~0.3~~ <u>0.4</u>	No

TABLE IV.G-16
OFF-SITE ROADWAY TRAFFIC NOISE IMPACTS – EXISTING PLUS PROJECT CONDITIONS

Roadway Segment	Adjacent Land Use	CNEL (dBA)			Exceed Threshold? ^b
		Existing ^a (A)	Existing + Project (B)	Project Increment (B-A) ^c	
6th Street					
Between Central Avenue and Alameda Street	Industrial/ Commercial	69.0	69.1	0.1	No
East of Alameda Street	Industrial/ Commercial	68.5	68.6	0.2	No
West of Central Avenue	Commercial/ Residential	67.6	~~68.0~~ <u>68.1</u>	~~0.4~~ <u>0.5</u>	No
7th Street					
Between Central Avenue and Alameda Street	Industrial/ Commercial	69.6	69.7	0.1	No
East of Alameda Street	Industrial/ Commercial	69.7	69.9	0.2	No
West of Central Avenue	Commercial/ Residential	69.6	69.7	0.2	No
Alameda Street					
Between 1st Street and 2nd Street	Commercial/ Residential	72.6	72.9	0.3	No
Between 2nd Street and 3rd Street/4th Place	Commercial/ Residential	72.2	72.6	0.4	No
Between 3rd Street/4th Place and 4th Street	Commercial/ Residential	72.3	72.9	0.6	No
Between 4th Street and 6th Street	Industrial/ Commercial	72.0	72.6	0.6	No
Between 6th Street and 7th Street	Industrial/ Commercial	71.8	72.1	0.3	No
North of 1st Street	Institutional/ Commercial	72.9	73.2	0.3	No
South of 7th Street	Industrial/ Commercial	72.0	72.2	0.2	No
Central Avenue					
Between 1st Street and 2nd Street	Commercial/ Residential	67.5	~~68.3~~ <u>68.4</u>	~~0.8~~ <u>0.9</u>	No
Between 2nd Street and 3rd Street	Commercial/ Residential	70.0	70.5	0.5	No
Between 3rd Street and 4th Street	Industrial/ Commercial	70.1	~~70.8~~ <u>71.0</u>	~~0.7~~ <u>0.9</u>	No
Between 4th Street and 5th Street/Project South Site Driveway	Industrial/ Commercial	69.8	~~70.7~~ <u>70.9</u>	~~0.9~~ <u>1.1</u>	No
Between 5th Street/Project South Site Driveway and 6th Street	Industrial/ Commercial	71.6	~~72.1~~ <u>72.3</u>	~~0.6~~ <u>0.7</u>	No
Between 6th Street and 7th Street	Industrial/ Commercial	71.2	~~71.6~~ <u>71.7</u>	~~0.4~~ <u>0.5</u>	No
South of 7th Street	Industrial/ Commercial	71.5	71.8	~~0.2~~ <u>0.3</u>	No

TABLE IV.G-16
OFF-SITE ROADWAY TRAFFIC NOISE IMPACTS – EXISTING PLUS PROJECT CONDITIONS

Roadway Segment	Adjacent Land Use	CNEL (dBA)			Exceed Threshold? ^b
		Existing ^a (A)	Existing + Project (B)	Project Increment (B-A) ^c	
Merrick Street/Molino Street					
North of 4th Street	Industrial/ Commercial	59.1	59.1	0.0	No
South of 4th Street	Industrial/ Commercial	56.5	56.5	0.0	No
San Pedro Street					
Between 3rd Street and 4th Street	Industrial/ Commercial	69.9	69.9	0.0	No
Between 4th Street and 5th Street	Commercial/ Residential	70.1	70.2	0.1	No
North of 3rd Street	Commercial/ Residential/ Religious	69.3	69.3	0.0	No
South of 5th Street	Commercial/ Residential/ Religious	70.2	70.3	0.1	No

NOTES:

^a Calculated based on existing traffic volumes.^b See Table IV.G-4 for a description of the compatibility categories.^c Totals may not add up exactly due to rounding to one decimal point.SOURCE: ESA 2022. Updated in May 2024.

6. Page IV.G-57, Subsection 3.d), Threshold (a)(1)(b)(v), *Off-Site Operation Traffic Noise*, revise the last sentence of the paragraph as follows:

As shown in Table IV.G-17, traffic noise from the Project would result in an increase of ~~0.8~~ 1.0 dBA along Central Avenue (between 4th Street and 5th Street/South Site Project Driveway).

7. Page IV.G-58 to IV.G-60, Subsection 3.d), Threshold (a)(1)(b)(v), (v) *Off-Site Operation Traffic Noise*, revise Table IV.G-17 as follows:

See revised Table IV.G-17 on the following page.

TABLE IV.G-17
OFF-SITE ROADWAY TRAFFIC NOISE IMPACTS – FUTURE (2030) PLUS PROJECT CONDITIONS

Roadway Segment	Adjacent Land Use	CNEL (dBA)			Exceed Threshold? ^b
		Future Baseline ^a (A)	Future + Project (B)	Project Increment (B-A) ^c	
1st Street					
Between Central Avenue and Alameda Street	Commercial/ Institutional	70.0	70.1	0.1	No
East of Alameda Street	Residential/ Commercial	69.1	69.3	~~0.1~~ <u>0.2</u>	No
2nd Street					
Between Central Avenue and Alameda Street	Commercial	67.7	67.8	0.1	No
East of Alameda Street	Residential/ Commercial	65.8	65.8	0.0	No
3rd Street					
Between Central Avenue and Alameda Street	Residential/ Commercial	72.5	72.5	0.0	No
Between San Pedro St and Central Avenue	Institutional/ Religious/ Commercial	72.5	72.6	0.1	No
West of San Pedro St	Residential/ Commercial	71.7	~~71.7~~ <u>71.8</u>	0.1	No
3rd Street/4th Place					
Between Hewitt St and Merrick Street/Molino Street	Commercial/ Motel	70.4	70.6	0.2	No
4th Street/4th Place					
Between Hewitt St and Merrick Street/Molino Street	Residential	73.0	73.2	0.2	No
4th Street					
Between Alameda Street and Hewitt St	Residential/ Commercial	72.1	~~72.3~~ <u>72.4</u>	0.3	No
Between Central Avenue and Alameda Street	Industrial/ Commercial	71.2	~~71.3~~ <u>71.4</u>	~~0.1~~ <u>0.2</u>	No
Between San Pedro St and Central Avenue	Industrial/ Commercial	71.0	71.2	0.2	No
East of Merrick Street/Molino Street	Industrial/ Commercial	73.3	73.5	0.2	No
West of San Pedro St	Commercial	70.9	~~71.0~~ <u>71.1</u>	0.2	No

TABLE IV.G-17
OFF-SITE ROADWAY TRAFFIC NOISE IMPACTS – FUTURE (2030) PLUS PROJECT CONDITIONS

Roadway Segment	Adjacent Land Use	CNEL (dBA)			Exceed Threshold? ^b
		Future Baseline ^a (A)	Future + Project (B)	Project Increment (B-A) ^c	
5th Street					
Between San Pedro St and Central Avenue	Commercial/Residential	66.4	66.6	0.2	No
West of San Pedro St	Commercial/Residential	66.0	66.3	0.3	No
6th Street					
Between Central Avenue and Alameda Street	Industrial/Commercial	70.2	70.3	0.1	No
East of Alameda Street	Industrial/Commercial	70.7	70.8	0.1	No
West of Central Avenue	Commercial/Residential	68.9	~~69.2~~ <u>69.3</u>	~~0.3~~ <u>0.4</u>	No
7th Street					
Between Central Avenue and Alameda Street	Industrial/Commercial	71.0	~~71.0~~ <u>71.1</u>	0.1	No
East of Alameda Street	Industrial/Commercial	71.4	71.5	0.1	No
West of Central Avenue	Commercial/Residential	70.8	71.0	0.1	No
Alameda Street					
Between 1st Street and 2nd Street	Commercial/Residential	73.7	73.9	0.3	No
Between 2nd Street and 3rd Street/4th Place	Commercial/Residential	73.4	73.7	0.3	No
Between 3rd Street/4th Place and 4th Street	Commercial/Residential	73.7	~~74.1~~ <u>74.2</u>	~~0.4~~ <u>0.5</u>	No
Between 4th Street and 6th Street	Industrial/Commercial	73.6	74.0	0.4	No
Between 6th Street and 7th Street	Industrial/Commercial	73.2	73.5	0.3	No
North of 1st Street	Institutional/Commercial	74.1	74.3	0.2	No
South of 7th Street	Industrial/Commercial	73.2	73.3	0.2	No

TABLE IV.G-17
OFF-SITE ROADWAY TRAFFIC NOISE IMPACTS – FUTURE (2030) PLUS PROJECT CONDITIONS

Roadway Segment	Adjacent Land Use	CNEL (dBA)			Exceed Threshold? ^b
		Future Baseline ^a (A)	Future + Project (B)	Project Increment (B-A) ^c	
Central Avenue					
Between 1st Street and 2nd Street	Commercial/ Residential	68.1	~~68.7~~ <u>68.8</u>	~~0.7~~ <u>0.8</u>	No
Between 2nd Street and 3rd Street	Commercial/ Residential	70.5	70.9	0.4	No
Between 3rd Street and 4th Street	Industrial/ Commercial	70.6	~~71.2~~ <u>71.4</u>	~~0.6~~ <u>0.8</u>	No
Between 4th Street and 5th Street/Project South Site Driveway	Industrial/ Commercial	70.4	~~71.2~~ <u>71.4</u>	~~0.8~~ <u>1.0</u>	No
Between 5th Street/Project South Site Driveway and 6th Street	Industrial/ Commercial	72.2	~~72.7~~ <u>72.8</u>	~~0.5~~ <u>0.6</u>	No
Between 6th Street and 7th Street	Industrial/ Commercial	72.1	72.5	~~0.3~~ <u>0.4</u>	No
South of 7th Street	Industrial/ Commercial	72.2	72.4	0.2	No
Merrick Street/Molino Street					
North of 4th Street	Industrial/ Commercial	59.4	59.4	0.0	No
South of 4th Street	Industrial/ Commercial	60.7	60.7	0.0	No
San Pedro Street					
Between 3rd Street and 4th Street	Industrial/ Commercial	70.6	70.6	0.0	No
Between 4th Street and 5th Street	Commercial/ Residential	70.8	70.8	0.1	No
North of 3rd Street	Commercial/ Residential/ Religious	70.0	70.0	0.0	No
South of 5th Street	Commercial/ Residential/ Religious	70.9	71.0	0.1	No

NOTES:

^a Calculated based on future (2030) traffic volumes.^b See Table IV.G-4 for a description of the compatibility categories.^c Totals may not add up exactly due to rounding to one decimal point.

SOURCE: ESA 2022. Updated in May 2024.

8. Page IV.G-70, Subsection 3.d), Threshold (b)(1)(a)(i), *Structural Damage, Construction*, revise Table IV.G-23 as follows:

TABLE IV.G-23
CONSTRUCTION VIBRATION IMPACTS – STRUCTURAL DAMAGE

Nearest Off-Site Building Structures	Distance to Receptor Building (ft)	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from Project Construction Equipment, ^{ba} inch/second (PPV)					Significance Threshold, inch/second (PPV)	Maximum Exceedance over Significance Threshold (PPV)	Significant Impacts?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer			
V1: Warehouse/industrial building north of the Project's North Site.	25	0.089	0.089	0.076	0.035	0.003	0.30 ^{ba}	0.0	No
V2: Parking structure to the east of the Project's North Site.	25	0.089	0.089	0.076	0.035	0.003	0.50 ^{eb}	0.0	No
V3: Commercial buildings to the south, west, and southwest of Project's West Site.	10	0.352	0.352	0.300	0.138	0.012	0.20 ^{ec}	0.052	Yes
V4: Historic District Warehouse/industrial buildings to the east of the Project's Upper South and Lower South Sites.	95	0.012	0.012	0.010	0.005	<0.001	0.12 ^{ed}	0.0	No
V5: Multi-family residential building to the east of the Project's Upper South Site and North Site along 4th Street.	250	0.003	0.003	0.002	0.001	<0.001	0.20 ^{ec}	0.0	No
V6: Hotel use and commercial/industrial buildings to the west of the Project's Upper South Site and North Site along 4th Street.	175	0.005	0.005	0.004	0.002	<0.001	0.20 ^{ec}	0.0	No
V7: Historic Produce Exchange Building to the northwest of the Project's North Site along Central Avenue	230	0.003	0.003	0.003	0.001	0.001	0.12 ^{ed}	0.0	No

NOTES: Bolded values represent vibration levels over threshold

^a ~~Vibration level calculated based on FTA reference vibration level at 25-foot distance.~~

^{ab} FTA criteria for engineered concrete and masonry buildings.

^{be} FTA criteria for reinforced concrete, steel or timber buildings.

^{cd} FTA criteria for non-engineered timber and masonry buildings.

^{de} FTA criteria for historic buildings.

SOURCE: ESA, 2022

9. Page IV.G-74, Subsection 3.d), Threshold (b)(3)(a), *Construction Structural Damage*, revise the paragraph as follows:

Regarding impacts due to structural damage, Mitigation Measure NOI-MM-6 prohibits the use of vibratory construction equipment at distances that would result in significant impacts to the V3. Mitigated construction vibration velocities are shown in **Table IV.G-25, Mitigated Construction Vibration Impacts – Building Damage**. With implementation of Mitigation Measure NOI-MM-56, potential structural vibration impacts on receptor V3 would be mitigated to a less than significant level.

10. Page IV.G-80 to IV.G-82, Subsection 3.e)(1)(b)(ii), *Off-Site Operation Traffic Noise*, revise Table IV.G-27 as follows:

TABLE IV.G-27
CUMULATIVE OFF-SITE ROADWAY TRAFFIC NOISE IMPACTS

Roadway Segment	Adjacent Land Use	CNEL (dBA)				
		Existing (A)	Cumulative Year (2030) + Project (B)	Increase over Existing (B-A) ^a	Project Increment	Exceed Threshold?
1st Street						
Between Central Avenue and Alameda Street	Commercial/ Institutional	69.5	70.1	0.6	~~0.4~~	No
East of Alameda Street	Residential/ Commercial	68.6	69.3	~~0.6~~ <u>0.7</u>	~~0.2~~	No
2nd Street						
Between Central Avenue and Alameda Street	Commercial	67.0	67.8	~~0.7~~ <u>0.8</u>	~~0.4~~	No
East of Alameda Street	Residential/ Commercial	65.2	65.8	~~0.7~~ <u>0.6</u>	~~0.0~~	No
3rd Street						
Between Central Avenue and Alameda Street	Residential/ Commercial	71.8	72.5	0.7	~~0.0~~	No
Between San Pedro St and Central Avenue	Institutional/ Religious/ Commercial	71.8	72.6	0.8	~~0.4~~	No
West of San Pedro St	Residential/ Commercial	70.9	~~71.7~~ <u>71.8</u>	0.9	~~0.4~~	No
3rd Street/4th Place						
Between Hewitt St and Merrick Street/Molino Street	Commercial/ Motel	69.8	70.6	0.8	~~0.2~~	No

**TABLE IV.G-27
CUMULATIVE OFF-SITE ROADWAY TRAFFIC NOISE IMPACTS**

Roadway Segment	Adjacent Land Use	CNEL (dBA)				Exceed Threshold?
		Existing (A)	Cumulative Year (2030) + Project (B)	Increase over Existing (B-A) ^a	Project Increment	
4th Street/4th Place						
Between Hewitt St and Merrick Street/Molino Street	Residential	72.1	73.2	~~1.0~~ <u>1.1</u>	~~0.3~~	No
4th Street						
Between Alameda Street and Hewitt St	Residential/ Commercial	71.0	~~72.3~~ <u>72.4</u>	1.4	~~0.4~~	No
Between Central Avenue and Alameda Street	Industrial/ Commercial	70.4	~~71.3~~ <u>71.4</u>	1.0	~~0.2~~	No
Between San Pedro St and Central Avenue	Industrial/ Commercial	70.1	71.2	1.1	~~0.3~~	No
East of Merrick Street/Molino Street	Industrial/ Commercial	72.3	73.5	1.2	~~0.2~~	No
West of San Pedro St	Commercial	70.0	~~71.0~~ <u>71.1</u>	1.1	~~0.2~~	No
5th Street						
Between San Pedro St and Central Avenue	Commercial/ Residential	65.4	66.6	1.2	~~0.3~~	No
West of San Pedro St	Commercial/ Residential	65.1	66.3	1.2	~~0.3~~	No
6th Street						
Between Central Avenue and Alameda Street	Industrial/ Commercial	69.0	70.3	1.3	~~0.4~~	No
East of Alameda Street	Industrial/ Commercial	68.5	70.8	2.3	~~0.2~~	No
West of Central Avenue	Commercial/ Residential	67.6	~~69.2~~ <u>69.3</u>	1.7	~~0.4~~	No
7th Street						
Between Central Avenue and Alameda Street	Industrial/ Commercial	69.6	~~71.0~~ <u>71.1</u>	1.5	~~0.4~~	No
East of Alameda Street	Industrial/ Commercial	69.7	71.5	1.8	~~0.2~~	No
West of Central Avenue	Commercial/ Residential	69.6	71.0	1.4	~~0.2~~	No

**TABLE IV.G-27
CUMULATIVE OFF-SITE ROADWAY TRAFFIC NOISE IMPACTS**

Roadway Segment	Adjacent Land Use	CNEL (dBA)				
		Existing (A)	Cumulative Year (2030) + Project (B)	Increase over Existing (B-A) ^a	Project Increment	Exceed Threshold?
Alameda Street						
Between 1st Street and 2nd Street	Commercial/ Residential	72.6	73.9	1.3	~~0.3~~	No
Between 2nd Street and 3rd Street/4th Place	Commercial/ Residential	72.2	73.7	1.5	~~0.4~~	No
Between 3rd Street/4th Place and 4th Street	Commercial/ Residential	72.3	~~74.1~~ <u>74.2</u>	1.8	~~0.6~~	No
Between 4th Street and 6th Street	Industrial/ Commercial	72.0	74.0	2.0	~~0.6~~	No
Between 6th Street and 7th Street	Industrial/ Commercial	71.8	73.5	1.7	~~0.3~~	No
North of 1st Street	Institutional/ Commercial	72.9	74.3	1.4	~~0.3~~	No
South of 7th Street	Industrial/ Commercial	72.0	73.3	1.3	~~0.2~~	No
Central Avenue						
Between 1st Street and 2nd Street	Commercial/ Residential	67.5	~~68.7~~ <u>68.8</u>	~~1.2~~ <u>1.3</u>	~~0.8~~	No
Between 2nd Street and 3rd Street	Commercial/ Residential	70.0	70.9	0.9	~~0.5~~	No
Between 3rd Street and 4th Street	Industrial/ Commercial	70.1	~~71.2~~ <u>71.4</u>	~~1.1~~ <u>1.3</u>	~~0.7~~	No
Between 4th Street and 5th Street/Project South Site Driveway	Industrial/ Commercial	69.8	~~71.2~~ <u>71.4</u>	~~1.4~~ <u>1.6</u>	~~0.9~~	No
Between 5th Street/Project South Site Driveway and 6th Street	Industrial/ Commercial	71.6	~~72.7~~ <u>72.8</u>	~~1.1~~ <u>1.2</u>	~~0.6~~	No
Between 6th Street and 7th Street	Industrial/ Commercial	71.2	72.5	~~1.2~~ <u>1.3</u>	~~0.4~~	No
South of 7th Street	Industrial/Co mmercial	71.5	72.4	0.9	~~0.2~~	No
Merrick Street/Molino Street						
North of 4th Street	Industrial/ Commercial	59.1	59.4	0.4	~~0.0~~	No

**TABLE IV.G-27
CUMULATIVE OFF-SITE ROADWAY TRAFFIC NOISE IMPACTS**

Roadway Segment	Adjacent Land Use	CNEL (dBA)				Exceed Threshold?
		Existing (A)	Cumulative Year (2030) + Project (B)	Increase over Existing (B-A) ^a	Project Increment	
South of 4th Street	Industrial/Commercial	56.5	60.7	4.2	0.0	No
San Pedro Street						
Between 3rd Street and 4th Street	Industrial/Commercial	69.9	70.6	0.7	0.0	No
Between 4th Street and 5th Street	Commercial/Residential	70.1	70.8	0.7	0.1	No
North of 3rd Street	Commercial/Residential/Religious	69.3	70.0	0.7	0.0	No
South of 5th Street	Commercial/Residential/Religious	70.2	71.0	0.8	0.1	No

^a Totals may not add up exactly due to rounding to one decimal point.

SOURCE: ESA 2022. Updated in May 2024.

11. Page IV.G-83, Subsection 3.e)(1)(c), *Construction - Groundborne Vibration*, revise the 2nd, 4th, and 5th sentences of the paragraph as follows:

Due to rapid attenuation characteristics of groundborne vibration, only related projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. ~~None of the related projects are located adjacent to the sensitive receptors identified for the Project.~~ The Project and Related Project Nos. 9, 18, and 29 are both adjacent to sensitive receptor V3. At this distance a distance of 10 feet (see Table IV.G-23), the vibration levels from the Project could result in cumulatively considerable vibration levels at receptor location V3 when combined with Related Project Nos. 9, 18, and 29. At the distances described above, operation of vibratory construction equipment could exceed structural damage or human annoyance thresholds.

12. Page IV.G-83, Subsection 3.e)(2), *Mitigation Measures*, revise the 3rd sentence of the 2nd paragraph as follows:

With implementation of Mitigation Measure NOI-MM-4, Project-level impacts would be reduced to less-than-significant levels.

13. Page IV.G-85, Subsection 3.e)(3)(a)(ii), *Off-Site Construction Noise*, revise the 1st and 2nd paragraphs as follows:

For Project-related haul trucks, ~~with implementation of Mitigation Measure NOI-MM-4, Project haul trucks would be prohibited from traveling on Central Avenue between 1st Street and 2nd Street, which would mitigate the Project-level impacts would be to less than significant. However, if the related projects would contribute 31 truck trips per hour or more and travel along the same roadway segments as the Project an additional 130 trips per hour along 1st Street east of Alameda Street, 137 truck trips per hour along Central Avenue between 1st Street and 2nd Street, 122 trips per hour along Central Avenue between 2nd Street and 3rd Street, 171 trips per hour along 4th Street between Hewitt Street and Merrick/Molino Street, and 112 trips per hour along 4th Street between Alameda Street and Hewitt Street (see roadway segments in Table IV.G-10), the combined off-site construction noise from Project haul trucks and related project trucks could exceed the significance threshold.~~

For Project-related foundation concrete pour trucks, ~~there is no feasible mitigation measure that would reduce the Project-level impact to below the significance thresholds. Mitigation Measure NOI-MM-4 would reduce concrete truck trips along the identified segments to less than significant on a project-level. However, Therefore,~~ related projects contributing any additional truck trips on the same roadway segments at the same time as the Project (see roadway segments in Table IV.G-10) would generate a cumulative noise impact along these same roadway segments.

14. Page IV.G-85 and IV.G-86, Subsection 3.e)(3)(c), *Construction Groundborne Vibration*, revise the 1st and 2nd paragraphs as follows:

The Project would implement Mitigation Measures NOI-MM-6 and NOI-MM-7 to reduce construction vibration impacts. Implementation of these mitigation measures would reduce impacts to a less-than-significant level, but because implementation of these measures requires the consent of private property owners, which cannot be assured, but not eliminate, the Project's ground-level~~borne~~ construction vibration impacts at receptor location V3 ~~but impacts would remain significant and unavoidable.~~

Although it is expected that ~~the related projects~~ Related Project Nos. 9, 18, and 29 listed in Table IV.G-26 with identified significant impacts would implement mitigation that would reduce construction structural vibration impacts similar to the Project, overlapping construction activities could result in significant cumulative impacts. As previously explained, the Project and ~~the related projects~~ Related Project Nos. 9, 18, and 29 in Table IV.G-26 could together contribute to construction vibration at receptor V3 that may exceed the structural vibration significance threshold. **Thus, it is conservatively concluded that the Project's contribution to cumulative construction vibration associated with on-site construction equipment would be cumulatively considerable and would represent a significant and unavoidable cumulative impact.**

9. Chapter IV.H Population and Housing

1. Page IV.H-17, Subsection 3(b), *Methodology*, revise the 2nd sentence in the 1st full paragraph as follows:

Note that as the Project proposes a mix of ~~4,156~~ 1,248 dwelling units with three or less habitable rooms, ~~365~~ 341 dwelling units with greater than three habitable rooms, the citywide number of 2.25 used in the analysis below provides for a conservative estimate that likely overstates the Project's actual population.

2. Page IV.H-18, Subsection 3.d), Threshold (a)(1)(b)(i), *Project Population, Housing, and Employment Generation*, revise the 1st sentence in the 1st paragraph as follows:

With Project implementation, the Project Site would be developed with approximately ~~4,524~~ 1,589 multi-family residential dwelling units, 411,113 square feet of office, and ~~413,565~~ 158,225 square feet of retail/restaurant, ~~and 68 hotel rooms (74,484 square feet).~~

3. Page IV.H-19, Subsection 3.d), Threshold (a)(1)(b)(i), *Project Population, Housing, and Employment Generation*, Table IV.H-2, *Estimate of Project Population and Housing*, revise the row in the table as follows:

TABLE IV.H-2
ESTIMATE OF PROJECT POPULATION AND HOUSING

Total Housing Units	Average Household Size ^a	Total Population
~~4,524~~ <u>1,589</u>	2.25	~~3,423~~ <u>3,576</u>

NOTE(S):

^a Based on the Population Per Unit Factor for multi-family units within the City of Los Angeles VMT Calculator Documentation, which assumes an average household size of 2.25 population.

SOURCE: ESA, 2022. Updated in May 2024.

4. Page IV.H-19, Subsection 3.d), Threshold (a)(1)(b)(i), *Project Population, Housing, and Employment Generation*, Table IV.H-3, *Estimate of Project Employment*, revise the table rows in the table as follows:

**TABLE IV.H-3
ESTIMATE OF PROJECT EMPLOYMENT**

Use	Number of Employees
<i>Project Employees</i>	2,044 <u>2,142</u> ^a
Existing Uses	69 ^b
Net New Employees	1,975 <u>2,073</u>

NOTE(S):

sf = square feet; rm = room; emp = employee; ksf = 1,000 square feet

^a Employment for Project uses taken from VMT Calculator worksheets in Appendix F of the TA. The TA is provided in Appendix J of this Draft EIR. Also, a breakdown of employees by land use is provided in Table IV.L.3 3, Estimated Operational Solid Waste Generation, in Section IV.L-3, Utilities and Service Systems – Solid Waste, of this Draft EIR. See Appendix F of this Final EIR for revised VMT calculations associated with the Project with design modifications.

^b Existing employees provided by current site operator.

SOURCE: ESA, 2022. Updated in May 2024.

5. Page IV.H-20, Subsection 3.d), Threshold (a)(1)(b)(i)(a), *Population*, Table IV.H-4, *Project Population, Housing, and Employment Percentages for the City of Los Angeles*, revise the table rows in the table as follows:

**TABLE IV.H-4
PROJECT POPULATION, HOUSING, AND EMPLOYMENT PERCENTAGES FOR THE CITY OF
LOS ANGELES**

	Project Increase^a	SCAG Projected Growth^b	Project Percentage of Growth^c
Population			
2022–2030 Earliest Buildout	~~3,423~~ <u>3,576</u>	231,034	1.5%
2022–2045 Projection Horizon	~~3,423~~ <u>3,576</u>	664,224	0.5%
Households			
2022–2030 Earliest Buildout	~~1,521~~ <u>1,589</u>	117,517	~~1.3~~ <u>1.4</u> %
2022–2045 Projection Horizon	~~1,521~~ <u>1,589</u>	337,862	0.5%
Employment			
2022–2030 Earliest Buildout	~~1,975~~ <u>2,073</u>	79,337	~~2.5~~ <u>2.6</u> %
2022–2045 Projection Horizon	~~1,975~~ <u>2,073</u>	228,096	0.9%

NOTE(S):

^a From Table IV.H-2 for population and housing, and Table IV.H-3 for employment.

^b From Table IV.H-1.

^c Percentages are rounded to the nearest tenth.

SOURCE: ESA, 2022. Updated in May 2024.

6. Page IV.H-20, Subsection 3.d), Threshold (a)(1)(b)(i)(a), *Population*, revise the 1st paragraph as follows:

As shown in Table IV.H-4, the Project's ~~3,423~~ 3,576 residents with potential buildout in 2030 (Earliest Project Buildout year) would comprise approximately 1.5 percent of SCAG's estimated population growth by 2030. SCAG's longer-term projected population increase for the City in 2045 shows an additional 664,224 residents for a total residential population of 4,338,110; therefore, the Project would comprise approximately 0.5 percent of SCAG's total population increase for the City between 2022 and 2045.

7. Page IV.H-21, Subsection 3.d), Threshold (a)(1)(b)(i)(b), *Housing*, revise the 1st and 3rd sentences in the 1st paragraph as follows:

As shown in Table IV.H-4, the Project's proposed ~~4,524~~ 1,589 housing units would comprise ~~4.3~~ 1.4 percent of SCAG's year 2030 estimated increase of 117,517 households within the City. The Project would comprise 0.5 percent of SCAG's 2045 estimated increase of 337,862 households within the City. The Project would result in population growth directly through the introduction of ~~4,524~~ 1,589 housing units on the Project Site which currently has no residential uses.

8. Page IV.H-22, Subsection 3.d), Threshold (a)(1)(b)(i)(c), *Employment*, revise the 1st sentence in the 1st paragraph as follows:

As shown in Table IV.H-3, the Project would generate a net total of ~~4,975~~ 2,073 employees, which would comprise ~~2.5~~ 2.6 percent of SCAG's year 2030 estimated growth of 79,337 employees within the City.

9. Page IV.H-22, Subsection 3.d), Threshold (a)(1)(b)(i)(c), *Employment*, revise the 1st sentence in the 3rd paragraph as follows:

Based on the 2022 employment and household estimates presented in Table IV.H-1, above, the 2022 jobs/housing ratio in the City is 1.31.³⁴ The projected 2030 estimate for the City would be decreased slightly to 1.26.³⁵ The projected 2045 estimate is 1.19.³⁶ Inclusion of the Project to the City's employment and household numbers would incrementally increase the 2022 jobs/housing ratio in the City to 1.32, and maintain the jobs/housing ratio of 1.31, 1.26, and 1.19 for 2022, 2030, and 2045, respectively.

10. Page IV.H-25, Subsection 3.e)(1)(b), *Operation*, Table IV.H-5, *Total Cumulative Development*, revise the table rows in the table as follows:

**TABLE IV.H-5
TOTAL CUMULATIVE DEVELOPMENT**

Development^a	Population^b	Housing Units^b	Employment^b
Related Projects	17,245	7,660	12,491
Proposed Project - Total Buildout	~~3,423~~ <u>3,576</u>	~~1,521~~ <u>1,589</u>	~~1,975~~ <u>2,073</u>
Total Cumulative Growth	~~20,668~~ <u>20,820</u>	~~9,181~~ <u>9,249</u>	~~14,466~~ <u>14,564</u>

NOTE(S):

^a A list of the related projects is provided in Table III-1 of Chapter III, *Environmental Setting*, of this Draft EIR.

^b The calculations for housing, population, and employment are presented in Appendix H of this Draft EIR.

SOURCE: ESA, 2023. Updated in May 2024.

11. Page IV.H-26, Subsection 3.e)(1)(b), *Operation*, Table IV.H-6, *Cumulative Population, Housing and Employment*, revise the table rows in the table as follows:

**TABLE IV.H-6
CUMULATIVE POPULATION, HOUSING AND EMPLOYMENT**

	Cumulative Increase Including Proposed Project^a	SCAG Projected Growth^b	Cumulative Percentage of Growth^c
Population	~~20,668~~ <u>20,820</u>	664,224	3.1%
Households	~~9,181~~ <u>9,249</u>	337,862	2.7%
Employment	~~14,466~~ <u>14,564</u>	228,096	6.4%

NOTE(S):

^a From Table IV.H-5.

^b From Table IV.H-1.

^c Percentages are rounded to the nearest tenth.

SOURCE: ESA, 2023. Updated in May 2024.

12. Page IV.H-26, Subsection 3.e)(1)(b)(i), *Population*, revise the 1st paragraph as follows:

As indicated in Table IV.H-6, the Project and related projects' cumulative population growth of ~~20,668~~ 20,820 is equal to 3.1 percent of the population growth estimated in the SCAG projection for the City by the 2045 horizon year.

13. Page IV.H-27, Subsection 3.e)(1)(b)(ii), *Housing*, revise the paragraph as follows:

The Project and related projects would result in the construction of approximately ~~9,484~~ 9,249 dwelling units within the City, which is 2.7 percent of Citywide projected housing growth by the year 2045.

14. Page IV.H-27, Subsection 3.e)(1)(b)(iii), *Employment*, revise the paragraph as follows:

The approximately ~~14,466~~ 14,564 employment opportunities associated with the Project and related projects would represent 6.4 percent of the projected new jobs Citywide by 2045.

10. Chapter IV.I.2 Public Services – Police Protection

1. Pages IV.I.2-16 and IV.I.2-17, Subsection 3.d), Threshold (a)(1)(b)(i), *Project Police Service Population and Crime Rate*, revise the subsection as follows:

The Project would introduce new resident, visitor, employee and customer populations and would increase the existing number of employees at the Project Site, which would increase the demand for police protection from LAPD. As discussed in Section IV.H, *Population and Housing*, of this Draft EIR, the Project would provide ~~4,524~~ 1,589 new residential units resulting in ~~3,423~~ 3,576 residents. In addition, the project would result in approximately ~~1,975~~ 2,073 net new employees.

The increase in residential population from approximately 40,000 to ~~43,423~~ 43,576 in the LAPD Central Community Station service area would increase the resident to officer ratio from 129.8:1 to 141:1.¹¹ This is still significantly below the Citywide average of one officer per 423.7 residents. This increase in demand also does not account for benefits provided through Project security personnel and security design features. Given the one officer per 141 resident ratio with inclusion of the Project, compared to the one officer per 423 resident ratio Citywide, and the Project's security personnel and design features, it is unlikely that additional officers would be needed to serve the Project. Nonetheless, if it were determined that additional officers would be needed to maintain the existing ratio, and if hiring of officers was solely based on maintaining existing service ratios, approximately ~~26~~ 27 additional officers would be required to maintain the ratio of one officer per 129.8 residents.¹² Although the true need for additional hires would be determined by LAPD through their periodic assessment of staffing in light of multiple factors, ~~26~~ 27 additional officers would increase the existing officer total of 308 to ~~334~~ 335 total officers or an increase of approximately ~~8.4~~ 8.8 percent of officers at the Central Community Police Station.

As noted above, LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is reflected within the overall community service ratio based on the residential population as an overall police service population. Nonetheless, if the non-residential population were combined with the residential

population (police service population), the Project would generate a net total increase of ~~5,398~~ 5,648 people (residents, employees, visitors) who would require police protection services.

¹¹ ~~43,423~~ 43,576 residents ÷ 309 sworn officers = one officer per 141 residents.

¹² ~~3,423~~ 3,576 residents ÷ 129.8:1 residents/officer = ~~26~~ 27 officers

2. Page IV.I-2-18, Subsection 3.d), Threshold (a)(1)(b)(ii), *Project Police Service Impact Assessment*, revise the 2nd sentence of the 3rd full paragraph as follows:

The LAPD letter provided in Appendix ~~I-1-I-2~~ of this ~~Final Draft~~ EIR states that, currently, there are no planned improvements to the Central Community police station for the service area and that there are no special police protection requirements needed by law enforcement because of specific attributes of the Project.

3. Page IV.I.2-19, Subsection 3.e)(1), *Impact Analysis*, revise the last sentence in the 1st paragraph as follows:

The related projects, including the Project's estimated ~~3,423~~ 3,576 residents, would generate a total of ~~20,668~~ 20,820 residents.

4. Page IV.I.2-20, Subsection 3.e)(1)(b), *Operational Impacts*, revise the 1st and 2nd paragraphs as follows:

As indicated above, the residential component of the Project (~~3,423~~ 3,576 residents) plus that of the related projects (17,245 residents) would increase the service population of LAPD's Central Area by an estimated ~~20,668~~ 20,820 residents. As such, the total cumulative service population in LAPD's Central Division would be approximately ~~60,668~~ 60,820 residents, compared to the current service population of approximately 40,000 residents.

The new residents generated by the Project and related projects would result in a resident to officer ratio of approximately 197:1¹⁵ in the Central Division, compared to the current resident to officer ratio of 129.8:1.¹⁶ This increase, however, would be well below the Citywide average of 423:1 resident to officer ratio. The cumulative population increase would likewise generate an increase in the number of Citywide crimes which, at a rate of 29.9 crimes per 1,000 residents, would increase by an estimated ~~618~~ 623 crimes annually. Therefore, the Project, together with related projects would cumulatively generate increased demand for police protection services from the Central Community Station compared to existing conditions.

¹⁵ The ratio of 197:1 is derived by dividing ~~60,668~~ 60,820 residents by 308 officers (~~60,668~~ 60,820 ÷ 308 = 197)

¹⁶ See Table IV.I.2-3 in this Section.

11. Chapter IV.I.3 Public Services – Schools

- Page IV.I.3-11, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, revise the 1st two paragraphs as follows:

The Project would develop ten buildings containing ~~4,524~~ 1,589 multi-family residential units, 411,113 square feet of office floor area, and ~~413,565~~ 158,225 square feet of retail or restaurant uses, ~~and a 68-room hotel.~~

LAUSD has established student generation rates for a variety of uses including residential development (multi-family) as well as other employment generating uses (e.g., retail and office uses. Based on the LAUSD generation rates, the number of students that could be generated by the Project is illustrated in **Table IV.I.3-3, *Estimated Number of Students Generated by the Project***. As shown, the Project could generate a net increase of ~~545~~ 532 elementary school students, ~~442~~ 147 middle school students, and ~~283~~ 291 high school students for a total net increase of ~~940~~ 970 school students.

- Page IV.I.3-12, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, Table IV.I.3-3, *Estimated Number of Students Generated by the Project*, revise the table rows as follows:

**TABLE IV.I.3-3
ESTIMATED NUMBER OF STUDENTS GENERATED BY THE PROJECT**

Land Use	Use ^{a,b}	Generation Factors	Elementary School Students	Middle School Students	High School Students	Total ^c
Proposed Uses						
Residential Multi-Family	~~4,524~~ <u>1,589</u> units	Elm: 0.1953/unit MS:0.0538/unit HS: 0.1071/unit	~~297~~ <u>310</u>	~~82~~ <u>86</u>	~~463~~ <u>170</u>	~~542~~ <u>566</u>
Retail/Restaurant	~~413,565~~ <u>158,225</u> sf	0.467 students/ksf	~~29~~ <u>41</u>	~~8~~ <u>11</u>	~~46~~ <u>22</u>	~~53~~ <u>74</u>
Office	411,113 sf	0.826/ksf	187	51	102	340
~~Hotel~~	~~74,484~~ sf	~~0.195~~ /ksf	~~8~~	~~2~~	~~5~~	~~15~~
<i>Total Students Generated by Proposed Uses</i>			~~524~~ <u>538</u>	~~143~~ <u>148</u>	~~286~~ <u>294</u>	~~950~~ <u>980</u>
Existing Uses						
North Site Cold Storage/Warehouse	167,596 sf	0.010 students/ksf	2	0	1	3
South Site Office	2,871 sf	0.826/ksf	2	1	1	4
South Site Cold Storage/Warehouse	190,267 sf	0.010 students/ksf	2	0	1	3

Land Use	Use ^{a,b}	Generation Factors	Elementary School Students	Middle School Students	High School Students	Total ^c
<i>Total Students Generated by Existing Uses</i>			6	1	3	10
Net Total (Proposed Less Existing)			~~545~~ <u>532</u>	~~142~~ <u>147</u>	~~283~~ <u>291</u>	~~940~~ <u>970</u>

NOTE(S): ksf = 1,000 square feet

^a Student generation rates for residential uses are based on Table 3 of the LAUSD Developer Fee Justification Study, March 2022.

^b Student generation for the retail/ restaurant uses is based on the Neighborhood Shopping Center student generation rates; student generation for offices is based on Standard Commercial Offices; and student generation for hotel uses is based on Lodging rates as provided in Table 15 of the LAUSD 2022 Developer Fee Justification Study, March 2022. Since the Developer Fee Justification Study does not specify grade levels for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.

^c Input totals for elementary, middle and high schools have been rounded based on generation factors to equal total number of students.

SOURCE: ESA, 2022. Updated in May 2024.

3. Page IV.I.3-13, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, Table IV.I.3-4, *Existing Capacity and Enrollment of LAUSD Schools Serving the Project Site with the Project*, revise the table rows as follows:

**TABLE IV.I.3-4
EXISTING CAPACITY AND ENROLLMENT OF LAUSD SCHOOLS SERVING THE PROJECT SITE
WITH THE PROJECT**

School	Current Capacity ^a	Resident Enrollment ^a	Current Seating Overage/ (Shortage) ^a	Project-Generated Students ^b	Enrollment with Project ^c	Seating Overage/ (Shortage) With Project ^d
9th Street Elementary School (K–5)	277	242	35	~~545~~ <u>532</u>	~~757~~ <u>774</u>	~~(480)~~ <u>(497)</u>
Hollenbeck Middle School (6–8)	1,042	1350	(308)	~~142~~ <u>147</u>	~~1,492~~ <u>1,497</u>	~~(450)~~ <u>(455)</u>
Belmont Zone of Choice Schools (9–12):	6,955	6,649	306	~~283~~ <u>291</u>	~~6,932~~ <u>6,940</u>	~~25~~ <u>15</u>

NOTE(S):

^a See Table IV.I.3-2

^b See Table IV.I.3-3

^c Enrollment with Project is equal to the Resident Enrollment plus the Estimated Number of Students Generated by the Project (as stated in Table IV.I.3-2).

^d Existing seating overage (or shortage) with Project is equal to the current capacity minus the Enrollment with Project.

SOURCE: Vincent Maffei, Director, LAUSD, letter correspondence dated June 22, 2022; ESA, 2022. Updated in May 2024.

4. Page IV.I.3-13, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, revise the last sentence in the 1st paragraph as follows:

However, the Project's new students would not exceed the seating capacity at the Belmont Zone of Choice Schools, which would have ~~24~~15 remaining seats available.

5. Page IV.I.3-15, Subsection 3.e)(1), *Impact Analysis*, revise the last sentence in the 1st paragraph as follows:

As shown in Table IV.I.3-5, the Project in combination with related projects would potentially generate ~~3,329~~3,346 elementary school students, ~~915~~920 middle school students, and ~~1,823~~1,831 high school students for a total of ~~6,067~~6,097 students.

6. Page IV.I.3-15, Subsection 3.e)(1), *Impact Analysis*, Table IV.I.3-5, *Cumulative Student Generation*, revise the table rows as follows:

**TABLE IV.I.3-5
CUMULATIVE STUDENT GENERATION**

Land Use	Amount ^a	Generation Factors ^{b,c}	Elementary School Students	Middle School Students	High School Students	Total
Related Projects						
Residential	8,340 du	Elm: 0.1953/unit MS:0.0538/unit HS: 0.1071/unit	1,628	449	893	2,970
Employees ^c	12,511 employees	0.1724 student/emp	1,186	324	647	2,157
Total Students Generated by Related Projects			2,814	773	1,540	5,127
Project Students (Net)			~~515~~ <u>532</u>	~~142~~ <u>147</u>	~~283~~ <u>291</u>	~~940~~ <u>970</u>
Total Increase (Related Projects + Project)			~~3,329~~ <u>3,346</u>	~~915~~ <u>920</u>	~~1,823~~ <u>1,831</u>	~~6,067~~ <u>6,097</u>

NOTE(S):

^a Related projects residential units and employee totals from Table IV.H-5, Total Cumulative Development, in Section IV.H, *Population and Housing*, of this Draft EIR. Table IV.H-5 includes the 39 related projects identified in Chapter 3, Environmental Setting, of this Draft EIR. In addition to these 39 related projects, LAUSD's letter dated June 22, 2022 (Appendix I-3 of this Draft EIR) identified an additional mixed-use residential project located at 222 West 2nd Street consisting of 680 du and 10,000 sf of retail uses that could contribute students to schools serving the Project Site. Thus, the residential dwelling units and employee amounts shown in this Table IV.I.3-5 account for the 39 related projects in Chapter III plus those as part of the 222 West 2nd Street Project.

^b Student generation rates per household for residential uses Table 3 of the LAUSD 2022 Developer Fee Justification Study.

^c For the non-residential uses, the total number of employees from the related projects are used to calculate the number of students. Table 15 of the LAUSD 2022 Developer Fee Justification Study identifies a student per employee rate of 0.1724 for all commercial and industrial land uses. Thus, this rate was applied to the non-residential related project land uses. Since the LAUSD Developer Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school).

SOURCE: ESA, 2023. Updated in May 2024.

7. Page IV.I.3-16, Subsection 3.e)(1), *Impact Analysis*, revise the last sentence in the 1st paragraph as follows:

The Belmont Zone of Choice high schools have a seating overage of 306 seats, while the Project and related projects would generate ~~4,823~~ 1,831 students.

12. Chapter IV.I.4 Public Services – Parks and Recreation

1. Pages IV.I.4-15 and IV.I.4-16, Subsection 3.d), Threshold (a)(1)(a), *Public Recreation Plan*, revise the 1st two paragraphs as follows:

As previously discussed, the PRP recommends 2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 persons, and 6.0 acres of regional recreational sites and facilities per 1,000 residents. As discussed in Section IV.H, *Population and Housing*, of this Draft EIR, the Project's ~~4,524~~ 1,589 residential housing units would result in ~~3,423~~ 3,576 residents on the Project Site.⁵ Based on the PRP's guideline of 2.0 acres per 1,000 persons, the Project's recommended neighborhood recreational sites, as well as community recreational sites, would total ~~6.8~~ 7.15 acres.⁶

As described in detail in Chapter II, *Project Description*, of this Draft EIR, the Project would provide 90,113 sf (2.07 acres) of publicly-accessible open space, consisting of plazas and paseos passing between Central Avenue and Alameda Street and a Central Courtyard in the South Site. Overall, the Project would provide ~~463,325~~ 170,275 sf of usable open space. Of this, ~~405,248~~ 94,547 sf would be outdoor and rooftop common open space. The Project's open space would not meet the recommended 2.0 acres of neighborhood recreation sites per 1,000 persons (~~6.8~~ 7.15 acres for the Project's anticipated population increases of ~~3,422~~ 3,576 residents) and 2.0 acres of community recreational sites per 1,000 persons (~~6.8~~ 7.15 acres for a population of ~~3,422~~ 3,575 residents) in the amended PRP, based on the Project's projected residential population. However, as previously discussed, the PRP parkland guidelines are Citywide goals and do not constitute requirements for individual development projects.

⁵ The generation factors for residents of ~~3.25~~ 2.25 residents per dwelling unit is based on Table 1, Land Use and Trip Generation Base Assumptions, from the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator Documentation, Version 1.3, provided by the Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning.

⁶ ~~3,423~~ 3,576 residents/1,000 persons = ~~3.423~~ 3.575 X 1 acres = ~~3.423~~ 3.575 acres X 2 = ~~6.846~~ 7.15 acres

2. Page IV.I.4-17, Subsection 3.d), Threshold (a)(1)(b), *Los Angeles Municipal Code*, revise the 2nd and 3rd paragraphs as follows:

The Project would include development of ~~4,524~~ 1,589 residential units on the 7.6-acre (333,602 square-foot) Project Site. The Project does not propose the dedication of any portion of the Project Site to the City for parks and recreational facilities and will be required to pay in lieu fees to satisfy LAMC Section 12.33 requirements.

Private and common open space as required by the LAMC for use by the Project's residents is summarized in Table II-4, *Open Space, Trees, and Landscape Summary*, in Chapter II, *Project Description*, of this Draft EIR. As shown therein, the Project's residential uses per LAMC Section 12.21 G would require ~~463,325~~ 170,275 sf of open space (including private and common open space), which the Project provides. Of this total, the open space would include common outdoor – ~~405,218~~ 94,547 sf; recreation rooms (indoor amenity spaces) – ~~25,838~~ 25,631 sf (~~46~~ 15%),⁸ and private open space (balconies) – ~~32,269~~ 49,834 sf (~~20~~ 29%). Per LAMC Section 12.21 G, at least 50 percent of the Project's open space must be common open space. The Project's ~~405,218~~ 94,547 sf outdoor and rooftop common open space would meet this LAMC requirement. Also, at least 25 percent of this common open space must be planted with ground cover, shrubs, or trees. The Project would provide a minimum of ~~26,305~~ 23,637 sf of landscaped open space (25 percent), thus meeting the LAMC requirement. Based on above, the Project would comply with the useable open space and landscape requirements of LAMC Section 12.21 G.

3. Page IV.I.4-19, Subsection 3.d), Threshold (b)(1)(b), *Operational Impacts*, revise the 2nd and 3rd paragraphs as follows:

As previously stated under Threshold (a), based on the Project's residential population of ~~3,423~~ 3,576 residents, the Project would need to provide approximately two acres each of neighborhood and community recreational sites and facilities per 1,000 residents to meet the PRP's guidelines. As described in detail in Chapter II, *Project Description*, of this Draft EIR, the Project would provide 90,113 sf (2.07 acres) of publicly-accessible open space, consisting of plazas and paseos passing between Central Avenue and Alameda Street and a Central Courtyard in the South Site. Overall, the Project would provide ~~463,325~~ 170,275 sf of usable open space. Of this, ~~405,218~~ 94,547 sf would be outdoor and rooftop common open space. The Project's open space would not meet the recommended 2.0 acres of neighborhood recreation sites per 1,000 persons (~~6.8~~ 7.15 acres for the Project's anticipated population increases of ~~3,422~~ 3,576 residents) and 2.0 acres of community recreational sites per 1,000 persons (~~6.8~~ 7.15 acres for a population of ~~3,422~~ 3,576 residents) in the amended PRP, based on the Project's projected residential population. However, as previously discussed, the PRP parkland guidelines are Citywide goals and do not constitute requirements for individual development projects.

The Project would exceed the LAMC common open space requirement, which requires at least 50 percent of the total open space to be provided as common open space. As stated above, the Project would provide ~~405,218~~ 94,547 sf of common open space.

4. Page IV.I.4-21, Subsection 3.e)(1), *Impact Analysis*, revise the last sentence in the 2nd paragraph as follows:

The related projects, including the Project's estimated ~~3,423~~ 3,576 residents, would generate a total of ~~20,668~~ 20,820 residents.

13. Chapter IV.I.4 Public Services – Libraries

1. Page IV.I.5-9, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, revise the 1st two sentences in 1st paragraph as follows:

The Project would provide ~~1,521~~1,589 new residential units and ~~3,423~~3,576 residents, as discussed in Section IV.H, *Population and Housing*, of this Draft EIR, which would increase demand for use of libraries in the Project area. With regard to the potential for the employees of the proposed uses to utilize nearby library facilities, as discussed in Section IV.H, the Project would result in approximately ~~1,975~~2,073 net new employees.

2. Page IV.I.5-10, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, revise the 3rd sentence in 3rd full paragraph as follows:

In addition, the Project would generate revenue for the City's general fund (in the form of property taxes, sales tax, business tax, ~~transient occupancy tax~~, etc.) that could be used for the provision of public services such as library facilities.

3. Page IV.I.5-11, Subsection 3.e)(1), *Impact Analysis*, revise the last sentence in the 1st paragraph as follows:

The population increase from the Project and the related projects would generate a total of ~~20,668~~20,820 residents

4. Page IV.I.5-12, Subsection 3.e)(1), *Impact Analysis*, revise the last sentence in the 1st partial paragraph as follows:

Even if all ~~20,668~~20,820 cumulative residents were added to the Little Tokyo Branch Library service population of 45,796 persons, the service population would not exceed the LAPL's 90,000 person threshold to consider a new branch library.

5. Page IV.I.5-12, Subsection 3.e)(1), *Impact Analysis*, revise the 1st sentence in the 2nd full paragraph as follows:

Similar to the Project, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, ~~transient occupancy tax~~, etc.) that could be applied to enhancing library services in the Community Plan area, as deemed appropriate by the City.

14. Chapter IV.J Transportation

1. Page IV.J-31, Subsection 3.d), Threshold (a)(1)(a), *Mobility Plan 2035*, revise the 3rd full paragraph as follows:

The Project would provide ~~2,475~~2,444 vehicle parking spaces, ~~146~~163 short-term bicycle parking spaces, and ~~596~~629 long-term bicycle parking spaces, consistent with LAMC Sections 12.21 A.4 and 12.21 A.16(a)(2) requirements, as required by the Mobility Plan.

2. Page IV.J-32, Subsection 3.d), Threshold (a)(1)(b), *Bicycle Parking Ordinance*, revise the paragraph as follows:

LAMC Section 12.21 A.16 details the bicycle parking requirements for new developments. Based on the proposed land uses, the Project would require a total of ~~446-163~~ short-term and ~~596-629~~ long-term bicycle parking spaces. The Project's proposed ~~740-792~~ bicycle parking spaces meet the LAMC requirements for on-site bicycle parking supply. Therefore, the Project is consistent with LAMC Section 12.21 A.16.

3. Page IV.J-35, Subsection 3.d), Threshold (b)(1), *Impact Analysis*, revise the 2nd sentence in the 2nd full paragraph as follows:

As calculated by the VMT Calculator, the Project is estimated to generate a total of ~~13,724~~ 15,143 daily vehicle trips and a total daily VMT of ~~89,694~~ 99,069.

4. Page IV.J-35, Subsection 3.d), Threshold (b)(1)(a), *Residential VMT*, revise the paragraph as follows:

The VMT Calculator estimates that the Project would generate ~~13,522~~ 13,708 total daily household VMT. The daily residential VMT per capita is estimated at ~~3.9~~ 3.8 for the Project, below the threshold of 6.0 for the Central APC. Thus, the Project would have a less-than-significant impact on residential VMT per capita as estimated by the VMT Calculator.

5. Page IV.J-35, Subsection 3.d), Threshold (b)(1)(b), *Work VMT*, revise the paragraph as follows:

The VMT Calculator estimates that the Project would generate ~~13,360~~ 13,687 total daily work VMT. The daily work VMT per employee is estimated at ~~6.5~~ 6.4 for the Project, below the threshold of 7.6 for the Central APC. Thus, the Project would have a less-than-significant impact on work VMT per employee as estimated by the VMT Calculator.

6. Page IV.J-36, Subsection 3.d), Threshold (b)(1)(c), *Project Impacts*, Subsection d), *Analysis of Project Impacts*, Threshold (b), subsection (1), *Impact Analysis*, subsection (c) *Retail VMT*, revise the 1st two paragraphs and the 1st sentence of the 3rd paragraph as follows:

The Project ~~as evaluated in the TA included~~ includes ~~114,112~~ 158,225 sf of restaurant and retail uses, which ~~assumed~~ assumes ~~45,266~~ 67,595 sf of retail uses and ~~68,846~~ 90,630 sf of restaurant uses. ~~Refinements to the Project following completion of the TA have reduced the amount of restaurant space from 68,846 sf to 68,299 sf, for a reduction of 547 sf. As discussed in Chapter II, Project Description, the Project's overall square footage would be 113,565 sf. Thus, the additional 547 sf analyzed in the TA represents a conservative analysis of transportation impacts evaluated within this Transportation section. As evaluated in the TA, collectively, the~~ As stated in Chapter II, Project Description, the 158,225 sf of restaurant and retail uses includes an additional potential 12,477 square feet of outdoor

dining/patio space that may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. The Project's retail and restaurant use exceeds the 50,000 square feet threshold between local-serving and regional-serving retail identified in the TAG. Notwithstanding, the Project does not fit the TAG's definition of a regional-serving retail project and, therefore, additional VMT analysis of retail and restaurant uses beyond what is provided by the VMT Calculator is not needed. As detailed in the following discussion, the Project is not a retail project, is not considered regional-serving, and would serve the local community. Thus, the Project was not modeled as a regional-serving retail project.

The TAG's definition of a regional-serving retail project explicitly includes the term "retail project." The Project is a mixed-use development that is primarily made up of residential, ~~hotel~~ retail/restaurant, and office uses. The retail and restaurant uses comprise less than 10 percent of the total Project floor area and are not the primary Project uses. The retail and restaurant uses are intended to serve Project residents, ~~hotel guests~~ visitors, employees, transit riders, and the surrounding community.

While the total retail and restaurant components of the Project total ~~444,442~~ 158,225 sf ~~as evaluated in the TA~~, it is not anticipated that any single tenant would occupy a space larger than 50,000 sf.

15. Chapter IV.L.1 Utilities and Service Systems – Water Supply

1. Page IV.L.1-31, Subsection 3.d), Threshold (b)(1)(b), *Operation*, add a new paragraph after the last paragraph as follows:

As documented by correspondence between the City of Los Angeles Planning Department and LADWP (see Appendix G of this Final EIR), LADWP reviewed the revised development program for the Project with design modifications. Based on the modifications to the Project, LADWP calculated the Project's water demand and determined that the modified Project's net water demand would not result in a substantial increase to the previous water demand, as approved by the Board of Water and Power Commissioners on September 13, 2022 through LADWP Board Resolution No. 023 051. Thus, per California Water Code Section 10910(h), no additional water supply assessment is required for the revisions when the changes in the project do not result in a substantial increase in water demand for a project. Accordingly, for purposes of this analysis, the Project with design modifications would have the same overall water demand as shown in Table IV.L-7.

16. Chapter IV.L.2 Utilities and Service Systems – Wastewater

1. Page IV.L.2-1, Subsection 1, *Introduction*, add a sentence at the end of the 1st paragraph as follows:

This section analyzes the Project's potential impacts on wastewater collection and treatment facilities and infrastructure, including whether such existing infrastructure has sufficient capacity to serve the Project. This analysis utilizes a *Fourth & Central Utility Infrastructure Technical Report: Water, Wastewater, and Energy* (Infrastructure Report), prepared for the Project by KPFF Consulting Engineers, dated May 2023, which is included in Appendix L-1 of this Draft EIR. See Appendix G of the Final EIR for wastewater information associated with the Project design modifications.

2. Page IV.L.2-9, Subsection 3.b), *Methodology*, add a sentence following the 2nd sentence of the 1st paragraph as follows:

The analysis of Project impacts on wastewater infrastructure and treatment capacity is based on the Infrastructure Report included as Appendix L-1 of this Draft EIR. The Infrastructure report includes the results of a SCAR included in Appendix L-1 as Exhibit 5. See Appendix G of this Final EIR for wastewater information associated with the Project design modifications, including an updated SCAR.

3. Page IV.L.2-9, Subsection 3.c), *Project Design Features*, revise the 2nd sentence of the 1st paragraph as follows:

The Project would include water conservation features, which would also result in a reduction in wastewater generation. Such conservation features are included in Project Design Feature PDF-WS-1, included in Section IV.L.1, *Utilities and Service Systems – Water Supply and Infrastructure*, of this Draft EIR.

4. Page IV.L.2-10, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, revise the 1st sentence of the 1st paragraph as follows:

Table IV.L.2-1, Wastewater Generation during Project Operation, shows that the Project would result in an estimated average gross wastewater generation of approximately ~~588,278~~ 620,709 gpd.

5. Page IV.L.2-11, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, revise Table IV.L.2-1, *Wastewater Generation During Project Operation*, as follows:

**TABLE IV.L.2-1
WASTEWATER GENERATION DURING PROJECT OPERATION**

Land Use	Average Daily Flow (gpd) ^a	Unit	Quantity	Average Daily Wastewater (gpd) ^b
Office Bldg. w/Cooling Tower	170	KGSF	403,715 <u>411,113</u>	68,632 <u>69,889</u>
Residential: Apt - Bachelor	75	DU	436 <u>457</u>	32,700 <u>34,275</u>
Residential: Apt - 1 BDR	110	DU	720 <u>791</u>	79,200 <u>87,010</u>
Residential: Apt - 2 BDR	150	DU	323 <u>284</u>	48,450 <u>42,600</u>
Residential: Apt - 3 BDR	190	DU	42 <u>57</u>	7,980 <u>10,830</u>
Restaurant: Full Service Indoor Seat	30	Seat	3,722 <u>5,210</u>	111,660 <u>156,300</u>
Restaurant: Full Service Outdoor Seat	30	Seat	833	24,990
Gymnasium: Basketball, Volleyball	200	KGSF	11,000 <u>6,000</u>	2,200 <u>1,200</u>
~~Hotel: Use Guest Rooms Only~~	420	~~Room~~	68	8,160
~~Bar: Cocktail, Fixed Set~~	45	~~Seat~~	37	555
Retail Area (less than 100,000 SF)	~~50-25~~	KGSF	45,266 <u>67,596</u>	1,132 <u>1,690</u>
Health Club/Spa	650	KGSF	8,000 <u>6,000</u>	5,200 <u>3,900</u>
Lobby ~~Retail Area~~	50	KGSF	16,232 <u>14,009</u>	812 <u>700</u>
Car Wash: Hand Wash	~~100-~~	Actual	42 <u>420</u>	4,200 <u>420</u>
~~Bike Parking / Repair - Auto Parking~~	20	KGSF	1,200	24
Conference Room ~~of Office Bldg. Area~~	~~120-~~	KGSF	41,360 <u>600</u>	4,963 <u>600</u>
Pet Grooming (Barber Shop)	120	KGSF	~~3,500~~ <u>3,000</u>	420 <u>360</u>
Lounge	50	KGSF	98,484 <u>77,352</u>	4,924 <u>3,868</u>
Pool	-	Total	182,077	182,077
Proposed Project Total Flow			588,278	<u>620,709</u>
Existing Flow				11,081
Project Net Total Flow			577,197	<u>609,628</u>

^a The average daily flow based on LASAN sewerage generation factors.

^b Average daily water demand = Average daily flow x Quantity

SOURCE: KPFF Consulting Engineers, Infrastructure Report, Table 2, February 2023. Updated in May 2024. See SCAR dated May 20, 2024 in Appendix G of this Final EIR.

6. Page IV.L.2-12, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, revise the 1st and 2nd paragraphs as follows:

A SCAR was submitted to LASAN to determine whether the existing public infrastructure can accommodate the Project. See Appendix G of this Final EIR for SCAR associated with the Project design modifications. The SCAR submitted shows an average wastewater flow of up to ~~588,278~~ 620,709 gpd of which ~~65-67~~ percent would discharge to Central Avenue (~~382,381~~ 415,875 gpd) and ~~35-33~~ percent would discharge to Alameda Street (~~205,897~~ 204,834 gpd).

The existing capacity of the 10-inch VCP sewer main in Central Avenue is 1.44 cfs, and up to ~~382,381~~ 415,875 gpd can enter the main per the SCAR, this is roughly ~~41.1~~ 53.7 percent of the capacity of the sewer main in Central Avenue that the Project can discharge. The closest 20-inch VCP sewer main in Alameda Street flows south and have a calculated capacity of 7.53 cfs, and up to ~~205,897~~ 204,834 gpd can enter the main per the SCAR, this is roughly ~~4.23~~ 5.05 percent of the capacity of the main that is allowed to be discharged. Therefore, the sewer main lines serving the Project have adequate capacity to accommodate the Project.

7. Page IV.L.2-12, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, revise the 5th paragraph as follows:

Ultimately, this sewage flow would be conveyed to the HWRP, which has sufficient capacity for the Project. As discussed in further detail under Threshold (b), below, the Project's conservative net daily increase in wastewater ~~0.577~~ 0.61 net mgd (~~0.588~~ 0.621 mgd Project – 0.011 mgd Existing) would represent ~~0.33~~ 0.35 percent of the current estimated 175 mgd of remaining available capacity at the HWRP. In addition, with regard to future flows, the Project's ~~0.577~~ 0.61 net mgd plus the projected 2030 flows of 275 mgd to the HWRP would represent 61.2 percent of the HWRP's assumed future capacity of 450 mgd. The calculations provided under Threshold (b) demonstrate that HWRP would have available capacity to treat the Project's wastewater generation.

8. Page IV.L.2-13, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, revise the 1st paragraph as follows:

As provided in Table IV.L.2-1, the Project would generate a wastewater flow from the Project Site of ~~588,278~~ 620,709 gpd or of ~~0.588~~ 0.621 mgd, or a net increase of ~~0.577~~ 0.61 net mgd (~~0.588~~ 0.621 mgd Project – 0.011 mgd Existing) when subtracting for existing on-site uses.

9. Page IV.L.2-14, Subsection 3.d), Threshold (a)(1)(b), *Operational Impacts*, revise the 1st full paragraph on the page as follows:

Based on LASAN's average flow projections for the HWRP, it is anticipated that average flows in 2030, the Project build-out year, would be 275 mgd. Accordingly, the future remaining available capacity in 2030 would be approximately 175 mgd. The Project's net increase in average daily wastewater flow of ~~0.577~~ 0.61 mgd would represent ~~0.33~~ 0.35 percent of the estimated future 2030 remaining available capacity of 175 mgd at the HWRP. In addition, with regard to future flows, the Project's ~~0.577~~ 0.61 net mgd plus the projected 2030 flows of 275 mgd to the HWRP would represent 61.2 percent of the HWRP's assumed future capacity of 450 mgd. Therefore, wastewater generated by the Project, during operation, would be accommodated by the future 2030 capacity of the HWRP.

10. Page IV.L.2-15, Subsection 3.e)(1)(b), *Wastewater Treatment Capacity*, revise the 3rd sentence in the 1st paragraph as follows:

As shown in **Table IV.L.2-2, Operational Cumulative Wastewater Generation**, the estimated cumulative wastewater generation for the Project plus the related projects is approximately ~~2,936,906~~ 2,969,337 gpd (~~2.94~~ 2.97 mgd).

11. Page IV.L.2-16, Subsection 3.e)(1)(b), *Wastewater Treatment Capacity*, revise the summary rows in Table IV.L.2-2, *Operational Cumulative Wastewater Generation*, as follows:

**TABLE IV.L.2-2
OPERATIONAL CUMULATIVE WASTEWATER GENERATION**

Land Use	Quantity	Generation Rate (gpd/unit)^a	Total Wastewater Generation (gpd)
Residential ^b	7,660 du	150/du	1,149,000
Office ^c	2,198,635 sf	170/ksf	373,768
Retail (Less than 100 ksf)	344,080 sf	50/ksf	17,204
Restaurant ^d	284,314 sf (18,954 seats)	30/seat	568,620
Hotel	972 rooms	120/room	116,640
School ^e	300 students	9/student	2,700
Commercial	329,253 sf	50/ksf	16,463
Museum	52,204 sf	30/ksf	1,566
Warehouse	316,632 sf	30/ksf	9,499
Event Space ^f	160,724 sf (17,858 seats)	3/seat	53,574
Storage	63,785 sf	30/ksf	1,913
Amenity Space ^g	10,085 sf	50/ksf	1,100
Institutional ^h	10,763 sf	350/ksf	3,767
Health Club/Gym	67,531 sf	650/ksf	43,895
Total Wastewater Generation by Related Projects			2,359,709
Project Net Operational Wastewater Generation Increase			~~577,197~~ <u>609,628</u>ⁱ
Cumulative Wastewater Generation with Project			<u>2,936,906</u> <u>2,969,337</u>^j

**TABLE IV.L.2-2
OPERATIONAL CUMULATIVE WASTEWATER GENERATION**

Land Use	Quantity	Generation Rate (gpd/unit) ^a	Total Wastewater Generation (gpd)
NOTE(S):			
du = dwelling unit; ksf = thousand square feet; gpd = gallons per day			
^a Wastewater generation factors are based on LASAN Sewage Generation Factors for Residential and Commercial Categories, dated April 6, 2012.			
^b Rates for residential wastewater generation vary depending on unit type and size. It was assumed that all residential projects would have an average size of two bedrooms.			
^c Office conservatively applies the Office Building with Cooling Tower sewage generation factor.			
^d Restaurant conservative uses Restaurant: Full Service Outdoor/Indoor Seat sewage generation factor. It is assumed that each seat will require approximately 15 square feet.			
^e Elementary/Jr. High School sewage generation factor used as no school type has been determined.			
^f Event Space uses the Auditorium sewage generation factor and includes event space and arts/production space. It is assumed that each seat requires approximately nine square feet.			
^g Amenity Space includes amenity and productions spaces, and is based on Gymnasium sewage generation rate.			
^h Sewage generation rates provided LASAN do not include rates for Institution uses. Therefore, the land use rate of 350 gallons/1,000 square feet of "Banquet Room" is applied.			
ⁱ Project Net Operational Wastewater Generation is from Table IV.L.2-1.			
^j Totals may not add up due to rounding.			
SOURCE: ESA, 2023. <u>Updated in May 2024. See SCAR dated May 20, 2024 in Appendix G of this Final EIR.</u>			

12. Page IV.L.2-17, Subsection 3.e)(1)(b), *Wastewater Treatment Capacity*, revise 1st paragraph as follows:

Based on LASAN's Average flow projections for the HWRP, it is anticipated that the average flow in 2030 would be approximately 275 mgd.²² Accordingly, the future remaining available capacity in 2030 would be approximately 175 mgd. The Project's net increase plus the related projects average daily wastewater flow of ~~2.94~~2.97 mgd would represent ~~1.68~~1.69 percent of the estimated future 2030 remaining available capacity of 175 mgd at the HWRP. In addition, with regard to future flows, the Project and related projects combined sewage generation of ~~2.94~~2.97 mgd plus the projected 2030 flows of 275 mgd to the HWRP would represent 61.8 percent of the HWRP's assumed future capacity of 450 mgd. Therefore, wastewater generated by the Project and related projects, during operation, would be accommodated by the future 2030 capacity of the HWRP. **Therefore, Project impacts on wastewater treatment systems would not be cumulatively considerable, and cumulative impacts would be less than significant.**

17. Chapter IV.L.3 Utilities and Service Systems – Solid Waste

- Pages IV.L.3-15 and IV.L.3-16, Subsection 3.d), Threshold (a)(1)(b), *Operation*, revise the 1st paragraph and Table IV.L.3-2, *Estimated Operational Solid Waste Generation*, as follows:

Estimated solid waste generation for Project operation is shown in **Table IV.L.3-3, *Estimated Operational Solid Waste Generation***. As indicated therein, it is estimated that the Project would generate a net increase over and above existing conditions of approximately ~~5,083~~ 5,338 tons of solid waste per year. This estimate does not take into account the amount of solid waste that would be diverted via source reduction and recycling programs within the City. Countywide, the ColWMP assumes an ongoing diversion rate of 65 percent.⁴² Therefore, assuming a diversion rate of 65 percent, Project operation would generate a net increase of ~~4,779~~ 1,868 tons of solid waste requiring landfill disposal per year. It is also acknowledged that Project would provide on-site recycling collection facilities for the Project's occupants within the same area as the other "back-of-house" services for the Project Site.

**TABLE IV.L.3-3
ESTIMATED OPERATIONAL SOLID WASTE GENERATION**

Land Use	Quantity ^a	Daily Generation Factor ^b	Solid Waste Generation (tons/year) ^c	Solid Waste Generation (lbs/day) ^c
Proposed New Uses				
Residential	~~4,524~~ <u>1,589</u> units	0.87 tons/unit/year	~~4,323~~ <u>1,382</u>	~~7,249~~ <u>7,573</u>
General Retail	~~45,266~~ <u>67,595</u> sf (94 <u>135</u> emp) ^d	1.96 tons/emp/year	~~478~~ <u>265</u>	~~975~~ <u>1,450</u>
Restaurant (High Turnover and Quality Restaurant)	~~68,299~~ <u>90,630</u> sf (275 <u>363</u> emp) ^e	1.92 tons/emp/year	~~528~~ <u>697</u>	~~2,893~~ <u>3,819</u>
General Office	411,113 sf (1,644 emp) ^f	2.02 tons/emp/year	3,321	18,197
Hotel	~~68~~ rooms (34 emp) ^g	1.76 tons/emp/year	60	329
Proposed Subtotal^e	—	—	~~5,410~~ <u>5,665</u>	~~29,643~~ <u>31,039</u>
<i>Existing Uses^h</i>	360,734 sf (69 emp)		(327)	(1,793)
Net Increase (pre-diversion)	—	—	~~5,083~~ <u>5,338</u>	~~27,850~~ <u>29,246</u>
Net Increase (post-diversion)ⁱ	—	—	~~4,779~~ <u>1,868</u>	~~9,748~~ <u>10,236</u>

**TABLE IV.L.3-3
ESTIMATED OPERATIONAL SOLID WASTE GENERATION**

Land Use	Quantity^a	Daily Generation Factor^b	Solid Waste Generation (tons/year)^c	Solid Waste Generation (lbs/day)^c
-----------------	-----------------------------	--	---	---

NOTE(S):

lb = pounds; sf = square feet; emp = employees

^a Number of employees are based on employee generation factors in the City of Los Angeles VMT Calculator Documentation, Version 1.3, Table 1, Land Use and Trip Generation Base Assumptions, May 2020.

^b Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgroup rates>. Accessed February 24, 2022.

^c Totals may not add up due to rounding.

^d Per the VMT Calculator, General Retail use generates 2 employees/1,000 sf.

^e Per the VMT Calculator Documentation, High Turnover and Quality Restaurants uses generate 4 employees/1,000 sf.

^f Per the VMT Calculator Documentation, General Office use generates 4 employees/1,000 sf.

^g ~~Per the VMT Calculator Documentation, Hotel use generates 0.5 employees/room.~~

^h Existing subtotal is taken from Table IV.L.3-1. The amount here is based on the post-diversion existing operational generation as using a lower number for the existing uses would result in a higher net increase for the Project.

ⁱ Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the ColWMP 2020 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the state's recycling goal of 75 percent.

SOURCE: ESA, 2023. Updated in May 2024.

2. Page IV.L.3-17, Subsection 3.d), Threshold (a)(1)(b), *Operation*, revise the 1st sentence of the 1st paragraph as follows:

The Project's estimated annual pre-diversion solid waste generation of ~~5,083~~ 5,338 tons requiring landfill disposal represents approximately 0.05 percent of the County's 2020 annual waste generation of 11,401,870 tons per year and approximately 0.004 percent of the remaining 142.67-million-ton capacity in 2020 in the County's Class III landfills.

3. Page IV.L.3-17, Subsection 3.d), Threshold (a)(1)(b), *Operation*, revise the 3rd sentence of the 3rd paragraph as follows:

If all of the Project's Class III solid waste were taken to Sunshine Canyon Landfill, the Project's net addition of ~~46.3~~ 17.1 tpd⁴⁴ would represent 0.4 percent of Sunshine Canyon's remaining daily permitted capacity, assuming no diversion.

⁴⁴ The Project's daily disposal in tons assumes that landfills operate six days per week. 52 weeks * 6 days = 312 days. Therefore, the Project's daily disposal is calculated by ~~5,083~~ 5,338 net tons / 312 days = ~~46.3~~ 17.1 net tons per day.

4. Page IV.L.3-21, Subsection 3.e)(1)(b), *Operation*, revise the 2nd sentence of the 1st paragraph as follows:

The cumulative yearly disposal for the related projects with the Project (pre-diversion) would be ~~36,294~~ 36,549 tons per year or ~~498,866~~ 200,262 pounds per day.

5. Page IV.L.3-22, Subsection 3.e)(1)(b), *Operation*, revise the summary rows in Table IV.L.3-4, Estimated Cumulative Operational Solid Waste Generation, as follows:

**TABLE IV.L.3-4
ESTIMATED CUMULATIVE OPERATIONAL SOLID WASTE GENERATION**

Land Use	Quantity ^a	Daily Generation Factor ^b	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Residential	7,660 units	0.87 tons/du/year	6,664	36,516
Commercial ^c	1,025,632 sf (2,749 emp)	1.96 tons/emp/year	5,388	29,523
Hotel	972 rooms (486 emp)	1.76 tons/emp/year	856	4,686
Office	198,635 sf (8,861 emp)	2.02 tons/emp/year	17,899	98,078
Schools ^d	300 students (45 emp)	0.45 tons/emp/year	20	111
Other Services ^e	613,739 sf (352 emp)	1.09 tons/emp/year	385	2,102
Cumulative Subtotal (without Project)^f			31,211	171,016
<i>Project (net increase pre-diversion)^g</i>			~~5,083~~ <u>5,338</u>	~~27,850~~ <u>29,246</u>
Cumulative Total (with Project) Pre-Diversion			~~36,294~~ <u>36,549</u>	~~198,866~~ <u>200,262</u>
Cumulative Total (with Project) Post-Diversion (65% Diversion)			~~12,703~~ <u>12,792</u>	~~69,603~~ <u>70,092</u>

NOTE(S):

lb = pounds; sf = square feet; sf = square feet; emp = employees

^a Number of employees per use are based on land use and employment data in Appendix H-1, *Population, Housing and Employment Data Worksheets*, of this Draft EIR.

^b Generation factors provided by are CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgroup rates>. Accessed February 24, 2022.

^c Commercial uses include retail, restaurant and associated storage, patio and mezzanine areas, supermarket/grocery, and supporting commercial spaces.

^d Schools include daycares, universities, and art school uses.

^e "Other Services" includes various uses that do not have specific generation rates, such as arts/production space, event space, museum, warehouse, production space, open space/recreation, institutional, amenity space, gym, and health club.

^f Totals may not add up precisely due to rounding.

^g Project amount is taken from Table IV.L.3-3 of this section.

SOURCE: ESA, 2023. Updated in May 2024.

6. Pages IV.L.3-22 and IV.L.3-23, Subsection 3.e)(1)(b), *Operation*, revise the paragraph that continues onto page IV.L.3-23 as follows:

As the County's Class III landfills serve the entire County of Los Angeles, the Project plus the 39 related projects would represent only a small portion of the overall regional service

area. The solid waste generation by the Project and related projects would also represent only a fraction of the available capacity that could be accommodated at the landfills serving them. The approximately ~~36,294~~ 36,549 tons of solid waste per year estimated to be generated by the Project and 39 related projects (pre-diversion) would account for approximately 0.32 percent of the County's expected total annual solid waste generation of 11,401,870 tons per year through 2035. Assuming a diversion rate of 65 percent, the Project and 39 related projects would generate approximately ~~42,703~~ 12,792 tons per year⁴⁹ requiring disposal, which would account for approximately 0.11 percent of the County's expected total annual solid waste generation and 0.009 percent of remaining 142.67-million-ton annual capacity in the County's Class III landfills.

⁴⁹ ~~36,294~~ 36,549 X 0.35 = ~~42,703~~ 12,792

7. Page IV.L.3-23, Subsection 3.e)(1)(b), *Operation*, revise the 3rd sentence of the 2nd full paragraph as follows:

If all of the Project's and related project's Class III solid waste were taken to Sunshine Canyon Landfill, the Project's and related project's net addition of ~~416.3~~ 117.1⁵¹ tpd would represent ~~2.7–2.8~~ percent of Sunshine Canyon's remaining daily permitted capacity, assuming no diversion. With diversion at the County's 65 percent rate, this percentage would drop to approximately 1.0 percent.⁵²

⁵¹ The Project's daily disposal in tons assumes that landfills operate six days per week. 52 weeks * 6 days = 312 days. Therefore, the Project's and related project's daily disposal is calculated by ~~36,294~~ 36,549 net tons / 312 days = ~~416.3~~ 117.1 net tons per day.

⁵² The Project's daily disposal in tons assumes that landfills operate six days per week. 52 weeks * 6 days = 312 days. Therefore, the Project's and related project's daily disposal is calculated by ~~42,703~~ 12,792 net tons / 312 days = ~~40.7~~ 41 net tons per day.

18. Chapter IV.L.4 Utilities and Service Systems – Electric Power and Natural Gas Infrastructure

1. Page IV-L.4-6, Subsection 3.b), *Methodology*, revise 2nd sentence of the paragraph as follows:

Project energy usage, including electricity and natural gas, was calculated using CalEEMod Version 2020.4.0-2022.1 (refer to Section IV.C, *Energy*, of this Draft EIR). See Appendix D of the Final EIR for energy calculations associated with the Project with design modifications.

2. Page IV-L.4-8, Subsection 3.d), Threshold (a)(1)(a)(ii), *Operation*, revise the 1st paragraph as follows:

As discussed in reported in ~~Table IV.C-2~~ Table IV.C-4, *Summary of Annual Net New Energy Use During Project Operation – Project*, in Section IV.C, *Energy*, of this Draft EIR, the Project's annual net increase in operational electricity usage would be approximately

~~21,239,533~~ 19,700,131 kWh for the Project. The Project-related increase in annual electricity consumption would represent ~~0.08~~ 0.07 percent of LADWP's projected sales in 2030 and would be within LADWP's projected electricity supplies. During peak conditions, the Project would represent approximately ~~0.08~~ 0.07 percent of the LADWP estimated peak load.

3. Pages IV-L.4-9 to IV-L.4-10, Subsection 3.d), Threshold (a)(1)(b)(ii), *Operation*, revise the 3rd and 4th sentences as follows:

The Project would result in a net reduction in natural gas demand of approximately ~~4,506,825~~ 4,211,027 cubic feet inclusive of Project operation activities related to transportation sources (i.e., natural gas-fueled vehicles). The Project's transportation sources of natural gas demand, estimated from EMFAC2021, would be approximately ~~2,830,007~~ 3,125,805 cf (i.e., natural gas-fueled vehicles), which represents approximately ~~0.0003~~ 0.0004 percent of the 2030 forecasted consumption in the SoCalGas planning area.

19. Chapter V Alternatives

1. Page V-2, Subsection 2, *Objectives of the Project*, revise 1st sentence of the 2nd paragraph as follows:

The underlying purpose of the Project is to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, office, retail, ~~hotel~~ and restaurant uses, as well as publicly-accessible open spaces, that would revitalize the Project Site and the surrounding neighborhood, promote walkability and use of public transit, and enhance the City's economic base. The Project's specific Project Objectives are as follows:

2. Page V-2, Subsection 2, *Objectives of the Project*, revise Objective 1 after the 2nd paragraph as follows:

Objective 1: Provide a mixed-use development that introduces an array of new residential, office, ~~hotel~~, and commercial opportunities to the Central City neighborhood.

3. Pages V-3 and V-4, Subsection 3, *Overview of Selected Alternatives*, revise the 1st paragraph that continues onto page V-4 as follows:

As presented in Chapter II, *Project Description*, of this Draft EIR, the Project would include a mix of residential, office, and restaurant/retail, ~~and hotel~~ uses within 10 distinct buildings over the three Sites. The buildings would have a total floor area of 2,318,534 sf, and a floor area ratio (FAR) of 7.13:1. The Project would include: ~~4,521~~ 1,589 residential units, including affordable housing units, totaling ~~1,731,849~~ 1,761,673 sf. Non-residential uses include 411,113 sf of office uses, ~~401,088~~ 145,748 sf⁴ of restaurant/retail uses, ~~and 68 hotel rooms (74,484 sf of hotel floor area)~~. The Project would provide ~~163,325~~ 170,275 sf of

LAMC code-required usable open space for residential uses, which would consist of ~~105,218~~ 94,547 sf of common outdoor space, ~~25,838~~ 25,631 sf of recreational/indoor amenity space, and ~~32,269~~ 49,834 sf of private open space in the form of balconies. Additionally, the Project would provide 90,113 sf of publicly-accessible open space throughout the Project Site. The publicly-accessible open space would include paseos connecting Central Avenue and Alameda Street, plazas, and pocket parks on the North and South Sites. The proposed buildings would range in height from 2 to ~~44~~ 30 stories, with a maximum height for the ~~44~~ 30-story building of ~~497~~ 364 feet. The Project would provide ~~2,475~~ 2,444 vehicle parking spaces within subterranean parking (up to 4 levels) and 6 levels of podium parking in Building 2 and 4 levels of podium parking in Building 9. The Project would also provide a total of ~~146~~ 263 short-term bicycle parking spaces and ~~596~~ 629 long-term bicycle parking spaces.

⁴ The ~~101,088~~ 145,748 square feet of restaurant/retail floor area includes floor area for purposes of calculating floor area per LAMC requirements. An additional potential 12,477 square feet of outdoor dining/patio space may be incorporated into the Project, which does not count towards the LAMC calculation of floor area. To provide a conservative analysis of environmental impacts associated with the Projects retail/restaurant uses, the environmental analyses included in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR, evaluates a total of ~~113,565~~ 158,225 square feet of restaurant/retail uses. It is assumed there would be ~~45,266~~ 67,595 square feet of retail uses and ~~68,299~~ 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

4. Page V-5, Subsection 3, *Overview of Selected Alternatives*, revise the 1st full bulleted paragraph on the page as follows:

- **Alternative 2 – Above Grade Parking Alternative:** The purpose of Alternative 2 is to reduce the Project's excavation volumes and, thus, reduce the Project's significant and unavoidable construction-related air quality and noise impacts associated with excavation, grading, and hauling. As with the Project, Alternative 2 would remove all the existing buildings and associated surface parking from the Project Site. However, as with the Project, a portion of the Los Angeles Cold Storage Building on the North Site would be retained, if feasible. Alternative 2 would eliminate the Project's subterranean parking garages; reduce the Project's ~~2,475~~ 2,444 parking spaces to 990 spaces, a reduction of 60 percent; and locate all parking in above-grade, enclosed parking podiums within the building footprints. Excavation would be reduced from 651,000 cubic yards (CY) to 36,286 CY, an approximate 94 percent reduction. Alternative 2 would provide the same number of buildings and LAMC calculated floor area (2,318,534 sf) as the Project. ~~However, the The Project's hotel would be removed from the scope of the Project and the Project's residential uses would be increased from 1,521 units to remain at 1,589 units.~~ With the inclusion of parking podiums in the lower stories, the heights of some of the buildings would be greater than under the Project. The configuration of the buildings, including the size of the building footprints and the relative location of the buildings within the Project Site, would be similar to the Project. As with the Project, Alternative 2 would provide ~~113,565~~ 158,225 sf of retail and restaurant uses (indoor and outdoor spaces) and 90,113 sf of landscaped and publicly-accessible open space and paseos at ground level.

5. Page V-5, Subsection 3, *Overview of Selected Alternatives*, revise the 2nd bulleted paragraph (Alternative 3) on the page as follows:

- **Alternative 3 – Historic Preservation/Reduced Density Alternative:** Alternative 3 would preserve the North Site in its existing condition and industrial function by eliminating the North Site component from the scope of the Project. Alternative 3 was selected to eliminate the significant and unavoidable historical resources impact on the historic, six-story Los Angeles Cold Storage (LACS) Building on the North Site. Alternative 3 would also reduce the scale of the Project's construction activities and, thus, reduce the Project's respective significant and unavoidable construction emissions, noise, and vibration impacts. The South Site would be developed with 1,559,533 sf of building floor area and the West Site would be developed with 63,422 sf of building floor area for a total of 1,622,975 sf. ~~Similar to Alternative 2, the Project's hotel would be removed under Alternative 3.~~ Alternative 3 represents a 30 percent reduction in the Project's 2,318,534 sf of new building floor area and would reduce the Project's FAR from 7.13:1 to 5.90:1. Alternative 3 would retain the Project's open space and paseos on the South Site. Parking would be reduced from the Project's ~~2,475~~ 2,444 spaces to 990 spaces, a 60 percent reduction compared to the Project. Alternative 3 would reduce the Project's grading, excavation, and soils export from 651,000 CY to 321,365 CY, a reduction of approximately 51 percent.

6. Page V-6, Subsection 3, *Overview of Selected Alternatives*, revise the 4th sentence in the bulleted paragraph (Alternative 4) as follows:

Parking would be reduced from ~~2,475~~ 2,444 spaces to 928 spaces, a ~~62.5~~ percent reduction compared to the Project.

7. Page V-7, Subsection 4, *Alternatives Considered and Rejected*, revise Table V-1 as follows:

**TABLE V-1
OVERVIEW OF THE ANALYZED ALTERNATIVES**

Component	Project	Alternative 1: No Project/No Build	Alternative 2:	Alternative 3:	Alternative 4:
Industrial Floor Area	0 sf	360,734 sf	0 sf	167,596 sf (existing to remain on North Site)	167,596 sf (existing to remain on North Site)
Total Residential Units	~~1,521~~ <u>1,589</u> units	0 units	1,589 units	1,049 units	0 units
Affordable Housing Units (part of total)	144 units	0 units	144 units	0 units	0 units
Office Floor Area	411,113 sf	0 sf	411,113 sf	282,005 sf	1,159,267 sf
~~Hotel Rooms~~	~~68 rooms~~	~~0 rooms~~	~~0 rooms~~	~~0 rooms~~	~~0 rooms~~
Retail/Restaurant Floor Area	~~401,088~~ <u>145,748</u> sf (indoor) + 12,477 (outdoor) = ~~413,565~~ <u>158,225</u>	0 sf	~~401,088~~ <u>145,748</u> sf (indoor) + 12,477 (outdoor) = ~~413,565~~ <u>158,225</u>	74,993 sf (indoor) + 9,174 sf (outdoor) = 84,167 sf	0 sf
Total New Construction Floor Area (excludes outdoor area)	2,318,534 sf	0 sf	2,318,534 sf	1,613,801 sf	1,159,267 sf
Total Floor Area	2,318,534 sf	0 sf	2,318,534 sf	1,781,397 sf	1,326,863 sf
Floor Area Ratio (FAR)	7.13:1	1.09:1	7.13:1	5.34:1	3.98:1
Publicly-accessible Open Space	90,113 sf	0	90,113 sf	81,146 sf	0
Subterranean, Surface, and/or Podium Parking	~~2,475~~ <u>2,444</u> spaces	72 spaces plus 67 loading docks (existing)	990 spaces (Podium Only)	990 spaces (subterranean and surface)	928 spaces (parking structure only)
Excavated Materials for Export	651,000 CY	0 CY	36,286 CY	321,364 CY	40,532 CY

CY = cubic yards

SOURCE: ESA, 2023. Updated in May 2024.

8. Page V-8, Subsection 4, *Alternatives Considered and Rejected*, revise the 1st sentence in the 1st paragraph (Air Emissions) as follows:

Construction of the Project would result in significant and unavoidable impacts related to NO_x and CO emissions during ~~construction of foundations and overlapping construction activities for other on-site buildings.~~

9. Page V-8, Subsection 4, *Alternatives Considered and Rejected*, revise the 4th sentence in the 2nd paragraph (Noise) as follows:

It is not feasible to install noise barriers with height sufficient to block the line-of-sight for all noise-sensitive receptors located on the upper levels of a mid-rise or high-rise residential ~~or hotel~~ building due to barrier foundation and wind load restrictions.

10. Page V-9, Subsection 4, *Alternatives Considered and Rejected*, revise the 1st sentence in the 2nd full paragraph as follows:

DTLA 2040 Compliant Alternative. The same amount of retail, office and ~~hotel~~ commercial uses could be developed under an Alternative consistent with the specific policies of the approved but not-currently adopted Downtown Los Angeles Community Plan (DTLA 2040) as under the Project.

11. Page V-13, Subsection 6.a)(2)(a)(ii)(b), Operation, delete the 3rd sentence in the paragraph as follows:

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. As such, Alternative 1 would have no new impact regarding a cumulatively considerable increase in criteria pollutants. ~~Operation of the Project would result in an interim Co significant and unavoidable impact during concurrent construction activities and interim operations.~~

12. Page V-22, Subsection 6.a)(3), *Relationship of the Alternative to Project Objectives*, revise Objective 1 as follows:

Objective 1: Provide a mixed-use development that introduces an array of new residential, office, ~~hotel~~, and commercial opportunities to the Central City neighborhood.

13. Page V-23, Subsection 6.b)(1), *Description of the Alternative*, revise the 2nd sentence of the 2nd paragraph as follows:

Consistent with the provisions of AB 2097, Alternative 2 would include 990 parking spaces which is a reduction of 60 percent from the Project's ~~2,475~~ 2,444 spaces.

14. Page V-23, Subsection 6.b)(1), *Description of the Alternative*, revise the 3rd paragraph as follows:

Table V-2, Alternative 2 and Uses Compared to the Project, illustrates the changes in Alternative 2 compared to the Project. As shown in Table V-2, Alternative 2 would ~~remove the hotel from the scope of the development and ascribe the additional space floor area to residential uses, thus, increasing have residential units from 1,521 units to 1,589 residential units similar to the Project.~~ Restaurant/retail floor area and office floor area would remain the same as under the Project. Ground level retail uses would be located in level one of the parking podiums. The overall floor area (2,318,534 sf) and FAR (7.13:1) would be the same as under the Project.

15. Page V-24, Subsection 6.b)(1), *Description of the Alternative*, revise Table V-2 as follows:

**TABLE V-2
ALTERNATIVE 2 USES COMPARED TO THE PROJECT**

Uses/Features	Project	Alternative 2
Residential Units:	~~1,521~~ <u>1,589</u> units	1,589 units
Office Floor Area:	411,113 sf	411,113 sf
Restaurant/Retail Floor Area:	~~401,088~~ <u>145,748</u> sf	~~401,088~~ <u>145,748</u> sf
Hotel Rooms:	~~68~~ rooms	0 rooms (No Hotel)
Parking Spaces:	~~2,475~~ <u>2,444</u> spaces	990 spaces
Public Use Open Space	90,113 sf	90,113 sf
Total Floor Area:	2,318,534 sf	2,318,534 sf
Floor Area Ratio:	7.13:1	7.13:1
Total Excavated Soil for Export:	651,000 CY	36,286 CY

SOURCE: Studio One Eleven, 2023. Updated in May 2024.

16. Page V-27, Subsection 6.b)(2)(a)(ii)(b), *Operation*, revise the last two sentences of the 1st partial paragraph and the 1st full paragraph as follows:

Thus, under both the Project and Alternative 2, NO_x and CO would be reduced to below the SCAQMD regional significance threshold from construction activities that would overlap with the interim operations. ~~However, CO emissions from construction activities that would overlap with the interim operations during the Project or Alternative 2 would exceed the SCAQMD regional significance threshold with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2 and impacts would be significant and unavoidable.~~

With the substantial reduction in grading activities and the reduced on-site parking and VMT under Alternative 2, the duration of overlapping emissions would be reduced compared to the Project. However, maximum daily emissions would be generally similar

to the Project since the maximum daily number, type and use of construction equipment would be similar. ~~As with the Project, maximum daily CO emissions under Alternative 2 from construction activities that would overlap with the interim operations would still be significant and unavoidable.~~ Under both the Project and Alternative 2, net regional interim and full operational emissions ~~for full operation~~ of either would be mitigated to below the SCAQMD significance thresholds. However, because Alternative 2 would reduce the duration of overlapping emissions during the interim operation period and reduce VMT (mobile source emissions) during operation compared to the Project, Alternative 2's impacts related to criteria pollutants would be less than the Project's ~~significant and unavoidable~~ less-than-significant impact (with mitigation).

17. Page V-28, Subsection 6.b)(2)(a)(iii)(b), *Operation*, revise the 4th sentence of the paragraph as follows:

Alternative 2 would have a similar mix of uses as the Project, ~~except it would not include a hotel,~~ and would have the same amount of overall floor area.

18. Page V-33, Subsection 6.b)(2)(f), Land Use and Planning, revise the 1st paragraph as follows:

The Project and Alternative 2 would have a relatively similar mix of uses ~~(except Alternative 2 would not have a hotel component),~~ the same floor area, and the same FARs of 7.13:1. As with the Project, Alternative 2 would not conflict with land use plans and policies adopted to eliminate or mitigation significant impacts, including SCAG's 2020-2045 RTP/SCS, the City of Los Angeles General Plan, the Central Industrial District Redevelopment Project, or the Adaptive Reuse Ordinance to develop a live/work and residential community in downtown Los Angeles or with policies of the Adaptive Reuse Ordinance to revitalize and facilitate the development of a "24-hour city" and to encourage mixed commercial and residential uses that improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, ~~hotels,~~ and transit services near each other. Both the Project and Alternative 2 would result in the same significant and unavoidable impacts to a historic resource, and thus, would result in the same land use consistency determinations. Although both the Project and Alternative 2 would potentially conflict with the objectives of the Adaptive Reuse Ordinance to facilitate the conversion of older, economically distressed, or historically significant buildings to apartments, live/work units or visitor-serving facilities, a purpose of the Ordinance is to encourage mixed commercial and residential uses to improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, ~~hotels,~~ and transit services near each other.

19. Page V-38, Subsection 6.b)(2)(h)(b), *Operation*, revise the 1st paragraph as follows:

Alternative 2 would have the same development program as the Project in terms of residential units, office, and commercial uses. Thus, the number of residents and employees would be the same as the Project. ~~'s proposed 1,589 housing units and reduced commercial floor area, as shown in Table V-3, Alternative 2 Population and~~

~~Employment Growth Compared to the Project, would increase the Project's residents from 3,423 to 3,575 and reduce the total net employees from 1,975 to 1,941. Alternative 2 would comprise approximately 1.35 percent of SCAG's year 2030 estimated increase of 117,517 City of Los Angeles households and the Project would comprise approximately 1.30 percent of SCAG's year 2030 estimated increase in households. As with the Project, Both Alternative 2 would represent less than 0.5 percent of SCAG's estimated increase of 337,862 households for the City in 2045. This growth would contribute toward the attainment of City and regional goals and policies to encourage housing development in the greater Los Angeles area. The Project Site is located within a TPA and a SCAG-designated HQTa in which higher density growth is encouraged through the City's TPA and SCAG policies. The Project Site's accessibility to transit would help the City increase housing within these transit priority areas, and would contribute to the City's ability to meet its housing obligation under the Regional Housing Needs Allocation (RHNA). In addition, Alternative 2's and the Project's employment projections would represent 2.5 percent and 2.6 percent, respectively, of SCAG's year 2030 estimated increase of 79,337 employees in the City of Los Angeles.~~

20. Page V-38, Subsection 6.b)(2)(h)(b), *Operation*, remove Table V-3 as follows:

TABLE V-3
~~ALTERNATIVE 2 POPULATION AND EMPLOYMENT GROWTH COMPARED TO THE PROJECT~~

Use	Number of Residents and Employees – Project^a	Number of Residents and Employees – Alternative 2^b
<i>Total Residential Population</i>	<i>3,423</i>	<i>3,575^c</i>
Employees:		
Employees	2,044	2,010
<i>Existing Industrial</i>	<i>69 to be removed</i>	<i>69 to be removed</i>
<i>Net Total Employees</i>	<i>1,975</i>	<i>1,941</i>

NOTE(S):

^a Employment for Project uses was taken from Section IV.H, *Population and Housing*, of this Draft EIR.

^b Employees based on VMT Calculator results provided in Appendix M of this Draft EIR.

^c Total residents are based 1,589 new residential units x 2.25.

SOURCE: ESA, 2023

21. Page V-39, Subsection 6.b)(2)(i)(b), *Operation*, revise the last two sentences of the paragraph as follows:

Therefore, impacts to fire protection and emergency medical services during operation of either the Project or Alternative 2 would be less than significant (with mitigation). ~~Because the overall service population (employees and residents) would be slightly higher under Alternative 2 than the Project, impacts would be greater than the Project's less than significant impacts (with mitigation) on fire protection services.~~

22. Page V-40, Subsection 6.b)(2)(i)(ii)(b), *Operation*, revise the paragraph as follows:

The increase in residents under the Project and Alternative 2 would increase the Central Community Police Station's resident to officer ratio. The Project and Alternative 2 would increase residential population from approximately 40,000 to ~~43,423~~ 43,575 and ~~Alternative 2 would increase the residential population from approximately 40,000 to 43,575.~~ With 308 sworn officers, the Central Community Police Station has a resident to officer ratio of 129.8:1. The Project and Alternative 2 would increase the resident to officer ratio from 129.8:1 to approximately 141:1 141.5:1. ~~With additional residential units, Alternative 2 would incrementally increase the resident to officer ratio from 129.8:1 to 141.5:1 (compared to 141:1 under the Project).~~ Thus, ~~no material difference to the resident to officer ration would occur between the Project and Alternative 2.~~ Under both the Project and Alternative 2, this resident to officer ration increase would still be substantially below the Citywide average of one officer per 423 residents. In addition, both the Project and Alternative 2 would implement Project Design Feature POL-PDF-2, which would include a security program, such controlled access, camera surveillance, and on-site security personnel that would reduce demand on police services. Accordingly, there would be no need for expanded police facilities to accommodate increased demand. Moreover, LAPD correspondence stated that the Project would not result in the need for new or altered police facilities.⁶ ~~Given the small increase in the ratio of residents to officers between the Project and Alternative 2, and that b~~ As both the Project and Alternative 2 would implement Project Design Feature POL-PDF-2, the LAPD's determination would be equally applicable to Alternative 2. Thus, neither the Project nor Alternative 2 would result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, the construction of which would cause significant environmental impacts. As such, impacts relative to police services would be less than significant under both the Project and Alternative 2. ~~However, because the residential service population would be higher under Alternative 2, impacts would be greater than the Project's less than significant impact.~~

23. Page V-41, Subsection 6.b)(2)(i)(iii)(b), *Operation*, revise the 1st paragraph as follows:

~~As shown in Table V-4, Estimated Number of Students Generated by Alternative 2, Alternative 2 would generate a total net increase of 948 students. In comparison Similar to, the Project, Alternative 2 would generate a net increase of 940-970 students. Similar to the Project, under Alternative 2, the 9th Street Elementary School and Hollenbeck Middle School would have a potential shortage in seats with Alternative 2, while the Belmont Zone of Choice schools would continue to have a seating overage.~~

24. Page V-41, Subsection 6.b)(2)(i)(iii)(b), revise the 2nd paragraph as follows:

Under either the Project or Alternative 2, pursuant to SB 50, the Project Applicant would be required to pay development fees LAUSD prior to issuance of building permits. Under Government Code section 65995 and 65996, the payment of these fees is considered full and complete mitigation of school impacts. Therefore, neither the Project nor Alternative

2 would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities and impacts would be less than significant. However, because Alternative 2 would result in a higher generation of students, operational impacts on schools would be greater than the Project's less than significant impacts.

25. Page V-42, Subsection 6.b)(2)(i)(iii)(b), *Operation*, remove Table V-4 as follows:

TABLE V-4
~~ESTIMATED NUMBER OF STUDENTS GENERATED BY ALTERNATIVE 2~~

Land Use	Use^{a,b}	Generation Factors	Elementary School Students	Middle School Students	High School Students	Total^c
Proposed Uses						
Residential Multi-Family	1,589 units	Elm: 0.1953/unit MS: 0.0538/unit HS: 0.1071/unit	310	85	170	565
Retail/Restaurant	113,565 sf	0.467 students/ksf	29	8	16	53
Office	411,113 sf	0.826/ksf	187	51	102	340
<i>Total Students Generated by Proposed Uses</i>			526	144	288	958
Existing Uses						
North Site Cold Storage/ Warehouse	167,596 sf	0.010 students/ksf	2	0	4	3
South Site Office	2,871 sf	0.826/ksf	2	4	4	4
South Site Cold Storage/ Warehouse	190,267 sf	0.010 students/ksf	2	0	4	3
<i>Total Students Generated by Existing Uses</i>			6	4	3	10
Net Total (Proposed Less Existing)			520	143	285	948

NOTE(S): ksf = 1,000 square feet

^a Student generation rates for residential uses are based on Table 3 of the LAUSD Developer Fee Justification Study, March 2022.

^b Student generation for the retail/ restaurant uses is based on the Neighborhood Shopping Center student generation rates; student generation for offices is based on Standard Commercial Offices; and student generation for hotel uses is based on Lodging rates as provided in Table 15 of the LAUSD 2022 Developer Fee Justification Study, March 2022. Since the Developer Fee Justification Study does not specify grade levels for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.

^c Input totals for elementary, middle and high schools have been rounded based on generation factors to equal total number of students.

SOURCE: ESA, 2023.

26. Page V-43, Subsection 6.b)(2)(i)(iv)(b), *Operation*, revise the paragraph as follows:

Both the Project and Alternative 2 would provide approximately two acres of publicly-accessible open space, consisting of plazas and paseos and amenities, as well as recreational facilities for on-site residents. However, open space under either the Project or Alternative 2 would not meet the recommended 2.0 acres of neighborhood recreation sites per 1,000 persons (6.85 acres for the Project's anticipated population increases of ~~3,423~~ 3,576 residents and ~~7.2 acres for Alternative 2's population increase of 3,575 residents~~) and 2.0 acres of community recreational sites per 1,000 persons (~~6.85 acres for the Project and 7.2 acres for Alternative 2~~) in the amended PRP. The PRP parkland guidelines, however, are Citywide goals and do not constitute requirements for individual development projects. Population increases under both the Project and Alternative 2 would increase demand for recreational facilities. The Project and Alternative 2's publicly-accessible open space and private, common recreational amenities would fulfill some of the Project and Alternative 2's demand on RAP facilities. In addition, LAMC Section 21.10.3 sets a per-capita construction tax of \$200 per new eligible residential unit for City acquisition of new park space, with the set-aside or dedication of parkland and recreational facilities and/or payment of in-lieu fees under LAMC Section 12.33H credited against the payment of this tax. With the required payment of in-lieu fees, the Project would meet LAMC open space and parkland requirements. As such, similar to the Project, Alternative 2 would not result in significant impacts associated with the construction of new or physically altered government facilities. ~~However, since Alternative 2 would generate more residential population and therefore result in a higher demand for parkland than under the Project, impacts~~ Impacts on parks and recreational facilities would be ~~greater than similar to~~ the Project's less than significant impacts.

27. Page V-44, Subsection 6.b)(2)(i)(v)(b), *Operation*, revise the paragraph as follows:

The increase in residents and employees at the Project Site would increase demand for library services in the Project area. However, the LAPL has stated there are no planned improvements to add capacity to the two nearest community libraries (the Little Tokyo and the Benjamin Franklin branches). LAPL has determined through its Facilities Plan that a new branch library would not be considered until the service population for a particular branch library has reached 90,000. The Project and Alternative 2 would result in a population increase of 3,576 ~~and the Project would result in a residential population increase of 3,423~~. Since the Little Tokyo Branch Library currently has a service population of 45,796 and the Benjamin Franklin Branch Library currently has a service population of 40,319, neither branch library serving the Project Site would exceed the LAPL's criterion of 90,000 in service population with the addition of either the Project or Alternative 2. Moreover, both the Project and Alternative 2 would generate revenue for the City's General Fund that would help offset the increase in demand for library services. As such, operation of either the Project or Alternative 2 would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts. Impacts to libraries would be less than significant under the Project and Alternative 2. ~~However, since Alternative 2 would~~

~~generate more residential population and therefore higher demand for libraries than under the Project, impacts would be greater than the Project's less than significant impact.~~

28. Page V-45, Subsection 6.b)(2)(j)(iii), *Consistency with CEQA Guidelines Section 150643, Subdivision (b)*, revise the paragraph as follows:

The VMT for employees and residents under Alternative 2 was calculated utilizing the City of Los Angeles VMT Calculator and accounting for TDM measures similar to the Project TDM strategies, such as reduced parking, bicycle parking, and shared mobility; and other factors, such as home-based workspace. As shown in Appendix ~~M-H~~ of this ~~Draft-Final~~ EIR, according to the VMT Calculator, Alternative 2 would generate ~~42,357~~ 14,121 daily trips and ~~80,730~~ 92,835 daily VMT. Alternative 2's per capita household VMT would be 3.6 and per capita employee VMT would be ~~5.9~~ 6.0. As such, Alternative 2 would reduce the Project's ~~44,405~~ 15,143 daily trips, ~~94,270~~ 99,069 daily VMT, per capita household VMT of ~~3.9~~ 3.8 and per capita employee VMT of ~~6.5~~ 6.4. As with the Project, Alternative 2 would not result in VMT impacts that exceed the Central APC threshold per household of 6.0 or Central APC employee VMT threshold of 7.6. Through the Memorandum of Understanding (MOU) process in preparation of the Project's Transportation Assessment (TA),⁷ LADOT agreed that the proposed retail and restaurant uses would be locally serving and, as such, neither the Project nor Alternative 2 would be a regional-serving retail use. Impacts regarding VMT under both the Project and Alternative 2 would be consistent with the LADOT's TAG and, thus, consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts under either the Project and Alternative 2 would be less than significant. However, because Alternative 2 would have a lower household VMT per capita and VMT per employee compared to the Project, Alternative 2's impacts would be less than the Project's less than significant VMT impacts.

29. Page V-45, Subsection 6.b)(2)(j)(iii), Geometric Design Hazards, revise the 1st sentence of the paragraph as follows:

~~Alternative 2 would reduce the Project's daily vehicle trips due to reduced parking and along with its mix of land uses.~~

30. Page V-47, Subsection 6.b)(2)(l)(i)(b), revise the 1st paragraph as follows:

The Project Site does not currently have adequate fire flow to serve either the Project or Alternative 2 or demonstrate compliance with Section 57.507.3 of the LAMC. This potentially significant impact would be reduced to a less than significant level with the implementation of Mitigation Measure PS-MM-1, which provides upgrades to the water infrastructure serving the Project Site. Both the Project and Alternative 2 would increase long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Domestic water demand for the Project, subtracting water conservation features, is estimated to be approximately 415,531 gpd or 465 acre-feet per year (AFY) (see Table IV.L.1-7, *Estimated Project Water Demand*, in Section IV.L.1, *Utilities and Service Systems - Water Supply*, of this Draft EIR). ~~Of this total, the Project's~~

~~hotel rooms would account for 7,928 gpd and the hotel bar would account for 1,094 gpd, for a total of 9,022 gpd. The hotel would not be included as part of Alternative 2. Also, under the Project, the 1,521 residential units would have a water demand of 141,769 gpd. This equates to 93.2 gpd per unit. Thus, under Alternative 2, at 93.2 gpd per unit, 1,589 residential units would generate 148,095 gpd. Accordingly, the residential units under Alternative 2 would generate an additional 6,376 gpd compared to the Project. However, on balance, by removing the hotel use and accounting for the increased number of residential units compared to the Project, Alternative 2 would result in a reduction of 2,646 gpd or 2.97 AFY of water demand. With the same mix of uses as the Project, Alternative 2 would have a similar water demand as the Project.~~

31. Page V-47, Subsection 6.b)(2)(I)(i)(b), *Operation*, revise the last sentence of the 2nd paragraph as follows:

~~However, because Alternative 2 would have a lower water demand compared to the Project, Alternative 2's impacts would be less than similar to the Project's less than significant water impacts.~~

32. Page V-48, Subsection 6, *Alternatives Analysis*, Subsection b) *Alternative 2: At Grade Parking Alternative*, Subsection (2) *Environmental Impacts*, Subsection (I), *Utilities and Service Systems – Water Supply, Wastewater, Solid Waste, Electricity, and Natural Gas*, Subsection (ii), *Wastewater*, Subsection (b), *Operation*, revise the 1st paragraph as follows:

~~Wastewater generation for the Project was estimated at 588,278–620,709 gpd (see Table IV.L.2-1, *Wastewater Generation during Project Operation*, of this Draft EIR). Of this total, the Project's hotel rooms would account for 8,160 gpd and the hotel bar would account for 555 gpd, for a total of 8,715 gpd. The hotel would not be included as part of Alternative 2. Also, under the Project, the 1,521 residential units would have a total wastewater demand of 168,330 gpd. This equates to 110 gpd per unit. Thus, under Alternative 2, at 110 gpd per unit, 1,589 residential units would generate 174,790 gpd. Accordingly, the residential units under Alternative 2 would generate an additional 6,460 gpd compared to the Project. However, on balance, by removing the hotel use and accounting for the increased number of residential units compared to the Project, Alternative 2 would result in a reduction of 2,255 gpd of wastewater generation. With the same mix of uses as the Project, Alternative 2 would have similar wastewater generation as the Project.^{8b}~~

^{8b} See Appendix G of the Final EIR for the wastewater calculations associated with the Project design modifications.

33. Page V-48, Subsection 6.b)(2)(I)(ii)(b), *Operation*, revise the last sentence of the 2nd paragraph as follows:

~~However, because Alternative 2 would have a similar lower wastewater generation compared to the Project, Alternative 2's impacts would be less than the Project's less than significant and similar to the Project wastewater impacts.~~

34. Pages V-49 and V-50, Subsection 6.b)(2)(I)(iii)(b), *Operation*, revise the paragraph and remove Table V-5 as follows:

~~Alternative 2's estimated solid waste generation is illustrated in **Table V-5, Alternative 2 Operational Solid Waste Generation**. As shown in Table V-5, Alternative 2 would generate approximately 5,082 net tons of solid waste per year, not taking into account a diversion rate of 65 percent.⁴⁰ With required diversion, the Project and Alternative 2 would produce 1,779 1,868 net tons of solid waste per year and Alternative 2 would produce 1,779 net tons of solid waste per year. Both the Project and Alternative 2 would provide on-site recycling collection facilities for occupants. The County expects that approximately 140,074,607 additional tons of the remaining 142.67-million-ton capacity would be used in 2030, the earliest anticipated year of Project buildout.¹¹ Alternative 2's and the Project's estimated annual solid waste generation would represent a fraction of one percent of the remaining capacity in 2030. As with the Project, Alternative 2's solid waste generation would be accommodated by landfills with adequate capacity and, as such, impacts would be less than significant. Since Alternative 2 would generate a similar amount of solid waste requiring landfill disposal, impacts would be similar to the Project's less than significant impact.~~

⁴⁰ ~~County of Los Angeles Department of Public Works, ColWMP 2020 Annual Report, October 2021, page 41.~~

**TABLE V-5
ALTERNATIVE 2 OPERATIONAL SOLID WASTE GENERATION**

Land Use	Quantity^a	Daily Generation Factor^b	Solid Waste Generation (tons/year)	Solid Waste Generation (lbs/day)
Proposed New Uses				
Residential	1,589 units	0.87 tons/unit/year	1,382	7,573
General Retail	45,266 sf (91 emp)	1.96 tons/emp/year	178	975
Restaurant (High Turnover and Quality Restaurant)	68,299 sf (275 emp)	1.92 tons/emp/year	528	2,893
General Office	411,113 sf (1,644 emp)	2.02 tons/emp/year	3,321	18,197
Hotel	-	-	-	-
Proposed Subtotal (pre-diversion)	—	—	5,409	29,638
Existing Uses	69 emp.		(327)	(1,793)
Net Increase (Pre-diversion)			5,082	27,845
Net Increase (post-diversion)^c	—	—	1,779	9,746

NOTE(S):

^a Number of employees per use are based on Table IV.L.3-3, Estimated Operational Solid Waste Generation, in Section IV.L.3, *Utilities and Service Systems—Solid Waste*, of this Draft EIR.

^b Generation factors are provided by CalRecycle's Disposal and Diversion Rates for Business Groups, <https://www2.calrecycle.ca.gov/wastecharacterization/businessgroup/rates>. Accessed February 24, 2022.

^c Based on an anticipated diversion rate of 65 percent for operations, which was assumed in the ColWMP 2020 Annual Report. This is conservative as the actual diversion is likely to be higher with increasing compliance with the State's recycling goal of 75 percent.

SOURCE: ESA, 2023.

35. Page V-51, Subsection 6.b)(2)(i)(iv)(b), *Operation*, revise the 1st and 2nd sentence of the paragraph as follows:

Alternative 2 would have the same LAMC-defined total floor area (2,318,534 sf) and result in a largely similar mix of uses as the Project ~~(except it would not include a hotel use)~~. Alternative 2's net increase in operational electricity usage would be generally similar to the Project's approximately 21,093,357 kWh usage as both the Project and Alternative 2 would develop the same amount of new floor area for residential, office, and restaurant/retail uses.

36. Page V-52, Subsection 6.b)(3), *Relationship of the Alternative to Project Objectives*, revise the 1st paragraph and the 1st objective as follows:

Alternative 2 would have the same total floor area and result in ~~a largely similar~~ the same mix of uses as the Project. ~~However, the Project's hotel use would be eliminated, and the Project's residential uses would be increased from 1,521 to 1,589 units. The Project's 2,475-2,444 parking spaces would be reduced to 990 spaces, a reduction of 60 percent.~~ All vehicle parking would be located in above-grade podium structures within the footprint of the respective 10 buildings, thus, eliminating subterranean parking and reducing excavation and hauling activities. The parking podiums would increase the heights of the buildings but would not affect specific Project Objectives. As such Alternative 2 would fully meet the Project's Objectives, all of which are listed below.

Objective 1: Provide a mixed-use development that introduces an array of new residential, office, ~~hotel~~, and commercial opportunities to the Central City neighborhood.

37. Page V-53, Subsection 6.c)(1), *Description of the Alternative*, revise the 1st sentence of the 2nd paragraph as follows:

Another major difference between the Project and Alternative 3 is the reduction from ~~2,475~~ 2,444 parking spaces under the Project to 990 parking spaces under Alternative 3.

38. Page V-54, Subsection 6.c)(1), *Description of the Alternative*, revise the 2nd paragraph on the page as follows:

To account for the removal of the all-new development from the North Site, Alternative 3 would develop a 44 story, 506-foot-high mixed-use tower on the South Site. The new high-rise building, designated as Building 1 under Alternative 3, would be located at the south side of 4th Street in the approximate location of the Project's designated Building 3. **Table V-6, *Alternative 3 Uses Compared to the Project***, below, compares the changes in the South Site and West Site buildings compared to the Project. To accommodate the higher floor area on the South Site, adjustments were made in building heights, floor areas, and uses for the South and West Site's other eight buildings, as shown in Table V-6. As further shown in Table V-6, total residential units in the new Building 1 were reduced and office floor area was added as compared to the Project's Building 2. Building 2's restaurant and retail uses were retained and reduced. ~~Similar to Alternative 2, the Project's hotel would be removed under Alternative 3. The 68 hotel rooms in the Project's Building 6 (Alternative 3's Building 4) were changed to 30 residential units and the~~ The heights of the ~~remainder of~~ Alternative 3's buildings (Buildings 2, 3, 4, 6, 5, 7, and 8, and 9) were reduced compared to the Project. Overall, residential units were reduced from a total of ~~1,521~~ 1,589 units under the Project to 1,049 units under Alternative 3 (a ~~31~~ 34-percent reduction). Office floor area was reduced from a total of 411,113 sf under the Project to a total of 282,005 sf under Alternatives 3 (a 31-percent reduction) and restaurant/retail floor area was reduced from a total of ~~401,088~~ 145,748 sf under the Project to a total of 84,167 sf (including 9,174 sf of outdoor restaurant seating, ~~a 16.7 percent reduction in restaurant space~~).

39. Page V-55, Subsection 6.c)(1), *Description of the Alternative*, revise Table V-6 as follows:

**TABLE V-6
ALTERNATIVE 3 USES COMPARED TO THE PROJECT**

Uses/Features	Project	Alternative 3
Total Industrial Uses to Remain (LACS Building)	0 sf	167,596 sf
Total Res. Units	~~1,524~~ <u>1,589</u> Units	1,049 Units
Total Restaurant/ Retail (LAMC Floor Area)	~~101,088~~ <u>145,748</u> sf	74,993 sf (indoor) + 9,174 (sf outdoor) = 84,167 sf
Total Office	411,113 sf	282,005 sf
~~Total Hotel~~	~~74,484 sf~~ ~~(68 Rooms)~~	~~No Hotel~~
Total Parking	~~2,475~~ <u>2,444</u> spaces	990 spaces
Total New Floor Area	2,318,534 sf	1,613,801 sf
Total Floor Area:	2,318,534 sf	1,781,397 sf (incl. 167,596 sf existing industrial use)
Total Grading	651,000 CY	321,365 CY
FAR:	7.13:1	5.9:1 (new development only); 6.51:1 (all development across the Project Site including industrial uses to remain)
SOURCE: Studio One Eleven, 2023. <u>Updated in May 2024.</u>		

40. Page V-58, Subsection 6.c)(2)(a)(ii)(b), *Operation*, revise the two paragraphs as follows:

Alternative 3 would reduce the Project's residential units, office floor area, and restaurant/retail uses, ~~and would eliminate the hotel use.~~ These changes would reduce overall activity during occupation compared to the Project. Despite its reduced size, Alternative 3, as with the Project, would result in overlapping interim operation and construction activities. The Project is expected to be partially operational by year 2027 with continued construction of the remaining buildings. The net concurrent operations-related daily emissions from construction activities that would overlap with the interim operations under either the Project or Alternative 3 would exceed the SCAQMD thresholds of significance for VOC and NO_x. The exceedance in NO_x is primarily from mobile sources and from emergency generator testing emissions, as well as concurrent construction activities emissions during interim operations. Under both the Project and Alternative 3, implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features) would minimize regional VOC and

NO_x emissions from construction activities that would overlap with the interim operations. In addition, under both the Project and Alternative 3, implementation of Mitigation Measures AQ-MM-3, AQ-MM-4 (Electric Landscaping Equipment) and AQ-MM-5 (Use of Super-Compliant VOC Paints) would reduce regional VOC and NO_x emissions associated with the testing of the emergency generators, landscaping equipment and architectural coatings, respectively, and net regional operational emissions for full operation. Thus, under both the Project and Alternative 3, NO_x and CO would be reduced to below the SCAQMD regional significance threshold from construction activities that would overlap with the interim operations. However, because Alternative 3 would reduce overall construction activities, it would reduce the duration of overlapping construction emissions with interim operations that include the South Site. Additionally, Alternative 3 would eliminate the overlapping construction with interim operations emissions scenarios that include the North Site as no construction would occur on that site. ~~However, CO emissions from construction activities that would overlap with the interim operations during the Project or Alternative 3 would exceed the SCAQMD regional significance threshold with implementation of Mitigation Measures AQ-MM-1 and AQ-MM-2 and impacts would be significant and unavoidable.~~

The Project's net operations-related daily emissions would also exceed the SCAQMD thresholds of significance for VOC resulting primarily from the architectural coating phases where painting of interior and exteriors of the buildings would occur. Project-level net regional operational emissions for the Project or full Alternative 3 operations would be mitigated to below significant thresholds for VOC. ~~However, CO emissions from construction activities that would overlap with the interim operations of Alternative 3 or the Project would still be significant and unavoidable.~~ Net regional interim or full operational emissions for full operation of either the Project or Alternative 3 would be mitigated to below the SCAQMD significance thresholds. However, because Alternative 3 would reduce overall construction activities, it would contribute less to overlapping operational emissions. Therefore, operational emission impacts would be less under Alternative 3 than the Project's ~~significant and unavoidable emissions less than~~ significant impact (with mitigation).

41. Page V-63, Subsection 6.c)(2)(c)(ii), *Operation*, revise the paragraph as follows:

Alternative 3 would reduce occupancy of the Project Site by approximately 31 percent and parking by 60 percent. The Project's net annual average operational electricity demand would be approximately ~~21,093,357~~ 19,700,131 kWh. The Project would result in a net reduction in natural gas demand of approximately ~~4,506,825~~ 4,211,027 cubic feet inclusive of Project operation activities related to transportation sources (i.e., natural gas-fueled vehicles) as compared to existing conditions. However, since the current operations at the North Site would continue under Alternative 3, the net reduction in natural gas demand as compared to existing conditions would decrease under Alternative 3 as compared to the Project, but would still result in a net reduction in natural gas demand under Alternative 3 compared to existing conditions. Transportation for the Project would result in a net annual demand of ~~998,340~~ 1,111,103 gallons of gasoline and the Project

would generate a net reduction of ~~190,414~~ 170,628 gallons in the existing demand for diesel fuel (see ~~Table IV.C-2~~ Table IV.C-4, *Summary of Annual Net New Energy Use During Project Operation – Project*, of this Draft EIR). However, since the current operations at the North Site would continue, diesel fuel usage would increase under Alternative 3 since existing diesel usage across the Project Site is currently ~~376,917~~ 405,691 gallons, and diesel usage for the Project would be ~~489,305~~ 237,531 gallons. Demand under either the Project or Alternative 3 would be within the handling capacity of suppliers. Alternative 3 would reduce the Project's VMT and demand for gasoline as compared to the Project as the existing cold storage facility usage of gasoline is lower than the residential, restaurant/retail uses that would be developed under the Project. Gasoline demand under either the Project or Alternative 3 would be within the handling capacity of suppliers. Operation of both the Project and Alternative 3 would comply with the CALGreen Code's energy saving measures. In addition, the Project and Alternative 3 would comply with other energy-saving measures to achieve a minimum LEED Gold Certification, incorporate tree landscaping to provide solar shading, and use cool roof/pavement coatings to reduce the urban island effect. Other building features would include installation of energy-efficient heating, ventilation, and HVAC systems that utilize ozone-friendly refrigerants, and dedicated on-site recycling areas. The Project and Alternative 3 would both include water sustainability features, which would include, but not be limited to, low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment. Operation of the Project and Alternative 3 would not result in the wasteful, inefficient, and unnecessary consumption of energy and, as such, energy impacts would be less than significant. However, because of the 60 percent reduction in on-site parking under Alternative 3 and smaller scale of development, impacts on overall energy demand would be less than the Project's less than significant impact.

42. Page V-65, Subsection 6.c)(2)(f), *Land Use and Planning*, revise the 3rd sentence and the 7th sentence in the paragraph as follows:

Alternative 3 would not provide any new development on the North Site. Alternative 3, which would provide new uses on the South and West Sites only, would reduce the Project's overall floor area by approximately 30 percent. As with the Project, Alternative 3 would not conflict with land use plans and policies adopted to eliminate or mitigation significant environmental impacts, including SCAG's 2020-2045 RTP/SCS, the City of Los Angeles General Plan, the Central Industrial District Redevelopment Project, or the Adaptive Reuse Ordinance to develop a live/work and residential community in downtown Los Angeles or with policies of the Reuse Ordinance to revitalize and facilitate the development of a "24-hour city" and to encourage mixed commercial and residential uses that improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, ~~hotels~~, and transit services near each other. However, with the reduction in scale and provided residential units, Alternative 3 would not facilitate the implementation of these policies to the same extent as under the Project. In addition, Alternative 3 would not implement the

policies of the Housing Element or the designated Greater Downtown Housing Incentive Area to increase housing opportunities in proximity to transit or in the Downtown; the policies of the Redevelopment Plan for the Central Industrial Redevelopment Project to provide affordable residences and open space that are accessible to public transportation; or the policies of the 2020-2045 RTP/SCS to co-locate housing, jobs, and transit to the same extent as under the Project. Alternative 3 would retain the historic LACS Building consistent with the Adaptive Reuse Ordinance to retain and reuse the City's older buildings. However, because the physical effects of the removal of the LACS Building are evaluated and disclosed in full in Section IV.B, *Cultural Resources*, of this Draft EIR, as well as accounted for in other sections of the Draft EIR, and because Alternative 3 would be consistent with the Adaptive Reuse Ordinance to locate residents, jobs, ~~hotels~~ and transit services near each other, Alternative 3 would not result in a significant land use impact. Overall, as with the Project, Alternative 3 would not result in a substantial conflict with applicable land use plans, policies, or regulations and land use impacts. However, because Alternative 3 would not meet housing policies to the same extent as the Project, impacts would be greater than the Project's less-than-significant land use impacts.

43. Page V-69, Subsection 6.c)(2)(g)(ii)(b), *Operation*, revise the last sentence in the paragraph as follows:

As such, under both the Project and Alternative 23, vibration impacts associated with human annoyance or building damage would be less than significant and similar.

44. Page V-70, Subsection 6.c)(2)(h)(ii), *Operation*, revise the 1st paragraph as follows:

Alternative 3 would not provide any new development on the North Site. Alternative 3, which would provide new uses on the South and West Sites only, would reduce the Project's overall floor area by approximately 30 percent. A comparison of both the Project and Alternative 3's estimated housing and employment increases is provided in **Table V-7, Alternative 3 Population and Employment Growth Compared to the Project**, below. As shown in Table V-7, Alternative 3 would reduce the Project's total residents from ~~3,423~~ 3,576 to 2,360. With the reduction in restaurant/retail use and office floor area, Alternative 3 would reduce the Project's total new employees from ~~2,408~~ 2,142 to 1,397.

45. Pages V-70 and V-71, Subsection 6.c)(2)(h)(ii), *Operation*, revise Table V-7 as follows:

TABLE V-7
ALTERNATIVE 3 POPULATION AND EMPLOYMENT GROWTH COMPARED TO THE PROJECT

Use	Number of Residents and Employees - Project ^a	Number of Residents and Employees - Alternative 3 ^b
Total Residential Population	~~3,423~~ <u>3,576</u>	2,360^c
Employees:		
Employees	~~2,044~~ <u>2,142</u>	1,397
Existing Industrial	69 to be removed	32 to remain
Net Total Employees	~~1,975~~ <u>2,073</u>	1,365

NOTE(S):

^a Employment for Project uses was taken from Section IV.H, *Population and Housing*, of this Draft EIR.

^b Employees based on VMT Calculator results provided in Appendix M of this Draft EIR.

^c Total residents are based 1,049 new residential units x 2.25.

SOURCE: ESA, 2023, Updated in May 2024.

46. Pages V-72 and V-73, Subsection 6.c)(2)(i)(ii)(b), *Operation*, revise the 1st half of the paragraph as follows:

The increase in residents under the Project and Alternative 3 would increase the Central Community Police Station's resident to officer ratio. The Project would increase residential population from approximately 40,000 to ~~43,423~~ 43,576. Alternative 3 would increase the existing residential population in the LAPD Central Community Station service area from 40,000 to 42,360. With 308 sworn officers in the Central Community Station, existing service ratios are 129.8 residents per officer. Under Alternative 3, the resident to officer ratio would increase from 129.8:1 to 140.7:1¹³ and under the Project the resident to officer ratio would increase from 129.8:1 to 141.0:1. Thus, no material difference to the resident to officer ration would occur between the Project and Alternative 3.

¹³ ~~43,323~~ 43,576 residents ÷ 309 sworn officers = one officer per ~~140.7~~ 141 residents.

47. Page V-73, Subsection 6.c)(2)(i)(iii)(b), *Operation*, revise the 2nd sentence in the paragraph as follows:

In comparison, the Project would generate a net increase of ~~940~~ 970 students.

48. Page V-74, Subsection 6.c)(2)(i)(iii)(b), *Operation*, revise the 2nd note at the bottom of Table V-8.

- ^b Student generation for the retail/ restaurant uses is based on the Neighborhood Shopping Center student generation rates and; student generation for offices is based on Standard Commercial Offices; ~~and student generation for hotel uses is based on Lodging rates~~ as provided in Table 15 of the LAUSD 2022 Developer Fee Justification Study, March 2022. Since the Developer Fee Justification Study does not specify grade levels for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school). For the existing dry storage and freezer/cooler uses, the Rental Self Storage factor was used.

49. Page V-75, Subsection 6.c)(2)(i)(iv)(b), *Operation*, revise the 1st and 3rd sentences of the paragraph as follows:

Alternative 3 would reduce the Project's estimated residential population from ~~3,423~~ 3,576 to 2,360. Both the Project and Alternative 3 would provide common and private open space consistent with LAMC requirements. However, open space under either the Project or Alternative 3 would not meet the recommended 2.0 acres of neighborhood recreation sites per 1,000 persons (~~6.85~~ 7.15 acres for the Project's anticipated population increases of ~~3,423~~ 3,576 residents and 4.7 acres for Alternative 3's population increase of 2,360 residents) and 2.0 acres of community recreational sites per 1,000 persons (~~6.85~~ 7.15 acres for the Project and 4.7 acres for Alternative 23) in the amended PRP.

50. Page V-76, Subsection 6.c)(2)(i)(v)(b), *Operation*, revise the 4th sentence of the paragraph as follows:

The Project would generate ~~3,423~~ 3,576 new residents and ~~1,975~~ 2,073 net new employees and Alternative 3 would generate 2,360 new residents and 1,365 net new employees.

51. Page V-77, Subsection 6.c)(2)(j)(ii), *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*, revise the 4th sentence in the paragraph as follows:

As such, Alternative 3 would reduce the Project's ~~14,405~~ 15,143 daily trips, ~~94,270~~ 99,069 daily VMT, per capita household VMT of ~~3.9~~ 3.8 and per capita employee VMT of ~~6.5~~ 6.4.

52. Page V-79, Subsection 6.c)(2)(l)(i)(b), *Operation*, revise the 1st half of the 1st paragraph as follows:

The Project Site does not currently have adequate fire flow to serve either the Project or Alternative 3 or demonstrate compliance with Section 57.507.3 of the LAMC. This potentially significant impact would be reduced to a less than significant level with the implementation of Mitigation Measure PS-MM-1, which provides upgrades to the water infrastructure serving the Project Site. Both the Project and Alternative 3 would increase long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Domestic water demand for the Project, subtracting water conservation features, is estimated to be approximately 415,531 gpd or 465 AFY (see

Table IV.L.1-7, *Estimated Project Water Demand*, in Section IV.L.1, *Utilities and Service Systems - Water Supply*, of this Draft EIR). ~~Of this total, the Project's hotel rooms would account for 7,928 gpd and the hotel bar would account for 1,094 gpd, for a total of 9,022 gpd. The hotel would not be included as part of Alternative 3. Also, under the Project Based on the factors in the WSA,~~ the 1,521 residential units would have a water demand of 141,769 gpd.

53. Pages V-80 and V-81, Subsection 6.c)(2)(i)(ii)(b), *Operation*, revise the 1st and 2nd paragraphs that continue onto page V-81 as follows:

Wastewater generation for the Project was estimated at ~~588,278~~ 620,709 gpd (see Table IV.L.2-1, *Wastewater Generation during Project Operation*, of this Draft EIR). ~~Of this total, the Project's hotel rooms would account for 8,160 gpd and the hotel bar would account for 555 gpd, for a total of 8,715 gpd. The hotel would not be included as part of Alternative 3. Also, under~~ Under the Project, the ~~1,521~~ 1,589 residential units would have a total wastewater demand of ~~168,330~~ 174,715 gpd. This equates to 110 gpd per unit. Thus, under Alternative 3, at 110 gpd per unit, 1,049 residential units would generate 115,390 gpd. Accordingly, the residential units under Alternative 3 would generate ~~52,940~~ 59,325 less gpd compared to the Project. Utilizing the wastewater generation factors in Table IV.L.2-1, Alternative 3's retail uses (33,667 sf) would result in a wastewater generation of 842 gpd (~~290~~ 848 gpd less than the Project); the office uses (282,005 sf) would result in a generation of 47,941 gpd (~~20,691~~ 21,948 gpd less than the Project); and the restaurant uses with 3,366 seats would result in a wastewater generation of 100,980 gpd (~~35,670~~ 80,310 gpd less than the Project) (see Table IV.L.2-1, *Wastewater Generation during Project Operation*, of this Draft EIR). Collectively, Alternative 3's retail, office and restaurant uses would result in a decrease of the Project's wastewater generation by ~~56,651~~ 162,341 gpd for these uses. Based on these reductions, while assuming other components of the Project as shown in Table IV.L.2-1 remain generally similar to the Project, Alternative 3's new uses would result in a net wastewater generation of roughly ~~458,891~~ 387,962 gpd.²⁰

Under Alternative 3, the North Site would remain in operation. With 167,596 sf of existing cold storage facilities located on the North Site, the North Site generated 5,028 gpd of wastewater, based on a generation rate of 30 gpd/1,000 sf. Thus, Alternative 3 would have an overall wastewater generation of approximately ~~463,919~~ 392,990 gpd with the North Site included. Since the Project would generate ~~588,278~~ 620,709 gpd, this represents a reduction of ~~124,359~~ 227,719 gpd compared to the Project.

²⁰ Per Table IV.L.2-1, *Wastewater Generation during Project Operation*, in Section IV.L.2, *Utilities and Service Systems – Wastewater*, of this Draft EIR, the Project's net wastewater generation would be ~~577,197~~ 609,628 gpd. Thus, ~~577,197~~ 609,628 – (8,715 + ~~52,940~~ 59,325 + ~~56,651~~ 162,341) = ~~458,891~~ 387,962 gpd.

54. Page V-82, Subsection 6.c)(2)(l)(iii)(b), *Operation*, revise the 4th sentence of the paragraph as follows:

With required diversion, the Project would produce ~~1,779~~ 1,868 net tons of solid waste per year or ~~9,748~~ 10,236 pounds per day.

55. Page V-84, Subsection 6.c)(2)(l)(iv)(b), *Operation*, revise the 2nd and 3rd sentences of the paragraph as follows:

Alternative 3 would reduce the Project's overall 2,318,534 sf of floor area and occupancy by approximately 30 percent. ~~The Project's hotel use would not be developed, but Alternative 3 would include an otherwise a similar mix of uses as the Project.~~ The Project's annual net increase in operational electricity usage would be approximately ~~21,093,357~~ 19,700,131 kWh.

56. Page V-85, Subsection 6.c)(3), *Relationship of the Alternative to Project Objectives*, revise the 1st paragraph and Objective 1 as follows:

Alternative 3 would not develop the North Site. In addition, the overall floor area and occupancy would be reduced by approximately 30 percent. ~~The Project's hotel would not be constructed.~~ However, the Project's Building 2, a ~~44~~ 30-story mixed-use high-rise formerly located on the North Site, would be constructed on the South Site. Alternative 3 would reduce the overall scale of the Project and meet the intent of the Project with respect to diverse uses, jobs, housing, open space, and upgrade of the Project Site. However, because of the reduction in residential units and elimination of new uses on the North Site, Alternative 3 would substantially, but to a lesser extent than under the Project, meet the Objectives of the Project listed below.

Objective 1: Provide a mixed-use development that introduces an array of new residential, office, ~~hotel~~, and commercial opportunities to the Central City neighborhood.

57. Page V-87, Subsection 6.d)(1), *Description of the Alternative*, revise the 3rd paragraph as follows:

Alternative 4's office floor area is anticipated to generate 4,637 new employees compared to 1,644 new office employees under the Project.²⁵ Unlike the Project, Alternative 4 would not provide any residential, or restaurant/retail, ~~or hotel~~ uses and would not generate any new residential population or restaurant/retail employees.

58. Page V-88, Subsection 6.d)(1), *Description of the Alternative*, revise Table V-88 and revise the 2nd sentence of the paragraph below Table V-88 as follows:

**TABLE V-10
ALTERNATIVE 4 USES COMPARED TO THE PROJECT**

Uses/Features	Project	Alternative 4
Total Industrial Uses to Remain (LACS Building)	0 sf	167,596 sf
Total Res. Units	~~4,524~~ <u>1,589</u> Units	No Housing - 0 units
Total Restaurant/ Retail	~~101,088~~ <u>145,748</u> sf	0 sf
Total Office	411,113 sf	1,159,267 sf
Total Hotel	~~74,484 sf~~ ~~(68 Rooms)~~	~~No Hotel - 0 sf~~ ~~(0 rooms)~~
Total Parking	~~2,475~~ <u>2,444</u> spaces	928 spaces
Total New Floor Area	2,318,534 sf	1,159,267 sf
Total Floor Area:	2,318,534 sf	1,326,863 sf (incl. 167,596 sf existing industrial use)
Total Grading	651,000 CY	40,532 CY
FAR:	7.13:1	4.22:1 (new development only); 4.8:1 (all development across the Project Site including industrial uses to remain)

SOURCE: Studio One Eleven, 2023. Updated in May 2024.

Alternative 4 would also incorporate a six-level, above-grade parking structure to accommodate 928 vehicles. The parking, which would reduce the Project's ~~2,475~~ 2,444 spaces by ~~62.5~~ percent, would be consistent with AB 2097 (effective January 1, 2023) which provides that a jurisdiction shall not impose minimum parking requirements on residential or commercial projects within 0.5 miles of a transit station.

59. Page V-96, Subsection 6.d)(2)(c)(ii), *Operation*, revise the 1st paragraph as follows:

Alternative 4 would eliminate the Project's new proposed uses and structures on the North Site from the scope of the development and reduce the Project's overall new floor area by 50 percent. During Project operations, ~~21,093,357~~ 19,700,131 kWh of electricity would be consumed on an annual basis. The Project would result in a net reduction in natural gas demand of approximately ~~4,506,825~~ 4,211,027 cubic feet inclusive of Project operation activities related to transportation sources (i.e., natural gas-fueled vehicles) as compared to existing conditions. However, since the current operations at the North Site would continue under Alternative 4, the net reduction in natural gas demand as compared to existing conditions would decrease under Alternative 4 as compared to the Project, but would still result in a net reduction in natural gas demand under Alternative 4 compared to

existing conditions. The Project would also result in ~~998,340~~ 1,111,103 gallons of gasoline and a net decrease of ~~490,414~~ 170,628 gallons of diesel on an annual basis (see ~~Table IV.C-2~~ Table IV.C-4, Summary of Annual Net New Energy Use During Project Operation – Project, of this Draft EIR). Alternative 4 would reduce the Project’s on-site parking by 62.5 percent. The reduction in parking would increase reliance on transit and other transportation modes (e.g., bicycles) and would, thus, reduce VMT and demand for gasoline compared to the Project. However, since the current operations at the North Site would continue, diesel fuel usage would increase under Alternative 4 since existing diesel usage across the Project Site is currently ~~376,917~~ 405,691 gallons and diesel usage for the Project would be ~~189,305~~ 237,531 gallons. Demand under either the Project or Alternative 4 would be within the handling capacity of suppliers.

60. Page V-97, Subsection 6.d)(2)(e), *Greenhouse Gas Emissions*, revise the 4th sentence in the paragraph as follows:

During operation, Alternative 4 would reduce parking by 62.5 percent across the Project Site as well as reduce VMT compared to the Project.

61. Pages V-97 and V-98, Subsection 6.d)(2)(f), *Land Use and Planning*, revise the 3rd and 4th sentence of the paragraph that continue onto page V-98, and the 4th sentence on page V-98 as follows:

The Project and Alternative 4 and the Project would be similarly located within the Framework Element’s Downtown Center and would not conflict with the General Plan designation that supports ~~hotels~~, professional offices, corporate headquarters, and high-rise residential towers within the Downtown Center.

These include the Adaptive Reuse Ordinance to revitalize and facilitate the development of a “24-hour city” and to encourage mixed commercial and residential uses that improve air quality and reduce vehicle trips and vehicle miles traveled by locating residents, jobs, ~~hotels~~, and transit services near each other.

62. Page V-103, Subsection 6.d)(2)(h)(ii), *Operation*, revise the 1st paragraph as follows:

Alternative 4 would increase the Project’s office floor area from 411,113 sf to 1,154,267 sf and eliminate the Project’s residential ~~uses, hotel~~, and restaurant/retail uses from the scope of the Project. Alternative 4 would eliminate the Project’s new residential population of ~~3,423~~ 3,576 persons and increase the number of new employees from ~~2,044~~ 2,142 to 4,637 employees (excluding the 32 employees to remain on the North Site).²⁶ The Project Site is located within a TPA and a SCAG-designated HQTa in which higher density growth is encouraged through the City’s TPA and SCAG policies. Both Alternative 4 and the Project would increase employment but only the Project would provide for higher density of housing within a TPA.

63. Page V-104, Subsection 6.d)(2)(i)(i)(b), *Operation*, revise the 1st sentence of the paragraph as follows:

Alternative 4 would reduce the Project's estimated occupancy from ~~2,044~~ 2,142 employees and ~~3,423~~ 3,576 residents (a total of ~~5,467~~ 5,717 employees and residents) to 4,637 employees, as discussed above.

64. Page V-105, Subsection 6.d)(2)(i)(ii)(b), *Operation*, revise the paragraph as follows:

Alternative 4 would reduce the Project's total floor area by 50 percent. Overall, Alternative 4 would reduce the Project's estimated occupancy from ~~2,044~~ 2,142 employees and ~~3,423~~ 3,576 residents (a total of ~~5,467~~ 5,717 employees and residents) to 4,637 office employees, as discussed above. The Project's and Alternative 4's new occupants would affect the demand for police services. However, impacts to police services are based on an increase in the ratio of officers to residential population. Consequently, since Alternative 4 would not directly increase the existing residential population in the LAPD Central Community Station service area, which has a current population of approximately 40,000, Alternative 4 would not directly impact officer per resident service ratios. With 308 sworn officers in the Central Community Station, existing service ratios are 129.8 residents per officer. The Project would increase the resident to officer ration to 141:1. Even if Alternative 4's non-residential population were taken into consideration, Alternative 4 would generate an increase of 4,887 people requiring police protection services, which would be less than the Project's total ~~5,462~~ 5,717 resident and employee population.

65. Page V-106, Subsection 6.d)(2)(i)(iii)(b), *Operation*, revise the 2nd sentence of the 1st paragraph as follows:

As shown in **Table V-11**, *Estimated Number of Students Generated by Alternative 4*, Alternative 4 would generate a total net increase of 946 students. In comparison, the Project would generate a net increase of ~~940~~ 970 students.

66. Page V-108, Subsection 6.d)(2)(i)(v)(b), *Operation*, revise the 2nd sentence of the paragraph, as follows:

The Project would result in a residential population increase of ~~3,423~~ 3,576.

67. Page V-109, Subsection 6.d)(2)(j)(ii), *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*, revise the 4th sentence in the paragraph as follows:

As such, Alternative 4 would reduce the Project's ~~14,405~~ 15,143 daily trips, ~~94,270~~ 99,069 daily VMT, per capita household VMT of ~~3.9~~ 3.8 and per capita employee VMT of ~~6.5~~ 6.4.

68. Page V-111, Subsection 6.d)(2)(m)(ii)(b), *Operation*, revise the 1st sentence of the 1st paragraph as follows:

Wastewater generation for the Project was estimated at ~~588,278~~ 620,709 gpd (see Table IV.L.2-1, *Wastewater Generation during Project Operation*, of this Draft EIR).

69. Page V-113, Subsection 6.d)(2)(m)(iii)(b), *Operation*, revise the 4th sentence of the paragraph as follows:

With required diversion, the Project would produce ~~4,779~~ 1,868 net tons of solid waste per year or ~~9,748~~ 10,236 pounds per day.

70. Page V-115, Subsection 6.d)(2)(m)(iv)(b), *Operation*, revise the 1st paragraph as follows:

Alternative 4 would reduce the Project's overall 2,318,534 sf of floor area by approximately 50 percent. The Project's residential and, restaurant/retail ~~and hotel~~ uses would not be developed under Alternative 4. The Project's annual net increase in operational electricity usage would be approximately ~~21,093,357~~ 19,700,131 kWh. With the 50 percent reduction in Alternative 4's floor area, including elimination of the Project's residential, ~~hotel~~, and restaurant/retail uses, demand for electricity services would be respectively reduced. The increase in annual electricity under the Project and Alternative 4 would represent a fraction of one percent of LADWP's projected sales in 2030 and would be within LADWP's projected electricity supplies.

71. Page V-116, Subsection 6.d)(3), Relationship of the Alternative to Project Objectives, revise the 3rd sentence of the 1st paragraph as follows:

However, because of the elimination of residential units, retail uses, and restaurant uses, ~~and the hotel~~, Alternative 4 would not meet the majority of the Project's Objectives, particularly regarding mixed use and housing.

72. Page V-116, Subsection 6.d)(3), Relationship of the Alternative to Project Objectives, revise Objective 1 at the bottom of the page as follows:

Objective 1: Provide a mixed-use development that introduces an array of new residential, office, ~~hotel~~, and commercial opportunities to the Central City neighborhood.

73. Page V-117, Subsection 7, *Environmentally Superior Alternative*, revise the 2nd sentence of the 1st paragraph as follows:

As shown in **Table V-14**, *Ability of Alternatives to Meet Project Objectives*, the No Project/No Build Alternative would not allow for the underlying purpose of the Project to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, office, retail, ~~hotel~~ and restaurant uses, as well as provide publicly-accessible open spaces, to revitalize the

Project Site and the surrounding neighborhood, promote walkability and use of public transit, or to enhance the City's economic base.

74. Page V-117, Subsection 7, *Environmentally Superior Alternative*, revise the 2nd paragraph as follows:

As shown in Table V-13, all of the Project Alternatives would result in a reduction of some of the Project's environmental impacts. Alternative 2 would reduce the Project's parking by 60 percent and locate parking in above-grade podiums. This, in turn, would reduce excavation and hauling activities needed for subterranean structures by approximately 94 percent. As discussed above, Alternative 2 would reduce construction emissions and noise impacts due to substantially reduced excavation and hauling activities. However, due to the scale of development and concrete pours for building podiums and foundations, including overlapping construction/operation phases, Alternative 2 would not reduce construction emissions, noise, and vibration impacts to less than significant levels, although the durations of the significant and unavoidable impacts would be reduced compared to the Project. Moreover, Alternative 2 would include the North Site in the scope of development and would not reduce the Project's significant and unavoidable impact on the historic LACS Building. ~~Although Alternative 2 would eliminate the Project's hotel, the hotel floor area would be ascribed to additional residential units. With increase a similar~~ in-residential population compared to the Project, Alternative 2 would result in similar ~~greater~~ operational Public Service impacts (Fire, Police, Schools, Parks, and Libraries). Alternative 2 offers a similar scale of development and mix of uses to the Project, including affordable housing units, ~~but without a hotel use~~. In this way, Alternative 2 would more closely meet the Project's underlying purpose and Project Objectives than Alternatives 3 and 4.

75. Pages V-119, Subsection 7, *Environmentally Superior Alternative*, revise Table V-13 (under Cumulative Increase of Criteria Pollutants) as follows:

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Air Quality					
Cumulative Increase of Criteria Pollutants					
Construction	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
Operation	~~Significant and Unavoidable~~ <u>Less than Significant</u> with Mitigation	Less (No Impact)	~~Less (Significant and Unavoidable)~~ <u>Less Than Significant</u> with Mitigation	~~Less (Significant and Unavoidable)~~ <u>Less Than Significant</u> with Mitigation	Less (Less than Significant with Mitigation)

76. Pages V-122 and V-123, Subsection 7, *Environmentally Superior Alternative*, revise Table V-13 (under Public Services) as follows:

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Public Services					
Fire Protection					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant with Mitigation	Less (No Impact)	~~Greater~~ <u>Similar</u> (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant)
Police Protection					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	~~Greater~~ <u>Similar</u> (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Schools					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	~~Greater~~ <u>Similar</u> (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Parks and Recreation					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	~~Greater~~ Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Libraries					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	~~Greater~~ Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

77. Pages V-124 and V-125, Subsection 7, *Environmentally Superior Alternative*, revise Table V-13 (under Utilities and Infrastructure) as follows:

TABLE V-13
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: Above Grade Parking	Alternative 3: Historic Preservation/ Reduced Density	Alternative 4: Historic Preservation/ Existing Zoning
Utilities and Infrastructure					
Water Supply					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant with Mitigation	Less (No Impact)	~~Less Similar~~ (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant)
Wastewater					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	~~Less Similar~~ (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

78. Page V-126, Subsection 7, *Environmentally Superior Alternative*, revise Project Objective No. 1 in Table V-14 as follows:

TABLE V-14
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objective	Project	Ability to Meet Project Goal/Objective			
		Alternative 1 No Project/ No Development	Alternative 2 Above Grade Parking	Alternative 3 Historic Preservation/ Reduced Density	Alternative 4 Historic Preservation/ Existing Zoning
1. Provide a mixed-use development that introduces an array of new residential, office, ~~hotel~~ , and commercial opportunities to the Central City neighborhood.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Substantially Meets Objective (lesser extent than the Project)	Does Not Meet Objective

79. Page V-128, Subsection 7, *Environmentally Superior Alternative*, revise the 2nd sentence of the 1st paragraph following Table V-14 as follows:

~~With the exception of the removal of the hotel use from the scope of the Project, Alternative 3 would provide a similar mix of land uses and publicly-accessible open space as under the Project.~~

80. Page V-129, Subsection 7, *Environmentally Superior Alternative*, revise the last sentence of the 1st partial paragraph as follows:

As also shown in Table V-14, Alternative 4 would only fully meet one of the Project's 10 specific Objectives and would not meet the Project's underlying purpose to redevelop the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, office, retail, ~~hotel~~ and restaurant uses, as well as publicly-accessible open spaces, to revitalize the Project Site and the surrounding neighborhood, promote walkability and use of public transit, and enhance the City's economic base.

20. Chapter VI Other CEQA Considerations

1. Page VI-1 and IV-2, Subsection 1.a)(1)(b), *Operation*, remove the significant and unavoidable operational impacts as follows:

~~(b) — Operation~~

~~(i) — Project-Level~~

~~The analysis of operational air quality impacts analyzed an interim scenario where a portion of the Project Site would be in operation, while a portion of the Project's construction activities would also occur. Thus, with the overlap in operation and construction, emissions were combined as part of this analysis and compared to applicable SCAQMD regional thresholds.~~

~~The Project would result in potentially significant operational impacts due to regional VOC and NO_x emissions above the regional significance thresholds. Mitigation Measures AQ-MM-1 (construction equipment emission reduction features) and AQ-MM-2 (concrete trucks with emission reduction features) would be required to reduce overlapping construction-related NO_x emissions that would be concurrent with the interim regional operational emissions. Mitigation Measure AQ-MM-3 (emergency generator maintenance and testing requirements) would reduce regional VOC and NO_x emissions from operations by scheduling routine maintenance of emergency generators so that only one emergency generator is maintained on any given day. Mitigation Measure AQ-MM-4 would reduce VOC and NO_x emissions from landscaping equipment and Mitigation Measure AQ-MM-5 would reduce VOC emissions associated with coating activities during operations. With implementation of AQ-MM-1 and AQ-MM-2, NO_x emissions would be reduced to below the SCAQMD regional significance threshold from construction~~

~~activities that would overlap with the interim operations of the Project. However, emissions of CO from construction activities that would overlap with the interim operations of the Project would exceed the SCAQMD regional significance threshold due to the Tier 4 Final equipment and CNG truck engine technology, whereby the technology used to reduce NO_x emissions leads to slightly higher CO emissions. This is the result of NO_x being formed through high combustion temperatures whereas CO is formed through incomplete combustion from lower combustion temperatures. CO is a pollutant of lesser air quality concern as compared to NO_x given that the Air Basin is in attainment for CO but is in non-attainment for ozone, with NO_x constituting an ozone precursor emission. Thus, AQ-MM-1 and AQ-MM-2 represent overall environmentally beneficial mitigation measures as they would reduce emissions of an ozone precursor, NO_x, despite increasing emissions of CO during Project construction activities that would be concurrent with the interim regional operational emissions.~~

~~Therefore, while NO_x impacts related to overlapping construction and interim operational emissions would be mitigated to less than significant with implementation of mitigation measures AQ-MM-1, AQ-MM-2 and AQ-MM-3, AQ-MM-4 and AQ-MM-5, CO impacts related to regional emissions during this overlapping short-term timeframe would remain significant and unavoidable after implementation of mitigation measures.~~

~~(ii) — Cumulative~~

~~As the Project's interim operational impacts would be significant and unavoidable, Project CO emissions during the interim scenario where a portion of the Project Site would be in operation, while a portion of the Project would be in construction, combined with emissions from operations of related projects could also exceed the applicable regional CO emissions significance thresholds and would, thus, result in a cumulatively significant and unavoidable impact.~~

2. Pages VI-5, Subsection 1.c)(2), *Off-Site Construction Noise (Cumulative Only)*, revise the 2nd and 3rd paragraphs as follows:

~~For Project-related haul trucks, with implementation of Mitigation Measure NOI-MM-4, Project haul trucks would be prohibited from traveling on Central Avenue between 1st Street and 2nd Street, which would mitigate the Project-level impacts would be to less than significant. However, if the related projects would contribute 31 truck trips per hour or more and travel along the same roadway segments as the Project an additional 130 trips per hour along 1st Street east of Alameda Street, 137 truck trips per hour along Central Avenue between 1st Street and 2nd Street, 122 trips per hour along Central Avenue between 2nd Street and 3rd Street, 171 trips per hour along 4th Street between Hewitt Street and Merrick/Molino Street, and 112 trips per hour along 4th Street between Alameda Street and Hewitt Street (see roadway segments in Table IV.G-10, *Estimate of Off-Site Construction Traffic Noise Impacts*), the combined off-site construction noise from Project haul trucks and related project trucks could exceed the significance threshold.~~

For Project-related foundation concrete pour trucks, ~~there is no feasible mitigation measure that would reduce the Project-level impact to below the significance thresholds. Mitigation Measure NOI-MM-4 would reduce concrete truck trips along the identified segments to less than significant on a project-level.~~ Therefore ~~However~~, related projects contributing any additional truck trips on the same roadway segments at the same time as the Project (see roadway segments in Table IV.G-10) would generate a cumulative noise impact along these same roadway segments.

3. Page VI-6, Subsection 1.c)(3)(a), *Project-Level*, revise the 2nd sentence in the 1st paragraph as follows:

With implementation of Mitigation Measure NOI-MM-~~56~~, potential structural vibration impacts at receptor V3 would be mitigated to a less than significant level.

4. Pages VI-6 and VI-7, Subsection 1.c)(3)(b), *Cumulative*, revise the two paragraphs as follows:

The Project would implement Mitigation Measures NOI-MM-6 and NOI-MM-7 to reduce construction vibration impacts. Implementation of these mitigation measures would reduce impacts to a less-than-significant level, but because implementation of these measures requires the consent of private property owners, which cannot be assured, but not eliminate, the Project's ground~~borne~~-level construction vibration impacts at receptor location V3 ~~but impacts would remain significant and unavoidable.~~

Although it is expected that ~~the related projects~~ Related Project Nos. 9, 18, and 29 listed with identified significant impacts would implement mitigation that would reduce construction structural vibration impacts similar to the Project, overlapping construction activities could result in significant cumulative impacts. Thus, the Project and ~~related projects~~ Related Project Nos. 9, 18, and 29 could together contribute to construction vibration at receptor V3 that may exceed the structural vibration significance threshold. Thus, it is conservatively concluded that the Project's contribution to cumulative construction vibration associated with on-site construction equipment would be cumulatively considerable and would represent a significant and unavoidable cumulative impact.

5. Page VI-8, Subsection 2, *Reasons Why the Project Is Being Proposed, Notwithstanding Significant Unavoidable Impacts*, revise the 1st sentence of the 2nd full paragraph as follows:

The Project would add ~~1,521~~ 1,589 residential units, and consistent with Measure JJJ, between 11 percent and 40 percent of the total units built will be set aside for Very Low-, Low-, or Moderate-income households.

6. Page VI-8, Subsection 2, *Reasons Why the Project Is Being Proposed, Notwithstanding Significant Unavoidable Impacts*, revise 1st three sentences of the 4th full paragraph as follows:

~~In addition, although the air quality analysis identified a significant and unavoidable impact for CO impacts related to regional interim operational and concurrent construction emissions, Project-level net regional operational emissions for full Project operations would be mitigated to below the SCAQMD significance thresholds. Therefore, full Project operational impacts would be mitigated to less than significant. Furthermore, with regard to long-term operational regional emissions, it is expected that many future employees and visitors to the Project likely already live and travel within the Air Basin and therefore already generate mobile-source emissions.~~

7. Page VI-11, Subsection 4, *Growth-Inducing Impacts*, revise 3rd paragraph as follows:

The Project's mix of uses would provide new housing and employment opportunities within a TPA and HQTAs as part of an infill area near existing employment centers and transit options. The Project would include ~~4,524~~ 1,589 residential units, including affordable housing units, to add to the City's current housing stock. The Project would also provide 411,113 square feet of office floor area, ~~and 401,088~~ 145,748 square feet of restaurant/retail floor area, ~~and a 68-room hotel~~. As the Project Site is currently developed with warehouse and wholesale commercial buildings and associated office space, truck loading docks, and surface parking, the Project would provide the area with new residential, ~~hotel~~, office retail/restaurant uses. The Project's multiple uses would support a net estimated ~~4,975~~ 2,073 jobs that would be available to residents of the surrounding neighborhoods. The Project also proposes 90,113 square feet of publicly accessible open space including parks, paseos, outdoor cafes, and trees and other landscaping.

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