II. RESPONSES TO COMMENTS

1. Introduction

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and Section 15088(a) of the California Environmental Quality Act (CEQA) Guidelines govern the lead agency's requirement to respond to comments provided on a Draft EIR. Section 15088(a) of the CEQA Guidelines states that "[t]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments raising significant environmental issues that were received during the noticed comment period and any extensions and may respond to late comments." In accordance with these requirements, this section provides responses to each of the written comments received regarding the Draft EIR.

Table II-1, *Comments Received in Response to the Draft EIR*, summarizes the environmental issues raised by each commenter regarding the Draft EIR. Section II, *Responses to Comments*, provides the City's responses to each of the written comments raised in the comment letters received on the Draft EIR. As indicated in Table II-1, the comment letters are organized by agencies (AG), organizations (ORG), and individuals (IND). Copies of the original comment letters are provided in Appendix FEIR-A, Original Draft EIR Comment Letters, of this Final EIR.

As required by CEQA Guidelines Section 15088(c), the focus of the responses to comments is "the disposition of significant environmental issues raised." Therefore, detailed responses are not provided to comments that do not relate to environmental issues. However, in some cases, additional information has been added for reference and clarification.

TABLE II-1
MATRIX OF COMMENTS RECEIVED ON THE DRAFT EIR

		Date Received	Project Description	Aesthetics	Air Quality	Cultural Resources	Greenhouse Gas Emissions	Hazardous Materials	Land Use and Planning	Noise	Population/Housing	Public Services	Transportation	Utilities	Other (e.g., displacement, gentrification)	Support	Extension Request
Agencies																	
AG 1A-1B	Council District 14 Gerald Gubatan	November 7 & November 16, 2023															X
AG 2	City of Los Angeles Department of Public Works Albert C. Lew, P.E., C.S.P. Wastewater Engineering Services Division (WESD) Bureau of Sanitation	November 14, 2023													X		
AG 3A-3B	CA Dept. of Transportation (Caltrans) - District 7 Alan Lin, P.E., Transportation Engineer Local Development Review (LDR) Branch, Division of Planning Mail Station 16 100 South Main Street Los Angeles, CA 90012	November 16, 2023											X				X

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AG 4A-4B	South Coast Air Quality Management District Evelyn Aguilar, Air Quality Specialist, CEQA-IGR Sam Wang, Program Supervisor, CEQA-IGR 21865 Copley Drive Diamond Bar, CA 91765	November 16 & November 28, 2023			X		X										
AG 5	Los Angeles County Metropolitan Transportation Authority Cassie Truong, Senior Transportation Planner Development Review Team Transit Oriented Communities	November 27, 2023											X				
Organizations																	
ORG 1A-1B	Little Tokyo Service Center Grant, Sunoo 231 E Third Street, G-106 Los Angeles, CA 90013	October 25, December 11, and December 12, 2023	X	X	X	X	X			X	X	X	X		X		X
ORG 2A-2B	Little Tokyo Community Council Kristin Fukushima, Managing Director	November 3 and November 6, 2023 December 8, 2023	X	X	X	X	X		X	X	X	X	X		X		X

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ORG 3	For Skid Row Now & 2040 Henriette Brouwers	November 9, 2023															X
ORG 4	Riverside Neighbors Opposing Warehouses Mike McCarthy	November 26, 2023			X		X								X		
ORG 5	Para Los Niños Dan Nieman, Vice President, External Affairs	November 28, 2023														X	
ORG 6	Los Angeles/Orange Counties Building Trades Council Ernesto Medrano, Executive Secretary 1626 Beverly Blvd. Los Angeles, CA 90026	December 4, 2023														X	
ORG 7	Los Angeles Conservancy Adrian Scott Fine, Senior Director of Advocacy 1626 Beverly Blvd. Los Angeles, CA 90026	December 7, 2023				X											
ORG 8	Nikkei for Civil Rights and Redress Kathy Masaoka, Co-Chair	December 11, 2023	X	X	X	X			X	X	X	X	X		X		X

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ORG 9	Little Tokyo Business Association David Ikegami, President 250 E. First Street, #201 Los Angeles, CA 90012	December 11, 2023														X	
ORG 10	Japanese American National Museum Ann Burroughs, President and CEO 100 North Central Avenue Los Angeles, CA 90012	December 11, 2023	X	X	X	X	X		X	X	X	X	X		X		X
ORG 11	J-Town Action and Solidarity Gianna Furumoto, JAS Organizer	December 11, 2023	X								X	X			X		X
ORG 12	Los Angeles Poverty Department Henriette Brouwers, Associate Director	December 11, 2023	X	X	X	X			X	X	X	X	X		X		X
ORG 13	Japanese American Cultural and Community Center Patricia Wyatt, CEO 244 S. San Pedro St. Los Angeles, CA 90012	December 11, 2023	X	X	X	X	X		X	X	X	X	X		X		X

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ORG 14	United Coalition East Prevention Project Charles Porter, Project Coordinator 804 E. 6''' Street Los Angeles, CA 90021	December 11, 2023	X	X	X				X	X	X		X		X		X
Individuals																	
IND 1	Mark Masaoka 3060 St. George Street Los Angeles, 90027	October 24,2023													X		
IND 2	Hattie H. Bradshaw 72 Cactus Street Riverside, CA 92509	November 7,2023					X										
IND 3	David Ranusch 618 E. 4th St., #8 Los Angeles, CA 90013	November 5, 2023			X			X				X		X			
IND 4 (A-C)	Jeff Liu	November 9, 2023, November 14, 2023, November 30, 2023, & December 11, 2023	X	X		X	X	X		X		X	X	X	X		
IND 5	Sarah Fukui	November 16, 2023		X		X											X

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IND 6	Kaz Matamura	November 16, 2023		X		X											X
IND 7	Joy Yamaguchi	November 16, 2023		X		X											X
IND 8	Andie Kimura	November 16, 2023		X		X							X				X
IND 9	Edward Escarsega	November 17, 2023		X		X											X
IND 10	Alain Vincent Pastor 448 S. Hill Street, Suite #815 Los Angeles, CA 90013	November 20, 2023													X		
IND 11	Mike Callhan	November 20, 2023	X			X											
IND 12	Christine Hikido	November 21, 2023		X		X											X
IND 13	David Solomon	November 21, 2023														X	
IND 14	Sergio Moreno 720 East 7th St. Los Angeles, CA 90021	November 21, 2023														X	
IND 15	Ernie Doizaki	November 21, 2023														X	
IND 16	Cindy Lin and Gabriel McCormick	November 22, 2023		X		X											X
IND 17	Stephanie Caridad	November 22, 2023		X		X											X
IND 18	Sheryl Quock	November 25, 2023		X		X											X

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IND 19	George Lu	November 26, 2023 & December 8, 2023			X		X										
IND 20	Sam Nakahira	November 26, 2023		X		X						X			X		X
IND 21	Eri Yamagata	November 27, 2023		X		X									X		X
IND 22	Kim Cooper and Richard Schave	November 27, 2023				X											
IND 23	Mark Shinbane	November 28, 2023														X	
IND 24	Eddie Isaacs	November 29, 2023														X	
IND 25	Matt Klein	December 1, 2023														X	
IND 26	Nancy Kurihara-Johnson	December 5, 2023 & December 8, 2023	X	X	X	X		X		X			X		X		
IND 27	Lisa Spencer 1819 W. Charlie Sifford Drive Los Angeles, CA 90047	December 7, 2023													X		
IND 28	Sara Daleiden	December 7, 2023	X	X	X	X				X			X		X		
IND 29	Dina Furumoto	December 7, 2023		X	X	X				X			X		X		
IND 30	Celeste Shimoura Goedert	December 7, 2023		X	X	X				X			X		X		
IND 31	Justin Kawaguchi	December 8, 2023		X	X	X				X			X		X		
IND 32	Scott Oshima	December 11, 2023		X	X	X				X			X		X		

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IND 33	David Ikeda	December 8, 2023		X		X				X		X	X		X		
IND 34	Yukio Kawaratani	December 9, 2023	X	X		X			X						X		
IND 35	Avalon Igawa	December 9, 2023		X	X	X				X			X		X		
IND 36	Alex Kanegawa	December 9, 2023		X	X	X				X			X		X		
IND 37	Pranay Reddy	December 9, 2023		X	X	X				X			X		X		
IND 38	Alex Hager	December 10, 2023														X	
IND 39	Junko Yamauchi	December 10, 2023		X	X	X				X			X		X		
IND 40	Mariko Rooks	December 10, 2023		X	X	X				X			X	X	X		
IND 41	Dante Scott	December 10, 2023														X	
IND 42	Maria Ahverdyan	December 10, 2023		X	X	X				X			X		X		
IND 43	Irene Ota	December 10, 2023	X		X	X		X		X			X	X	X		
IND 44	Rickie Dean	December 11, 2023		X	X	X				X			X		X		
IND 45	Susan Kashiwabara	December 11, 2023		X	X	X				X			X		X		
IND 46	Allison Kamiya	December 11, 2023		X	X	X				X			X		X		
IND 47	Szi Kiat Lee	December 11, 2023														X	
IND 48	Kathy Masaoka	December 11, 2023		X	X	X				X			X		X		
IND 49	Eric Chu	December 11, 2023														X	

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IND 50	Midori Tachibana	December 11, 2023	X	X	X	X				X			X		X		
IND 51	Ted Oyama	December 11, 2023		X									X		X		
IND 52	Steve Nakasone	December 11, 2023		X	X	X				X			X		X		
IND 53	Shin Ito	December 11, 2023		X	X	X				X			X		X		
IND 54	Trish Nicholson	December 11, 2023		X	X	X				X			X		X		
IND 55	Andie Kimura	December 11, 2023		X	X	X	X			X			X		X		
IND 56	Grace Yamashiro	December 11, 2023		X	X	X				X			X		X		
IND 57	Leslie Andrew Ridings	December 11, 2023														X	
IND 58	Francis Cullado Visual Communications Media 120 Judge John Aiso St. Los Angeles, CA 90012	December 11, 2023	X	X	X	X				X			X		X		X
IND 59	Jacob Paris	December 11, 2023														X	
IND 60	Tom Grode	December 11, 2023													X		
IND 61	Kathy K. Pham	December 11, 2023		X	X	X				X			X		X		

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IND 62 (A-C)	Mitchell Matsumura (Form Letter) Linda Yamada Elaine Takahashi KP Kuo Enzo Perez Matthew Hom Suzanne Isaego Bethany Ahlberg Richard Kato Erika Espinoza Tamyke Edwards Julian Mendieta Miho Murai Lin Nakashima Ron Frank Tonya Jaynes Tyler Karasawa Barbara Hertz Jimmy Rivera Sei Nakashima Kimika Nakashima	December 11, 2023		X	X	X				X			X		X		

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	Eric Sham Meika Best Juniper Wong Daniel Omectin T. Drompoole Salsabil Tany Ling Katherine Ward Sky Bird Fernanda Sanchez Pamela Agustin Hayk Makhmuryan Mantle Nam Anthony Chua Crystal Baranyk Donna Maeda Sandy Lee Joyce Valenzuela John Urjuin Mariko Bird																

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IND 63	Yasue Katsuragi	December 11, 2023		X	X	X				X			X		X		
IND 64	Kimi Maru	December 11, 2023	X	X											X		
IND 65	Annika Tamaki and Charlene Tonai Din	December 11, 2023		X	X	X				X			X		X		
IND 66	Jeanette Fantone	December 11, 2023		X	X	X				X			X		X		
IND 67	Mickie Okamoto	December 11, 2023		X	X	X				X			X		X		
IND 68	Emiko Kranz	December 11, 2023		X	X	X				X			X		X		
IND 69	Isaiah Sherman	December 11, 2023														X	
IND 70	Carol Zou	December 11, 2023		X	X	X				X			X		X		
IND 71	Yuji Kawana	December 11, 2023														X	
IND 72	Philip, Akira and Jo Ann Hirose	December 11, 2023		X	X	X				X			X		X		
IND 73	Ana Iwataki	December 11, 2023		X	X	X				X			X		X		
IND 74	Mayuki Nagamine	December 11, 2023		X	X	X				X			X		X		
IND 75	Bishop Noriaki Ito	December 11, 2023		X	X	X				X			X		X		
IND 76	Kathleen Yamamoto	December 11, 2023		X	X	X				X			X		X		
IND 77	Mark Masaoka	December 11, 2023	X		X	X				X			X		X		
IND 78	Ichiro Mike Murase	December 11, 2023		X	X	X				X			X		X		
IND 79	Kevin Onishi	December 11, 2023		X	X	X				X			X		X		

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IND 80	Sarah Eunyoung Kim	December 11, 2023		X	X	X				X			X		X		
IND 81	Jean Kawakami	December 11, 2023		X	X	X				X			X		X		
IND 82	Michelle Hirano	December 11, 2023		X	X	X				X			X		X		
IND 83	Don Tahara	December 11, 2023		X									X		X		
IND 84	Cindy Lin and Gabriel McCormick	December 11, 2023													X		X
IND 85	David Ikegami	December 11, 2023														X	
IND 86	Traci Kato-Kiriyama	December 11, 2023		X	X	X				X			X		X		
IND 87	Nancy Uyemura	December 11, 2023		X	X	X				X			X		X		
IND 88	Nicole Oshima	December 11, 2023		X	X	X				X			X		X		
IND 89	Andrea Taylor	December 11, 2023	X	X		X					X		X	X	X		

2. Responses to Comments

Comment Letter No. AG 1A

Council District 14
Gerald Gubatan
Received November 7, 2023

Comment No. AG 1A-1

Hello Tamar - Gerald Gubatan here with CD14. Our office has been copied on various messages regarding public comment in the environmental document as referenced above.

I'd like to learn more about the status of this matter - May I find time on your calendar to discuss further?

Response to Comment No. AG 1A-1

This comment provides an inquiry with the Department of City Planning to discuss the public comment on the Draft EIR. City staff responded to this inquiry with available times for a meeting. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment Letter No. AG 1B

Council District 14
Gerald Gubatan
Received November 16, 2023

Comment No. AG 1B-1

On behalf of Council District 14, I am contacting your office to advise that our office has been copied on a communication from various community stakeholders to the Department of City Planning requesting a time extension on the public comment period related to the above-referenced Draft EIR.

Representatives of several longstanding community institutions serving Little Tokyo in Council District 14 have stated that the estimated 1,000-page environmental document would be difficult to access and comprehend by monolingual Japanese, Korean and Spanish-speaking constituents who reside in the Little Tokyo community. A non-profit organization concedes it does not have the technical capacity to translate the document written in English into these respective languages but has the ability to offer translation services as needed.

In addition, organizational leaders have made reference to the upcoming holiday season which could impact the ability of constituents to provide meaningful public comment in a timely manner.

We understand that the public comment period ends on November 27, 2023, representing a roughly 45-day period.

Our office would not object to a reasonable time extension to allow for meaningful public comment from Little Tokyo community stakeholders in light of the concerns noted above.

Response to Comment No. AG 1B-1

This comment acknowledges that additional time for review of the Draft EIR would be reasonable given the length of the Draft EIR, the length of time needed to provide translation services in the Little Tokyo Community, and the inclusion of a holiday within the Draft EIR comment period. The comment requests that the City extend the Project's 47-day public review period to a reasonable time extension to allow for meaningful public comment from Little Tokyo community stakeholders in light of the concerns noted above. CEQA Guidelines Section 15105(a) states: "The public review period for a draft EIR shall not be less than 30 days nor should it be longer than 60 days except under unusual circumstances. When a draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 45 days, unless a shorter period, not less than 30 days, is approved by the State Clearinghouse." The Draft EIR was originally circulated for public review from October 12, 2023 to November 27, 2023 for a total of 47 days, thus, complying with the 45-day minimum comment period.

A Notice of Extension extending the public comment review period to December 11, 2023 was prepared by the City and distributed in a similar manner as the Notice of Completion and Availability (NOCA) of the Draft EIR to the same agencies and interested parties. The extended public review period further exceeded the 45-day minimum CEQA-required timeframe.

Comment Letter No. AG 2

City of Los Angeles Department of Public Works
Albert C. Lew, P.E., C.S.P.
Wastewater Engineering Services Division (WESD) Bureau of Sanitation
Received November 14, 2023

Comment No. AG 2-1

Please find attached the official response. Contact us if you have any questions.

Response to Comment No. AG 2-1

This comment references an attached letter (Inter-Department Correspondence) dated October 30, 2023 from Rowena Lau, Division Manager, Wastewater Engineering Services Division, LA Sanitation and Environment (LASAN) to the Department of City Planning. The content of the letter is provided in Comment No. AG 2-2. See Response to Comment No. AG 2-2 for a response to the comments raised in this letter.

Comment No. AG 2-2

This is in response to your October 12, 2023 Notice of Completion and Availability of Draft Environmental Impact Report for the proposed mixed-use located at 715 & 730 East 4th Street, 364, 400-464, and 427-433 S Central Ave, Los Angeles, CA 90013. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review it has been determined that the project is in the final stages of the California Environmental Quality Act review process and requires no additional hydraulic analysis. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Than Win at (323) 342-6268 or email at than.win@lacity.org.

Response to Comment No. AG 2-2

This comment indicates that no additional hydraulic analysis is necessary for submittal to LASAN. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment Letter No. AG 3A

CA Dept. of Transportation (Caltrans) - District 7
Alan Lin, P.E., Transportation Engineer
Local Development Review (LDR) Branch, Division of Planning
Mail Station 16
100 South Main Street Los Angeles, CA 90012
Received November 16, 2023

Comment No. AG 3A-1

This is a large project to review. Would it be possible for Caltrans to obtain an extension to 12/4/23?

Response to Comment No. AG 3A-1

This comment requests an extension of the Draft EIR public review period to December 4, 2023. The original public review comment period was extended to end on December 11, 2023. As such, the 61-day public review comment period exceeded the minimum 45-day review period required by CEQA Guidelines Section 15105(a) for Draft EIRs submitted to the State Clearinghouse for public review by state agencies. The Project's public review period also exceeded the maximum review period duration of 60 days per Section 15105(a), with such exceedances only permitted when there are unusual circumstances. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter dated November 16, 2023, for further discussion of the Project's Draft EIR comment period extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines.

Comment Letter No. AG 3B

California Department of Transportation (Caltrans)
Francis Duong, Acting Branch Chief
Local Development Review (LDR) Branch
Division of Transportation Planning, Goods Movement and Local Assistance
Mail Station #16
100 South Main Street, Los Angeles, CA 90012
Received December 11, 2023

Comment No. AG 3B-1

I'm sending on behalf of Mr. Alan Lin, he is the Caltrans LDR coordinator for this project. Please find in attachment for Caltrans DEIR review comments for the Fourth & Central / Fourth and Central Project. I've also cc: QPR and Mr. Alan Lin.

Response to Comment No. AG 3B-1

This comment references an attached letter from Frances Duong, Acting LDR/CEQA Branch Chief, with Caltrans to the Department of City Planning. The content of the letter is provided in Comment Nos. AG 3B-2 to AG 3B-14. See Response to Comment Nos. AG 3B-2 to 3B-14 for responses to the comments raised in this letter.

Comment No. AG 3B-2

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Project would demolish the existing surface parking and cold storage facility uses on the West and South Sites. The Project intends to adaptively reuse a portion of a six-story cold storage warehouse building located on the North Site, while demolishing the remaining attached single-story warehouse building on the North Site.

The Project would include a mix of residential, office, 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 residential units, including affordable housing units, totaling 1,731,849 sf; 411,113 sf of office uses; 101,088 sf of restaurant/retail uses1 [sic]; and 68 hotel rooms (74,484 sf of hotel floor area). The Project would include 163,325 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 2 to 44 stories, with a maximum height of 497 feet. The Project would provide 2,475 vehicle parking spaces within subterranean parking (up to four levels). The Project would also provide 146 short-term bicycle parking spaces and 596 long-term bicycle parking spaces.

Response to Comment No. AG 3B-2

This introductory comment provides an overview of the Project and does not raise an issue with the Draft EIR. Please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes the design modifications made to the Project in response to public and agency comments received on the Draft EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories, while increasing the height of Building 6 (on the South Site) from six stories to 26 stories, and to reduce the residential density/unit count in Building 2 from 449 units to 335 units, a reduction of 114 units. Additionally, the hotel component (68 rooms) in Building 6 has been removed. With the conversion of the 68 hotel rooms to residential units, as well as the transfer of 114 units from Building 2 to Building 6, the residential unit count in Building 6 has increased from 68 units to 250 units. Overall, the Project's unit count has been increased from 1,521 units to 1,589 units. Also, the amount of restaurant and retail space within Building 1 has been increased from 16,378 square feet to 61,038 square feet. As such, the Project's overall amount of restaurant/retail square footage has been increased from 101,088 square feet to 145,748 square feet.[1] Within Building 1, the 44,660 square feet of residential floor area (which was previously designated for residential amenity space) would be removed to accommodate the increase in restaurant and retail square footage. With these modifications, the Project's overall floor area (2,318,534 square feet) would remain the same as analyzed in the Draft EIR. The Project's total parking count has also been reduced from 2,475 spaces to 2,444 spaces. Relevant figures from the Draft EIR have also been revised to illustrate the Project design modifications summarized above. As the comment does not discuss the adequacy or content of the Draft EIR, no further response is necessary.

Comment No. AG 3B-3

Caltrans is aware of the challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal

[1] 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 Project's retail/restaurant uses, the environmental analyses included in Chapter IV, *Environmental Impact Analysis*, of the Draft EIR, evaluates a total of 158,225 square feet of restaurant/retail uses. It is assumed that there would be 67,595 square feet of retail uses and 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas (GHG) emissions.

Response to Comment No. AG 3B-3

The comment discusses the challenges in identifying viable solutions to alleviating congestion on state and local facilities and recommends the incorporation of multi-modal and complete streets transportation elements, including pedestrian safety.

The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 3B-4

Mobility Plan

Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. The Mobility Plan combines “complete street” principles as evaluated in detail in with the following five goals:

1. Safety First

2. World Class Infrastructure

3. Access for all Angelenos

4. Collaboration, Communication, and Informed Choices

5. Clean Environments and Healthy Communities.

The Project would provide a 6-foot dedication along the 4th Street ROW and a 5-foot center line adjustment (a total of 11 feet) to meet the Mobility Plan’s 86-foot standard for Avenue II ROW and 28-foot street width. The Project would provide a 10-foot dedication along the Alameda Street ROW to meet the Mobility Plan’s 50.5-foot standard for Avenue I ROW and 35-foot street width. Overall, the Project would promote active transportation modes and would not conflict with any of the applicable goals, policies or programs in Mobility Plan 2035 adopted to protect the environment.

Response to Comment No. AG 3B-4

The comment indicates that Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. This comment notes that the Project would promote active transportation modes and would not conflict with any of the applicable goals, policies or programs in Mobility Plan 2035 adopted to protect the environment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 3B-5

Transit

The Project Site is located within a Transit Priority Area (TPA). The Project Site is located approximately 0.40 miles south of the underground-level Metro L Line (formerly Gold Line) Little Tokyo/Arts District Station at Central Avenue & 1st Street. The Project is located adjacent to numerous bus stops including Metro 18, 30, 53, 60, 62, 720, LADOT Dash A, Montebello Bus Line M40, and Metro Rail L.

Response to Comment No. AG 3B-5

The comment states that the Project Site is located within a TPA and various available transit options in the local Project vicinity. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 3B-6

Bicycle

In the vicinity of the Project Site, existing bicycle lanes are provided on 3rd Street between San Pedro Street and Santa Fe Avenue, 5th Street west of Central Avenue, and Mateo Street between Santa Fe Avenue and 6th Street. 1st Street and 2nd Street west of Santa Fe Avenue have been designated as bicycle routes. The Project would provide short-term and long-term bicycle parking throughout the Project Site that would support “first-mile, last-mile solutions” and enhance the multi-modal connectivity and access for transit riders. Again, the Project would also provide 146 short-term bicycle parking spaces and 596 long-term bicycle parking spaces.

Response to Comment No. AG 3B-6

The comment identifies bicycle facilities in the Project vicinity. The comment states with its proposed bicycle parking, the Project would support “first- mile, last-mile solutions” and enhance the multi-modal connectivity and access for transit riders. The comment is noted

for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 3B-7

Pedestrian

The Project would enhance pedestrian access within and around the Project Site by providing improvements to the sidewalks, landscaping, and pedestrian safety measures within the Project and along the Project frontages. The signalized intersections surrounding the Project Site provide pedestrian phasing, continental crosswalk striping, and Americans with Disabilities Act (ADA) accessible ramps. The Project would prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities with separate pedestrian and vehicle access points and active street frontages. LADOT recommends the project consider the installation of a pedestrian mid-block crossing signal on 4th Street between Alameda Street and Merrick Street to improve pedestrian access in the area if the pedestrian signal is warranted.

Response to Comment No. AG 3B-7

The comment identifies Project features that would enhance pedestrian access in and around the Project Site. The comment also states that LADOT recommends the Project consider the installation of a pedestrian mid-block crossing signal on 4th Street between Alameda Street and Merrick Street to improve pedestrian access in the area if the pedestrian signal is warranted. Consistent with this comment, the Project Applicant will work with LADOT to further explore the need for a pedestrian mid-block crossing signal on 4th Street between Alameda Street and Merrick Street, and will determine if the pedestrian signal is warranted based on applicable City standards and requirements.

Comment No. AG 3B-8

VMT

The project proposes to incorporate the TDM strategies of reduced parking supply, parking cash-out, bicycle share station, and bike parking per LAMC. With the application of these TDM measures, the proposed project is projected to have a Household VMT of 3.9 and a Work VMT of 6.5 which is lower than the thresholds of Household VMT per Capita 6.0 and Work VMT per Employee 7.6. Therefore, it is concluded that implementation of the proposed project would not result in a significant VMT impact.

These TDM measures should be part of the project description or development agreement between the developer and the Lead Agency based on page IV.J-25 of the

DEIR, "the VMT Calculator measures the reduction in VMT resulting from a project's incorporation of TDM strategies as project design features or mitigation measures." Otherwise, there should be VMT disclosures before and after TDM measure implementation.

Response to Comment No. AG 3B-8

This comment presents the Project's VMT outputs as discussed on page IV.J-35, in Section IV.J, *Transportation*, of the Draft EIR. As stated on page II-51, of Chapter II, *Project Description*, in the Draft EIR, "A transportation demand management (TDM) program would be implemented to reduce the Project's single occupant vehicle trips and increase the trips arriving via alternative modes of transportation (e.g., walking, bicycle, carpool, vanpool, and transit). The TDM program would include design features, transportation services, education, and incentives intended to reduce the amount of single occupant vehicles during commuter peak hours." Page IV.J-35 lists the four TDM measures related to reduced parking supply, parking cash-out, bicycle share station, and bicycle parking per LAMC that are incorporated into the Project design and required by the City's current TDM Ordinance. As stated on Page IV.J-35, "Should implementation of the selected TDM measures become infeasible for the Project, substitute TDM measures would be implemented that would be equivalent or superior in reducing vehicle trips and VMT." Thus, pursuant to applicable regulatory requirements, the Project will be required to implement TDMs per LAMC Section 12.26 J, the TDM Ordinance, and, therefore, a PDF is not required. Moreover, as the Project would not have a significant impact related to VMT, no mitigation measure is required. The Project's final list of TDMs will be subject to review and approval by LADOT to ensure consistency and compliance with the City's TDM Ordinance.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications. Applicable updates to the CEQA transportation analysis for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications will not result in any significant new or substantially increased impacts.

Comment No. AG 3B-9

TDM

The project proposed the following TDM program to implement:

- Reduced Vehicle Parking Supply – The Project would provide less on-site vehicle parking than the amount required by the direct application of LAMC parking rates, without consideration of allowable parking reduction mechanisms. A

reduced parking supply makes parking less available and, therefore, encourages the use of non-automobile modes to and from the Project Site and reduces VMT.

- Bicycle Parking in Accordance with LAMC requirements – The project would provide bicycle parking spaces in compliance with the requirements of the LAMC.
- Parking Cash-Out Program – The Project would comply with the state parking cash-out law, which requires employers who provide subsidized parking to offer employees a cash allowance in lieu of a parking space.
- Bicycle Share Station – The Project would also provide a bicycle share station in order to support first-mile/last-mile service for transit users and reduce reliance on personal automobiles.
- Record a Covenant and Agreement to ensure that the TDM program will be maintained.
- Contribute a one-time fixed fee contribution of $150,000 to be deposited into the City's Bicycle Plan Trust fund to implement bicycle improvements in the vicinity of the project.
- Contribute a one-time fixed fee contribution of $75,000 to be deposited into the City's Mobility Trust fund to implement improvements in the vicinity of the project.

In addition to the proposed TDM, we encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). This reference is available online at:

http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf

Response to Comment No. AG 3B-9

This comment presents the Project's TDM program and suggests evaluating the potential for additional TDM strategies for the Project based on the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The comment identifies strategies that may be included in the Project's TDM Program to promote non-automobile travel. During preparation of the Draft EIR, the City considered a range of TDM and ITS measures and included those which the City determined to be feasible and applicable to the Project. Further, since the Draft EIR determined that the Project would result in less-than-significant VMT impacts, additional TDM strategies are not warranted for the Project. As

the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 3B-10

Freeway Safety Analysis

Based on the Project's trip generation estimates and traffic distribution pattern, the following off-ramps were analyzed

- US 101 Northbound Off-Ramp to 4th Street
- US 101 Southbound Off-ramp to Los Angeles Street
- I-5 Northbound Off-Ramp to 7th Street
- I-5 Southbound Off-Ramp to 4th Street
- I-10 Eastbound Off-ramp to Central Avenue
- I-10 Eastbound Off-ramp to Alameda Street

Based on the City's guidelines under Future with Project Conditions, the queues at off-ramps would not exceed the ramp storage length during any of the analyzed peak hours and would not cause a significant safety constraint. However, for the off-ramp at US-101 and North at 4th Street, the Future with Project conditions is 733 feet which is very close to the ramp storage length of 820 feet. This is less than 4 vehicle lengths (25 feet/vehicle) away to trigger a safety constraint. We would like the Lead Agency to be aware of this issue and be prepared to work with Caltrans in the future to avoid this traffic safety concern.

Response to Comment No. AG 3B-10

This comment summarizes the freeway safety analysis that was conducted for the six freeway off ramps described on pages IV.J-37 – IV.J-38 of Section IV.J, *Transportation*, of the Draft EIR. This commenter's concern that the remaining vehicle ramp storage of the US-101 Northbound off-ramp to 4th Street under the Future with Project conditions is close to triggering a safety constraint is acknowledged by the City. The City is prepared to work with Caltrans in the future to address this traffic safety concern, as appropriate.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications. Applicable updates to the CEQA transportation analysis for the Project with design modifications are included in Section III, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Comment No. AG 3B-11

Others

On page IV.J-35 of the DEIR states “Should implementation of the selected TDM measures become infeasible for the project, substitute TDM measures would be implemented that would be equivalent or superior in reducing vehicle trips and VMT.” This statement should be part of the development agreement and the Lead Agency should be aware that No TDM measures will guarantee desired/actual Project VMT.

In order for the Lead Agency to determine if the TDM is feasible and the Project VMT is within thresholds for this large project in Downtown Los Angeles, a post-development VMT analysis to validate and justify Project VMT and future VMT threshold setting should be prepared. Additional mitigation measures should be implemented when the post-development VMT analysis discloses any traffic significant impact. This analysis, which may include interviews with and surveys of project occupants, will provide new traffic data to help validate the City’s VMT traffic model results.

The collected data can include, among other things, where the trips are coming from, when the trips are taking place, what transportation mode is used, and why those transportation modes were selected. This survey data would be useful 1) to validate existing VMT threshold, 2) to assist in setting future VMT threshold, and 3) to identify suitable TDM to apply as minimization or mitigation measures for the future. These measures could be implemented in the event the post-development VMT analysis discloses any significant traffic impacts.

Response to Comment No. AG 3B-11

This comment states that a post-development VMT analysis should be conducted to ensure the Project’s TDM measures are feasible and validate the Project’s VMT traffic modeling results. The City, as the Lead Agency, has the discretion to select the appropriate methodologies and thresholds of significance for evaluating a project’s VMT, as detailed in CEQA Guidelines Sections 15064.3 and 15064.7, respectively. The Project was evaluated for potential VMT impacts based on the adopted guidelines of the City of Los Angeles, the Lead Agency. Consistent with the Office of Planning and Research (OPR) Technical Advisory, the City developed a methodology to analyze impacts and adopted its own thresholds, which are supported by substantial evidence as documented in the VMT Calculator Documentation. According to CEQA Guidelines Section 15384(a), substantial evidence means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion even though other conclusions might also be reached. Based on the City’s significance thresholds and guidelines, the Project would not result in a significant VMT-related impact, and no further analysis or mitigation measures would be required, including, without limitation, post-development review.

Additionally, the comment asserts that the City should be aware that no TDM measures can assure VMT results. While this is not a comment on the adequacy of the Draft EIR, the commenter is referred to page IV.J-25 of the Draft EIR, which explains that TDM reductions for the Project were applied according to the guidance found in the City's VMT Calculator Documentation and the TDM Strategies Appendix, which have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT.

Comment No. AG 3B-12

Any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods. Any debris on the construction truck must be covered by a tarpaulin cover.

Response to Comment No. AG 3B-12

This comment regarding a Caltrans transportation permit for oversized trucks, recommendation for large-size truck trips be limited to off-peak commute periods, and use of tarpaulin covers for covering debris on construction trucks is noted. Any oversized-transport vehicles utilizing state highways during construction of the Project will obtain a transportation permit as required by Caltrans. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 3B-13

Due to the recent I-10 bridge fire on Caltrans facilities, bridge column repairs are still ongoing. Some of the streets connecting to Alameda Street on/off-ramp are temporary restripe [sic] to one-way (14th Street). Caltrans recommends that trucks hauling building materials or dirt to/from the project site avoid using Alameda Street to access I-10. The revised duration for the structure columns repair is unknown at this time.

Response to Comment No. AG 3B-13

This comment recommends trucks hauling building materials or dirt to or from the Project Site to avoid using Alameda Street to access I-10. The City will continue to monitor progress on the bridge repairs and will identify appropriate route(s) in consideration of the repairs as part of the Project's Construction Management Plan, which is included as Project Design Feature TRAF-PDF-1 in Section IV.J, *Transportation*, of the Draft EIR.

Comment No. AG 3B-14

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2022-04342-DEIR.

Response to Comment No. AG 3B-14

The comment provides Caltrans contact information in the event additional information is needed and is noted by the Department of City Planning for the administrative record. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment Letter No. AG 4A

South Coast Air Quality Management District
Evelyn Aguilar, Air Quality Specialist, CEQA-IGR
Received November 16, 2023

Comment No. AG 4A-1

I just received your voicemail. Sorry I was not able to pick up earlier. Thank you so much for the information on the current equipment at the site; much appreciated.

Response to Comment No. AG 4A-1

This comment provides a response to a telephone inquiry to the Department of City Planning regarding current equipment at the Project Site. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment Letter No. AG 4B

South Coast Air Quality Management District
Sam Wang, Program Supervisor, CEQA-IGR
Planning, Rule Development & Implementation
21865 Copley Drive
Diamond Bar, CA 91765
Received November 28, 2023

Comment No. AG 4B-1

Attached are South Coast AQMD staff's comments on Draft EIR for Fourth & Central Project (ENV-2021-4071-EIR) (SCH No. 2022030295) (South Coast AQMD Control Number: LAC231012-02). Please contact me if you have any questions regarding these comments.

Response to Comment No. AG 4B-1

This comment references an attached letter from the South Coast Air Quality Management District (SCAQMD) dated November 27, 2023 from Sam Wang, Program Supervisor, CEQA IGR Planning, Rule Development & Implementation to the Department of City Planning. The content of the letter is provided in Comment Nos. AG 4B-2 to AG 4B-12. See Response to Comment Nos. AG 4B-2 to AG 4B-12 for responses to the comments raised in this letter.

Comment No. AG 4B-2

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The City of Los Angeles (City) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comment.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of construction and operation of a high-density mixed-use development totaling 2,318,534 square feet (sq ft) on 7.6 acres spread across 10 buildings.[1] Buildings will range in size from two to 44 stories.[2] The construction phase of the Proposed Project will also entail demolishing an existing cold storage warehouse currently operating at the Proposed Project site.[3] Specifically for the operation phase, at full buildout, the Proposed Project will be comprised of 1,521 dwelling units, 411,113 sq ft of office uses, 101,088 sq ft of restaurant/retail uses, a 68-room hotel, and subterranean parking.[4] In terms of air emission sources, the Draft EIR states that the Proposed Project's operation phase may include, among others, the following stationary sources of emissions: six emergency generators ranging from approximately 2,000 to 3,350 horsepower, restaurant charbroilers, and on-site cooling towers.[5] The operation

phase of the Proposed Project is also expected to generate mobile sources from a net increase of 13,724 daily vehicle trips.[6] The Proposed Project is generally located on three distinct sites (referred to in the Draft EIR as North, South and West sites[7]) near the southeast corner of East 4th Street and South Central Avenue in the downtown area of the City of Los Angeles, Los Angeles County.[8] The nearest sensitive receptor (multi-family residential uses) is approximately 120 feet west from the West site of the Proposed Project.[9] Construction is projected to commence in 2025, occur over several phases, and last approximately five years.[10]

1 Draft EIR. Executive Summary. Pages ES-1 through ES-2.
2 Ibid. Executive Summary. Page ES-2.
3 Ibid. Executive Summary. Page ES-1.
4 Ibid. Executive Summary. Page ES-1 through ES-2.
5 Ibid. IV - Environmental Impact Analysis: A. Air Quality. Page IV.A-40 through IV.A-41.
6 Ibid. Appendix J – Transportation. PDF Page 11.
7 Ibid. II. Project Description. Page II-4.
8 Ibid. Executive Summary. Page ES-1.
9 Ibid. IV - Environmental Impact Analysis: A. Air Quality. Page IV.A-29.
10 Ibid. II. Project Description. Page II-52.

Response to Comment No. AG 4B-2

This comment provides a summary of the Project as provided in Chapter II, *Project Description*, and in Section IV.A, *Air Quality*, of the Draft EIR. Please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which discusses design modifications made to the Project in response to public and agency comments received on the Draft EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories and to reduce the residential density/unit count in Building 2 from 449 units to 335 units, a reduction of 114 units. Additionally, the hotel component (68 rooms) in Building 6 has been removed. With the conversion of the 68 hotel rooms to residential units, as well as the transfer of 114 units from Building 2 to Building 6, the residential unit count in Building 6 has increased from 68 units to 250 units. The Building 6 height has been increased from six stories to 26 stories. Overall, the Project's unit count has been increased from 1,521 units to 1,589 units. Also, the amount of restaurant and retail space within Building 1 has been increased from 16,378 square feet to 61,038 square feet. As such, the Project's overall amount of restaurant/retail square footage has been increased from 101,088 square feet to 145,748 square feet.[2] Within Building 1, the 44,660 square feet

2 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 Project's retail/restaurant uses, the environmental analyses included in Chapter IV, *Environmental Impact Analysis*, of the Draft EIR, evaluates a total of 158,225 square feet of restaurant/retail uses. It is assumed that there would be 67,595 square feet of retail uses and 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

of residential floor area (which was previously designated for residential amenity space) would be removed to accommodate the increase in restaurant and retail square footage. With these modifications, the Project's overall floor area (2,318,534 square feet) would remain the same as analyzed in the Draft EIR. The Project's total parking count has also been reduced from 2,475 spaces to 2,444 spaces. Relevant figures from the Draft EIR have also been revised to illustrate the Project design modifications summarized above. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 4B-3

South Coast AQMD Staff's Comments

Health Risk Assessment (HRA) during Project Operation

CEQA Guidelines Sections 15126.2 and 15126.4 require a Draft EIR to include a description of the significant environmental effects of a Proposed Project, significant environmental effects which cannot be avoided, significant irreversible environmental changes, growth-inducing impacts, and mitigation measures proposed to minimize the significant adverse impacts. An impact is considered significant under CEQA if it leads to a "substantial, or potentially substantial, adverse change in the environment." In addition to the air quality impacts from the criteria air pollutants and greenhouse gases, the adverse air quality health risk impacts associated with increased emissions of toxic air contaminants (TACs) from all sources (including but not limited to expected future permitted stationary sources, mobile sources, and other emission sources) during the operation phases need to be appropriately evaluated using quantitative approaches to justify whether there will be potentially substantial adverse impacts.

Currently the Draft EIR contains a qualitative HRA and concludes that the operation of the Proposed Project would not expose sensitive receptors to substantial Toxic Air Contaminant (TAC) concentrations, thereby deeming the operational TAC impacts less than significant. [11] However, the Proposed Project is expected to operate various equipment, including six emergency generators ranging from approximately 2,000 to 3,350 horsepower, restaurant charbroilers, and on-site cooling towers. Additionally, the Proposed Project will generate 13,724 daily vehicle trips.[12] Notably, the Draft EIR lacks a comprehensive quantitative assessment of the health risks associated with mobile, stationary, and other sources during the operational phase. This omission is concerning because, as previously mentioned, the operation of Fourth and Central is expected to involve various diesel-powered stationary and portable sources and vehicles emitting Diesel Particulate Matter (DPM), a known air toxic and carcinogen. In other words, the potential cancer risk associated with the operation of the Proposed Project is currently unknown and undisclosed. Without substantial evidence or a quantitative HRA to support it, the determination that operational TAC impacts are less than significant appears arbitrary.

[11] Draft EIR. IV - Environmental Impact Analysis: A. Air Quality. Pages IV.A-98 through IV.A-101.
[12] Draft EIR. IV. Environmental Impact Analysis: J. Transportation. Page IV.J-35.

Response to Comment No. AG 4B-3

This comment notes that, while the EIR contains a qualitative health risk assessment (HRA) of the Project's operational toxic air contaminant (TACs) emissions, it lacks a quantitative assessment of the health risks associated with mobile, stationary, and other sources during the operational phase. As a result, the comment states that the potential cancer risk associated with operation of the Project is unknown and undisclosed. However, the comment does not provide substantial evidence that the Project will cause significant air quality impacts not disclosed in the Draft EIR as required by CEQA or that the Draft EIR is otherwise deficient under CEQA.

Pages IV.A-99 through IV.A-101 of Section IV.A, *Air Quality,* in the Draft EIR analyze and disclose the potential for the Project to cause adverse health impacts from exposure to TACs from the Project's operational emissions consistent with CEQA Guidelines Section 15126.2(a). With respect to Project operations, as discussed in Section IV.A, *Air Quality,* on pages IV.A-99 and IV.A-100 of the Draft EIR, the SCAQMD recommends that operational health risk assessments be conducted for substantial sources of operational DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[3] Since the Project would not include any truck stop or warehouse distribution uses, and, as such, operations would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and occasional maintenance, the qualitative analysis performed in the Draft EIR was appropriate for assessing the Project's operational TAC impacts. Additionally, Project delivery and maintenance trucks would be required to comply with the applicable provisions of the CARB Truck and Bus regulation to minimize and reduce PM and NO_X emissions from existing diesel trucks, and these requirements become more stringent over time. In addition, relative to existing conditions, the Project would remove the existing cold storage facilities, and the DPM emissions from the approximately 144 trucks and equipped transportation refrigeration units (TRUs) that currently visit the site on a daily basis would no longer occur. Therefore, given that the Project would remove an existing source of DPM emissions in the local area and that delivery and maintenance trucks that would visit the Project Site in the future would be required to comply with the applicable provisions of the CARB Truck and Bus regulation, which would impose more stringent requirements in future years than current conditions, Project operations would not be a substantial mobile source of diesel particulates.

With respect to stationary sources, as explained on pages IV.A-100 and IV.A-101 of the Draft EIR, Project operation would result in minimal emissions from charbroiling

[3] SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003.

activities associated with the restaurant uses. Restaurants incorporating charbroiling in the Air Basin would be required to comply with SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations), which requires the installation of emissions controls on charbroilers and the emissions controls would minimize the already small amounts of emissions associated with charbroiling (as seen in Draft EIR Section IV.A, *Air Quality*, Tables IV.A-13, IV.A-20, IV.A-25 and IV.A-31) by approximately 83 percent,[4] such that charbroiling would not cause or contribute to adverse health impacts at nearby sensitive receptors.

The Project's emergency generators would be required to comply with SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines), the purpose of which is to control and limit emissions of TACs from emergency generators and similar equipment. In accordance with Rule 1470, emissions from maintenance and testing would not occur daily but, rather, periodically up to 50 hours per year. Furthermore, the emergency generators would be certified to the most stringent CARB and SCAQMD Rule 1470 standards and minimize emissions to the lowest technically feasible and regulatory required level for equipment of this size and type. As shown in Section IV.A, *Air Quality*, Tables IV.A-20 and IV.A-26, of the Draft EIR, PM10 and PM2.5 emissions (i.e., DPM emissions) from the emergency generators would be approximately 0.2 pounds per day with incorporation of Mitigation Measure AQ-MM-3 for only those periodic days in which maintenance and testing would occur. Compliance with Rule 1470 would ensure the TAC emissions from the emergency generators would not cause or contribute to adverse health impacts at nearby sensitive receptors. Therefore, with mitigation, the emissions would not pose a health risk to off-site receptors.

Although a quantitative operational HRA for the Project is not required for the reasons discussed above, in order to provide further substantial evidence to support the Draft EIR's finding of a less-than-significant impact with mitigation as to operational TAC emissions, a quantitative health risk assessment has been performed. See Appendix B – *Health Risk Assessment,* of this Final EIR for additional details. In support of discussion on pages IV.A-99 through IV.A-101 of Section IV.A, *Air Quality*, of the Draft EIR, the findings of the combined construction and operational HRA show that the Project, with incorporation of Mitigation Measures AQ-MM-1 and AQ-MM-2, and by removing health risk from existing sources, would be below the applicable health risk and health hazard significance thresholds (an incremental cancer risk that is greater than 10 in one million for a sensitive receptor would result in a significant impact regarding cancer risk; an incremental chronic hazard index that is greater than or equal to 1.0 for a sensitive receptor would result in a significant impact regarding chronic non-cancer health impacts).

4 USEPA, Methods for Developing a National Emission Inventory for Commercial Cooking Processes: Technical Memorandum, 2003.

Comment No. AG 4B-4

Also, as mentioned, the nearest sensitive receptor, a multi-family residential complex, is located within 120 feet west of the Proposed Project's West site.[13] There are also an additional eight multi-family residential complexes located within 175 feet to 750 feet from various locations of the Proposed Project site.[14] As such, South Coast AQMD staff recommends the Lead Agency conduct an operational phase HRA, which should include evaluating impacts of diesel-powered stationary and portable sources and truck emissions under the foreseeable probable operational conditions. Please refer to the South Coast AQMD's guidance for performing a mobile source health risk assessment.[15] An HRA assessment is essential for determining the potential cancer risk impacts associated with the operation of the Proposed Project to the offsite sensitive receptors and workers so that they can be compared to the South Coast AQMD Air Quality Significance Thresholds for TACs[16] to determine whether there will be a potentially significant air quality impact. The analysis should also disclose the potential health risks for chronic and acute impacts of the Proposed Project's operation on residents living and/or workers working outside the Proposed Project's boundary in the Final EIR.

[13] Ibid. IV - Environmental Impact Analysis: A. Air Quality. Page IV.A-29.
[14] Ibid. IV - Environmental Impact Analysis: A. Air Quality. Page IV.A-29.
[15] South Coast AQMD's guidance for performing a mobile source health risk assessment is available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc
[16] South Coast AQMD. Air Quality Significance Thresholds. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf

Response to Comment No. AG 4B-4

This comment recommends preparation of a quantitative HRA to evaluate the potential health risks for chronic and acute impacts of the Project's operation on residents living and/or workers working outside the Project's boundary. Although a quantitative operational HRA for the Project is not required for the reasons discussed above, in order to provide further substantial evidence to support the Draft EIR's finding of a less-than-significant impact with mitigation as to operational TAC emissions, a quantitative HRA has been prepared. See Appendix B – *Health Risk Assessment,* of this Final EIR for additional details). As discussed therein, conservatively, off-site sensitive residential receptors and worker receptors within a quarter mile of the Project Site were considered within the quantitative HRA.

As shown in detail in Appendix B – *Health Risk Assessment,* of this Final EIR, the cancer risk for maximum impacted off-site residential receptors would be below the significance threshold. The maximum chronic health risk for off-site residential receptors would also be below the significance thresholds.

In support of the discussion on pages IV.A-99 through IV.A-101 of Section IV.A, *Air Quality*, of the Draft EIR, the findings of the combined construction and operational HRA

show that the Project, with incorporation of AQ-MM-1[5] and AQ-MM-2, and by removing health risk from existing sources, would result in cancer risk below the 10 in one million threshold for the maximum impacted air quality-sensitive resident receptors. In addition, hazard index values for residential receptors were below the 1.0 threshold. Worker receptors within the Project area were also included in the quantitative health risk assessment. See Appendix B – *Health Risk Assessment,* of this Final EIR for additional details. In support of discussion on pages IV.A-99 through IV.A-101 of Section IV.A, *Air Quality*, of the Draft EIR, the findings of the combined construction and operational HRA show that the Project, with incorporation of AQ-MM-1 and AQ-MM-2 and by removing health risk from existing sources, would result in cancer risk below the 10 in one million threshold for the maximum impacted workers. The maximum chronic health risk for workers would also be below the 1.0 significance threshold. The results of the refined AERMOD dispersion modeling provides further substantial evidence that TAC emissions from operational activities would not expose off-site sensitive receptors and workers to substantial TAC concentrations.

All other air quality-sensitive uses are located at greater distances from the Project Site than those considered in the HRA and would result in risks below those identified for the off-site residents and workers considered within the HRA from potential sources of pollutants from the Project Site due to atmospheric dispersion effects in Appendix B of this Final EIR. These risks would be less than significant as discussed above.

Comment No. AG 4B-5

Health Risk Assessment (HRA) during Project Construction

Similar to the operational phase of the Proposed Project, the adverse air quality health risk impacts associated with increased emissions of TACs from all sources during the construction phases also needs to be appropriately evaluated using quantitative approaches to justify whether there will be potentially substantial adverse impacts. The Proposed Project's Draft EIR does not contain a comprehensive quantitative assessment of the health risk associated with mobile, stationary and other sources during the construction phase. Rather, the Proposed Project contains a qualitative TAC analysis.[17] As a result, the potential cancer risk linked to the Proposed Project's five-year construction phase is unknown and undisclosed.

During construction, the Proposed Project is expected to generate more than 55,000 haul truck and concrete truck trips. With nine multi-family residential complexes located within 120 feet to 750 feet from various locations of the Proposed Project site, South Coast AQMD staff is concerned about the potential cancer risk linked to the Proposed Project's construction activity. Given this, South Coast AQMD Staff recommends the Lead Agency

5 Mitigation Measure AQ-MM-1 has been refined to account for suggestions by the SCAQMD. Refer to Response to Comment No. AG 4B-6 in the SCAQMD letter dated November 28, 2023 and Section III, *Revisions, Clarifications and Corrections to the Draft EIR,* of this Final EIR for additional information regarding modified Mitigation Measure AQ-MM-1.

to conduct a construction phase HRA, which should include evaluating impacts of truck emissions (including the truck routes to and from the site and their proximity to the sensitive receptors) and the impact of diesel-powered stationary and portable sources under the foreseeable probable construction conditions. The analysis should also disclose the potential health risks for chronic and acute impacts of the Proposed Project's construction on residents living and/or workers working outside the Proposed Project's boundary in the Final EIR.

[17] Draft EIR. IV - Environmental Impact Analysis: A. Air Quality. Pages IV.A-98 through IV.A-101.

Response to Comment No. AG 4B-5

This comment notes that, while the EIR contains a qualitative HRA of the Project's construction TACs emissions, it lacks a quantitative assessment of the health risks associated with mobile, stationary, and other sources during the construction phase. As a result, the comment states that the potential cancer risk associated with construction of the Project is unknown and undisclosed and recommends preparation of an quantitative HRA to evaluate the potential health risks for chronic and acute impacts of the Project's construction on residents living and/or workers working outside the Project's boundary. However, the comment does not provide substantial evidence that the Project will cause significant air quality impacts not disclosed in the Draft EIR as required by CEQA or that the Draft EIR is otherwise deficient under CEQA. Pages IV.A-98 and IV.A-99, in Section IV.A, *Air Quality*, of the Draft EIR, analyze and disclose the potential for the Project to cause adverse health impacts from exposure to TACs from the Project's construction emissions consistent with CEQA Guidelines Section 15126.2(a). As discussed therein, with respect to Project construction, the Project would be consistent with applicable SCAQMD Air Quality Management Plan strategies intended to reduce emissions from construction equipment and activities, which include the use of cleaner construction equipment. The Project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these CARB regulations would minimize emissions of TACs during construction.

The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition and construction activities. As stated in the Project's Initial Study, included as Appendix A-2 of the Draft EIR, demolition activities for the Project would include the removal of existing buildings, structures, and associated infrastructure. As such, hazardous materials may be present in the structures because of their age. The hazardous materials may include asbestos-containing materials and lead based paint. If present, the hazardous materials are required to be managed and disposed of in accordance with applicable laws and regulations.[6] Based on the short-term duration of Project construction and compliance

[6] Impacts from asbestos and lead-based paint from demolition are expected to be less than significant. For additional details, refer to the Project's Initial Study, included as Appendix J of the Draft EIR.

with regulations that would minimize emissions, construction of the Project would not expose sensitive receptors to substantial TAC concentrations.

Furthermore, as discussed in Threshold (b) on pages IV.A-65 through IV.A-88 of the Draft EIR, the Project would be required to implement Mitigation Measures AQ-MM-1 and AQ-MM-2 to reduce regional NO_X emissions. These measures would have co-benefits of reducing emissions of PM10 and PM2.5 from heavy-duty diesel construction equipment (see Tables IV.A-14 through IV.A-18), further reducing the TAC emissions during construction activities.

As explained in the California Office of Environmental Health Hazard Assessment (OEHHA) Guidance Manual, there is "considerable uncertainty" in evaluating cancer risk over short-term durations.[7] In addition, the Guidance Manual does not identify short-term projects or non-stationary source projects that warrant the preparation of a HRA or recommend the preparation of HRAs for short-term construction projects or non-stationary source projects, such as the Project. Furthermore, in addition to OEHHA highlighting the considerable uncertainty in meaningfully evaluating short term exposures to TACs, the SCAQMD has stated that it "currently does not have guidance on construction Health Risk Assessments."[8] As disclosed in the Draft EIR on page IV.A-98, according to the OEHHA and the SCAQMD Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis,[9] health effects from TACs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary construction schedule (approximately 56 months), the Project would not result in a long-term (i.e., lifetime or 70-year) exposure as a result of Project construction.

Although a quantitative construction HRA for the Project is not required for the reasons discussed above, to provide information that further supports the Draft EIR's determination that impacts with respect to construction TAC emissions are less than significant with mitigation, a quantitative HRA has been completed. See Appendix B – *Health Risk Assessment,* of this Final EIR. In support of the discussion on pages IV.A-98 and IV.A-99 of Section IV.A, *Air Quality*, of the Draft EIR, the findings of the combined

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7 Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, February 2015, page 8-17.

8 South Coast Air Quality Management District, Final Environmental Assessment for: Proposed Amended Rule 307.1 – Alternative Fees for Air Toxics Emissions Inventory; Proposed Amended Rule 1401 – New Source Review of Toxic Air Contaminants; Proposed Amended Rule 1402 – Control of Toxic Air Contaminants from Existing Sources; SCAQMD Public Notification Procedures for Facilities Under the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) and Rule 1402; and, SCAQMD Guidelines for Participating in the Rule 1402 Voluntary Risk, page 2-23, September 2016. The SCAQMD only applies the revised OEHHA Guidelines for operational impacts at stationary industrial source facilities that are in the AB 2588 Air Toxics Hot Spots program, which does not apply to the Project.

9 SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003.

construction and operational HRA show that the Project, with incorporation of Mitigation Measures AQ-MM-1 and AQ-MM-2 and by removing the health risk from existing sources, would result in a cancer risk below 10 in one million for the maximum impacted air quality-sensitive resident receptors and hazard index values for sensitive receptors below 1.0 (refer to Response to Comment No. No. AG 4B-4, above, for a discussion of the HRA results for off-site residents).[10] Other sensitive receptors would result in lower air pollutant health risk impacts from the Project due to atmospheric dispersion effects. Furthermore, worker receptors within the Project area were included in the quantitative HRA. See Appendix B – *Health Risk Assessment,* of this Final EIR for additional details. In support of discussion on pages IV.A-98 through IV.A-101 of Section IV.A, *Air Quality*, of the Draft EIR, the findings of the combined construction and operational HRA show that the Project, with incorporation of Mitigation Measures AQ-MM-1 and AQ-MM-2 and by removing health risk from existing sources, would result in a cancer risk below 10 in one million for the maximum impacted workers and hazard index values for workers below 1.0 (refer to Response to Comment No. No. AG 4B-4, above, for a discussion of the HRA results for off-site workers). Other worker receptors would result in lower air pollutant health risk impacts from the Project due to atmospheric dispersion effects. The results of the refined AERMOD dispersion modeling provides further substantial evidence that TAC emissions from construction activities would not expose off-site sensitive receptors and workers to substantial TAC concentrations.

Comment No. AG 4B-6

Air Quality Mitigation Measures (MM) to Reduce NOx and CO Emissions from Construction

Even with the MMs proposed by the Lead Agency for the construction phase, the Proposed Project still exceeds NOx and CO South Coast AQMD regional significant thresholds.[18] Specifically, Air Quality (AQ) MM-1 states that the Proposed 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 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…'[19] Given the approximately five-year construction phase of the Proposed Project that is expected to start as early as 2025 and end in 2029 under the most intensive schedule,[20,21] Tier 4 technology may not be the cleanest technology when construction occurs in the later years of the Proposed Project.

[10] Note AQ-MM-1 has been refined to account for suggestions by the SCAQMD. Refer to Response to Comment No. AG 4B-6 in the SCAQMD letter dated November 28, 2023 and Section III, *Revisions, Clarifications and Corrections to the Draft EIR,* of this Final EIR for additional information regarding modified Mitigation Measure AQ-MM-1.

[18] Ibid. IV - Environmental Impact Analysis: A. Air Quality. Page IV.A-83 through IV.A-83.
[19] Ibid. IV - Environmental Impact Analysis: A. Air Quality. Page IV.A-66.
[20] Ibid. II. Project Description. Page II-52.
[21] Ibid. IV - Environmental Impact Analysis: A. Air Quality. Page IV.A-39.

Response to Comment No. AG 4B-6

This comment states that Tier 4 technology, which is included in Mitigation Measure AQ-MM-1, may not be the cleanest technology when construction occurs in the later years of the Project. Refer to Response to Comment No. AG 4B-7, which addresses construction equipment requirements and refinements included in Mitigation Measure AQ-MM-1.

Comment No. AG 4B-7

One of CARB's strategies for reducing emissions from off-road construction equipment aims to start implementing off-road Tier 5 in 2027/2028.[22] Furthermore, California Governor Newsom's Executive Order in September 2020 (N-79-20) requires CARB to develop and propose a full transition to Zero Emissions (ZE) off-road equipment by 2035, where feasible.[23] Considering the duration of the Proposed Project's construction phase and its proximity to sensitive receptors, it is crucial to ensure that the levels of construction emissions, specifically NOx and CO, remain as low as possible during the construction period. Moving towards achieving this goal, where feasible, involves opting for electric emission-free engines instead of diesel-fueled engines for the construction equipment. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to minimizing the project's environmental footprints. The abatement of NOx can also be pursued by enforcing greener constructions, such as limiting the usage of older engines in favor of adopting the latest available technologies, or even incorporating exhaust retrofits such as cutting-edge exhaust aftertreatment techniques. Additionally, several other resources to assist the Lead Agency with identifying additional potential MMs for the Proposed Project are included in the South Coast AQMD's CEQA Air Quality Handbook[24] for both operational and construction emissions.

[22] Presentation accessed at: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management- plans/2022-air-quality-management-plan/combined-construction-carb-amp-aqmp-presentations-01-27-21.pdf
[23] Presentation accessed at: https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf
[24] https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

Response to Comment No. AG 4B-7

This comment references future CARB strategies to reduce emissions from off-road construction equipment and notes the importance of keeping NOx and CO emissions levels as low as possible during the Project's construction period. The Draft EIR concluded in Table IV.A-14 through IV.A-18 on pages IV.A-78 to IV.A-83, that even with mitigation, the Project is expected to result in significant impacts related to regional NO_X and CO emissions during the proposed construction of the Project. Additionally, Table

IV.A-19 of the Draft EIR shows that regional CO emissions during Project interim operations and concurrent construction of the remaining buildings would also exceed the SCAQMD regional significance thresholds even with mitigation. On November 3, 2021, CARB held the first public workshop on the development of Tier 5 emission standards that will seek to further reduce NO_X from off-road engines by 50 percent and PM emissions from off-road engines by 90 percent in comparison to Tier 4 emission standards. Based on the latest workshop titled Tier 5 Rulemaking Workshop II Amendments to the Off-Road Diesel New Engine Regulations held by CARB on October 30-31, 2023, four Tier 5 standard implementation schedule options were presented with implementation beginning in 2029 to beyond 2034, depending on engine power category and implementation schedule options.[11] In addition, as discussed in CARB's Tier 5 Rulemaking Workshop II Amendments to the Off-Road Diesel New Engine Regulations workshop and on page 13 of the SCAQMD presentation referenced in this comment, CARB and SCAQMD describe that electrification/hybridization requirements may be included in Tier 5 emission standards, which would support the Governor's Executive Order (directing CARB to develop and propose a full transition to Zero Emissions by 2035, wherever feasible). Consistent with SCAQMD's recommendation, the City has revised Mitigation Measure AQ-MM-1 to commit to using Tier 5 construction equipment, when and where such equipment is commercially available, and to commit to using feasible electric construction equipment. Refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR.

Furthermore, consistent with SCAQMD'S recommendation, Mitigation Measure AQ-MM-1 has been revised in the Final EIR to include feasible electric emission-free construction equipment. As stated therein, 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 (please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR for additional information regarding the Project with design modifications and revised Mitigation Measure AQ-MM-1). Accordingly, Table IV.A-14 through IV.A-19 on pages IV.A-78 to IV.A-83, have been updated with the emissions reductions due to the revised Mitigation Measure AQ-MM-1.

As presented in updated Table IV.A-19 of the Final EIR, regional CO emissions during Project interim operations and concurrent construction of the remaining buildings would be reduced to below SCAQMD regional significance thresholds with the addition of electric emission-free equipment in Mitigation Measure AQ-MM-1. However, as shown in the updated Table IV.A-14 through IV.A-18, even with the updated mitigation, the Project is expected to result in significant impacts related to regional NO_X and CO emissions

[11] CARB, Tier 5 Rulemaking Workshop II Amendments to the Off-Road Diesel New Engine Regulations, October 30-31, 2023.

during proposed construction (please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR.

Comment No. AG 4B-8

South Coast AQMD Air Permits and Role as a Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as a CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project analysis in its current form in the Draft EIR is inadequate to be relied upon for this purpose.

Response to Comment No. AG 4B-8

This comment indicates that when air permits from SCAQMD are required, SCAQMD's role changes from a commenting agency to a responsible agency. A "responsible agency" under CEQA is any public agency that "proposes to carry out or approve a project, for which a lead agency is preparing or has prepared an EIR or negative declaration" and for which it has discretionary approval over all or part of that project. (Cal. Code Regs., tit. 14, § 15381; see also Pub. Res. Code, § 21069.) While CEQA outlines the role and responsibility of a responsible agency, it does not mandate a lead agency to designate a responsible agency. Rather, SCAQMD would become a responsible agency if it becomes responsible for issuing a discretionary approval regarding the Project. As such, SCAQMD is not a responsible agency.

Nevertheless, SCAQMD's comments raised throughout this comment letter are all sufficiently responded to within this Final EIR consistent with CEQA requirements. The comment or the prior comments included in this letter do not provide any substantial

evidence that indicates that the EIR includes a deficient Project Description under CEQA or any other substantial evidence that the EIR is flawed in any manner such that the analysis included in the EIR cannot be relied upon by SCAQMD to issue air permits.

Comment No. AG 4B-9

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at http://www.aqmd.gov/home/permits.

Response to Comment No. AG 4B-9

This comment states that for the above reasons, the EIR should be revised to include a discussion about any and all new stationary and portable equipment requiring SCAQMD air permits, provide the evaluation of their air quality and GHG impacts, and identify SCAQMD as a Responsible Agency for the Proposed Project. Refer to Response to Comment No. No. AG 4B-8, above, for a discussion of SCAQMD's authority as a responsible agency.

As discussed on page IV.A-41 and page IV.E-60 in Section IV.A, *Air Quality*, and IV. E, *Greenhouse Gas Emissions* of the Draft EIR, and as revised in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, Project stationary sources would include six emergency generators. 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 2,000 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), 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.[12] The emergency generators would result in emissions during maintenance and testing operations. As discussed in Section IV.A, *Air Quality*, of the Draft EIR, emergency generators are permitted by the SCAQMD and regulated under SCAQMD Rule 1470. Maintenance and testing would not occur daily but, rather, periodically up to 50 hours per year per Rule 1470. Emergency generator AQ and GHG emissions methodology, emission factors and associated emissions are discussed in Draft EIR sections IV.A, *Air Quality*, IV. E, *Greenhouse Gas Emissions*, and Appendix B – *Air Quality/Greenhouse Gas Emissions Technical Documentation* and presented in Tables IV.A-12, IV.A-13, IV.A-19, IV.A-32 and Table IV.E-11. Further, the Project would include Mitigation Measure AQ-MM-3, which would reduce regional NO_X and CO emissions from operations by scheduling routine maintenance of emergency generators so that only one emergency generator is maintained on any given day.

As discussed on page IV.A-40 of the Draft EIR, the Project would include restaurant charbroilers. As described in SCAQMD Rule 219, charbroilers do not require an air permit, and Project charbroilers would be electric. However, charbroilers are required to abide by the requirements under SCAQMD Rule 222 and as discussed on page IV.A-40 of the Draft EIR, charbroilers are required to comply with emissions control requirements consistent with SCAQMD Rule 1138. Charbroilers air quality emissions methodology, emission factors, and associated emissions are discussed in Draft EIR Section IV.A, *Air Quality*, and Appendix B – *Air Quality/Greenhouse Gas Emissions Technical Documentation,* and presented in Tables IV.A-12, IV.A-13, IV.A-19, IV.A-32 and Table IV.E-11.

As discussed on pages IV.A-41, IV.E-60 and IV.E-61 of the Draft EIR, Project stationary sources would include cooling towers. As described in SCAQMD Rule 219, cooling towers do not require an air permit and are not subject to the requirements under SCAQMD Rule 222 unless they are industrial cooling towers located in a chemical plant, refinery or other industrial facility. Cooling tower air quality and GHG emissions methodology, emission factors, and associated emissions are discussed in Draft EIR Sections IV.A*, Air Quality*, IV.E, *Greenhouse Gas Emissions,* and Appendix B – *Air Quality/Greenhouse Gas Emissions Technical Documentation,* and presented in Tables IV.A-12, IV.A-13, IV.A-19, IV.A-32 and Table IV.E-11.

[12] Note for the modified Project as described in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, 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 2,000 kilowatts (2,682 horsepower), 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). The remaining emergency generators on the South Site and West Site would have the same estimated capacity as for the generators analyzed for the Project as described in the Draft EIR. Therefore, overall provided emergency power provided by the emergency generators and associated emissions for the modified Project in this Final EIR and the Project analyzed in the Draft EIR would be the same.

As discussed on page IV.A-40 and page IV.E-56, the Project buildings would be all-electric and would not use any natural gas, supporting local and State sustainability goals and decarbonization strategies consistent with the City's All-Electric Building Ordinance and CARB's 2022 Climate Change Scoping Plan for Achieving Carbon Neutrality. See Section IV.E, *Greenhouse Gas Emissions*, of the Project's Draft EIR for additional details. Accordingly, natural gas would not be supplied to support proposed Project operational activities related to building energy, such as for boilers providing space heating or building hot water. The Project would not result in installation of any new natural gas infrastructure. While building electrification would result in higher electricity usage, it would eliminate the use of a fossil fuel and the associated criteria pollutant emissions (i.e., natural gas combustion) from building energy demand. Additionally, building electrification GHG emissions methodology, emission factors, and associated emissions are discussed in Draft EIR Section IV.E, *Greenhouse Gas Emissions,* and Appendix B – *Air Quality/Greenhouse Gas Emissions Technical Documentation*, and presented in Tables IV.E-11 on page IV.E-93, in Section IV.E. *Greenhouse Gas Emissions*, of the Draft EIR.

As shown above, the Project's Draft EIR includes discussion of all new stationary equipment requiring SCAQMD air permits, as well as those that do not require air permits, and provides the evaluation of their AQ and GHG impacts. As such, no further response is warranted.

Comment No. AG 4B-10

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Response to Comment No. AG 4B-10

This comment provides a conclusionary comment regarding responses to comments in accordance with CEQA requirements. Responses to each of SCAQMD's comments are provided in Response to Comment Nos. AG 4B-1 to AG 4B-10. The responses have been prepared in accordance with the requirements of CEQA Guidelines Section 15088. The City will provide SCAQMD with responses to their comments at least 10 days prior to the certification of the Final EIR.

Comment No. AG 4B-11

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Response to Comment No. AG 4B-11

The comment provides SCAQMD contact information in the event additional information is needed. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment Letter No. AG 5

Los Angeles County Metropolitan Transportation Authority (LA Metro)
Cassie Truong, Senior Transportation Planner
Development Review Team Transit Oriented Communities
Received November 27, 2023

Comment No. AG 5-1

Thank you for the opportunity to comment on the Fourth and Central Project. Attached are Metro's comments. Please kindly reply to confirm receipt.

Please let me know if you have any questions.

Response to Comment No. AG 5-1

This comment references an attached letter from LA Metro dated November 27, 2023 from LA Metro's Development Review Team to the Department of City Planning. The content of the letter is provided in Comment Nos. AG 5-2 to AG 5-9. See Response to Comment Nos. AG 5-2 to AG 5-9 for responses to the comments raised in this letter.

Comment No. AG 5-2

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Fourth & Central Project (Project) located at 400 South Central Avenue in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Environmental Impact Report (EIR) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the Metro facilities and services which should be analyzed in the EIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.[1]

[1] See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Response to Comment No. AG 5-2

The comment provides background information on Metro and introduces comments on the Project provided below, which is noted by the City. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 5-3

In addition to the specific comments outlined below, Metro is providing the City and CP LA Cold Storage Land, LLC (Applicant) with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at https:(/www.metro.net/devreview.

Response to Comment No. AG 5-3

This comment indicates that Metro has provided a copy of the Metro Adjacent Development Handbook, which provides an overview of common concerns for development adjacent to Metro ROW and transit facilities to the Applicant and City. The City has reviewed the handbook, and the Project would not affect the Metro ROW or transit facilities nearest to the Project Site.

Comment No. AG 5-4

Project Description

The Project includes a mix of residential, office, restaurant/retail, and hotel uses within 10 distinct buildings over the three Sites totaling up to 2,318,534 square feet of floor area. The proposed buildings would range in height from 2 to 44 stories, with a maximum height of approximately 500 feet. Parking would be provided in up to four levels of subterranean parking and in above-grade parking podiums. The Project is anticipated to commence as early as 2025.

Response to Comment No. AG 5-4

This comment provides a summary of the components of the Project as provided in Chapter II, *Project Description*, of the Draft EIR. Please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes the design modifications made to the Project in response to public and agency comments received on the Draft EIR. As shown therein, and as noted above in the Response to Comment No. AG 3B-2, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories, while increasing the height of Building 6 (on the South Site) from six stories to 26 stories, and to reduce the residential density/unit count in Building 2 from 449 units to 335 units, a reduction of 114 units. Additionally, the hotel component (68 rooms) in Building 6 has been removed. With the conversion of the 68

hotel rooms to residential units, as well as the transfer of 114 units from Building 2 to Building 6, the residential unit count in Building 6 has increased from 68 units to 250 units. Overall, the Project's unit count has been increased from 1,521 units to 1,589 units. Also, the amount of restaurant and retail space within Building 1 has been increased from 16,378 square feet to 61,038 square feet. As such, the Project's overall amount of restaurant/retail square footage has been increased from 101,088 square feet to 145,748 square feet.[13] Within Building 1, the 44,660 square feet of residential floor area (which was previously designated for residential amenity space) would be removed to accommodate the increase in restaurant and retail square footage. With these modifications, the Project's overall floor area (2,318,534 square feet) would remain the same as analyzed in the Draft EIR. The Project's total parking count has also been reduced from 2,475 spaces to 2,444 spaces. Relevant figures from the Draft EIR have also been revised to illustrate the Project design modifications summarized above. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 5-5

Recommendations for EIR Scope and Content

Metro West Santa Ana Branch Transit Corridor Project Adjacency

The West Santa Ana Branch Transit Corridor (WSAB) project is a 19-mile corridor that Metro is evaluating for a new light rail transit (LRT) line that would connect southeast LA County to downtown Los Angeles. Metro released a Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the WSAB project in July 2021. In January 2022, the Metro Board approved LA Union Station as the northern terminus and selected Pioneer Station to Slauson/A Line (Blue) as the Locally Preferred Alternative (LPA). The LPA is the focus of the Final EIS/EIR which is anticipated to be released for public comment in the first quarter of 2024.

The Metro Board also directed a new study in the downtown area to identify a cost-effective alignment for the WSAB Slauson/A Line (Blue) to Los Angeles Union Station (LAUS) segment. Staff is working with the Downtown stakeholder working group, including key residents, businesses, organizations, councils, BIDs, et.al., to explore possibilities for a cost-effective alignment for this segment. The WSAB project team met with LA Cold Storage on October 18, 2022 and discussed WSAB alignments, concerns and potential opportunities for WSAB and the Project. Metro will continue to coordinate

[13] 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 Project's retail/restaurant uses, the environmental analyses included in Chapter IV, *Environmental Impact Analysis*, of the Draft EIR, evaluates a total of 158,225 square feet of restaurant/retail uses. It is assumed that there would be 67,595 square feet of retail uses and 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

with key property owners, including LA Cold Storage, as the Slauson/A Line to LAUS Study advances.

Additional information on the WSAB project and the Draft EIS/EIR can be found on the WSAB Project webpage at https://www.metro.net/wsab.

Response to Comment No. AG 5-5

The comment provides information regarding the WSAB and new Metro LRT line that would connect southeast LA County to downtown Los Angeles. The comment also discusses a new study directed by the Metro Board in the downtown area to identify a cost-effective alignment for the WSAB Slauson/A Line (Blue) to the Los Angeles Union Station (LAUS) segment. The City acknowledges that Metro will continue to coordinate with key property owners, including LA Cold Storage, as the Slauson/A Line to LAUS Study advances. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 5-6

Transit Supportive Planning: Recommendations and Resources

Considering the Project's proximity to the potential transit stops, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit Connections and Access: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:

    a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access nearby transit services.

Response to Comment No. AG 5-6

This comment recommends that the City encourage the Applicant to provide features that promote walkability in and around the Project Site. The Project would include new ADA-compliant sidewalks, street trees, and lighting in accordance with City requirements. The Project would also provide commercial uses along the ground floor to encourage pedestrian activity and would locate bicycle parking throughout the Project Site. The public sidewalks along Central Avenue, 4th Street, Alameda Avenue, and Gladys Avenue would be removed and replaced with upgraded and tree-lined sidewalks. Public

sidewalks, which currently vary from 10 to 16 feet, would be replaced by new 15 foot-wide sidewalks along the Project's frontages, meeting minimum widths included in the City's Mobility Plan. Pedestrian crosswalks at the intersections of Alameda Street and 4th Street, 4th Street and Central Avenue, and 5th Street and Central Avenue would be maintained and would provide connections between the North, South, and West Sites. The City would continue to work with the Applicant in advancing Metro's recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 5-7

b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The Applicant should also coordinate with the Metro Bike Share program for a potential Bike Share station at this development.

Response to Comment No. AG 5-7

This comment recommends that the City encourage the Applicant to provide features that promote bicycle use and mobility in and around the Project Site. The LAMC regulates bicycle parking and does not include provisions specifically related to micro-mobility devices. The Project would provide short term and long-term bicycle parking as required by the LAMC. Overall, the Project would provide 146 short-term bicycle parking spaces and 596 long-term bicycle parking spaces, consistent with LAMC Sections 12.21 A.4 and 12.21 A.16(a)(2) requirements and the Mobility Plan. In addition, the Project would include a bicycle-friendly site design, which would locate short-term bicycle parking near entrances to the commercial uses. Secured bicycle parking facilities would also be provided throughout the Project Site. The City would continue to work with the Project Applicant in advancing Metro's recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 5-8

c. First & Last Mile Access: The Project should address first-last mile connections to transit and is encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability path design guidelines.pdf

Response to Comment No. AG 5-8

This comment recommends that the City encourage the Applicant to provide features that promote first-mile/last-mile access. The Project Site is located within a Transit Priority Area (TPA) approximately 0.5 miles from the Metro A and E Lines Little Tokyo/Arts District Station and in close proximity to bus lines operated by Metro, LADOT DASH, and Montebello Bus Lines. As discussed above, the existing sidewalks would be improved, and accessible bicycle parking would be provided throughout the Project Site, in addition to a bicycle share station, lockers, fix-it/repair stations, and showers, to promote alternative modes of transportation. The City would continue to work with the Project Applicant in advancing Metro's recommendations in this comment. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 5-9

2. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

Response to Comment No. AG 5-9

As discussed in Section IV.J, *Transportation*, in the Draft EIR, the Project would provide 2,475 vehicle parking spaces, 146 short-term bicycle parking spaces, and 596 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. In addition, consistent with this comment and pursuant to regulatory requirements, the Project will implement a TDM program that will reduce single-occupancy vehicle trips and VMT. As described on page IV.J-35 in

Section IV.J, *Transportation*, in the Draft EIR, the Project's TDM Program measures would include, but are not necessarily limited to, the following:

- Reduced Parking Supply: The Project would provide less on-site vehicle parking than the amount required by the direct application of LAMC parking rates, without consideration of allowable parking reduction mechanisms such as reduced parking rates for developments within a State Enterprise Zone or Central City Parking District and vehicle parking reductions related to bicycle parking replacement. A reduced parking supply makes parking less available and, therefore, encourages the use of non-automobile modes to and from the Project Site and reduces VMT.
- Parking Cash-Out: The Project would comply with the state parking cash-out law, which requires employers who provide subsidized parking to offer employees a cash allowance in lieu of a parking space.
- Bicycle Share Station: The Project would also provide a bicycle share station in order to support first-mile/last-mile service for transit users and reduce reliance on personal automobiles.
- Bicycle Parking per LAMC: The Project would provide bicycle parking spaces in compliance with the requirements of the LAMC.

Should implementation of the selected TDM measures become infeasible for the Project, substitute TDM measures would be implemented that would be equivalent or superior in reducing vehicle trips and VMT. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 5-7

3. Transit Pass Programs: Metro would like to inform the Applicant of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at https://www.metro.net/riding/eapp/.

Response to Comment No. AG 5-7

This comment informing the Project Applicant of Metro's employer transit pass programs is noted by the City. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 5-8

If you have any questions regarding this letter, please contact me by phone at 213.418.3484, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Response to Comment No. AG 5-8

The comment provides Metro contact information in the event additional information is needed. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. AG 5-9

Attachments and links:

- Adjacent Development Handbook: https://www.metro.net/devreview

Response to Comment No. AG 5-9

The comment is a copy of LA Metro's informational guidebook, which is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services. The Project developer will consider the information in the guidebook, as applicable, to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment Letter No. ORG 1A

Little Tokyo Service Center
Grant Sunoo
231 E Third Street, G-106
Los Angeles, CA 90013
Received October 25, 2023

Comment No. ORG 1A-1

By way of introduction, my name is Grant Sunoo and I work at the Little Tokyo Service Center. We work with many low income stakeholders in Little Tokyo and the surrounding area.

I understand that the draft EIR for the 4th and Central project is currently in its comment period. I have a couple quick requests:

1) Could you make a hard copy available at the Little Tokyo branch of the LA Public Library

2) We have 100s [sic] senior citizen stakeholders who come to our office for services, so I would also appreciate if we could have a copy delivered to our office as well. (Address is below)

3) Will the draft EIR be translated into any languages other than English? As you probably know, for many of the people who live around the vicinity of the site, English is not their first language. For example, we provide services in Japanese, Korean, Spanish, and Chinese as well as English. Language access is very important for local community members who are just now trying to understand this project.

Finally - just to give you a heads up, we have pretty serious concerns about trying to brief community members on this project and the huge EIR during this limited public comment period, so we will be formally requesting an extension to the period.

Response to Comment No. ORG 1A-1

This comment requests an extension of time to respond to the Draft EIR and asks several questions about the availability of the Draft EIR. The following response to the comment was provided by Los Angeles Department of City Planning Staff on October 26, 2023:

> *Thank you for your email. Regarding the several requests that you made, a copy of the Draft EIR and all of its Appendices is available at the Little Tokyo Branch Library. There is also a copy at the Los Angeles Central Library and the Robert Louis Stevenson Ranch Library.*
>
> *We don't usually order more physical copies other than the ones that we've already printed and sent to the libraries and the ones we have in the office,*

but we do have USBs that are available for purchase? [sic] Alternatively, you may access digital copies of the Draft EIR and its Appendices at the website here for free: Fourth & Central Project I Los Angeles City Planning (lacity.org) Unfortunately, we also do not translate our Draft EIR documents either. I know you mentioned several different languages in your email, but what specific language would you need a translation for?

Regarding your request for a time extension, because the Project and its associated environmental review has been consistent with both LAMC and CEQA requirements, at this time we have not identified any unusual circumstances that would warrant an additional extension. Please keep in mind that while the DEIR comment period ends on November 27, 2023, written public comment is welcome at point in time up until the Project goes before a decision-maker. Any and all public comments will be included in the Project's case file and will be provided for review by any associated decision- making bodies.

Thank you for your email, and please do not hesitate to contact me if you have any further questions.

In addition to the above response regarding an extension of the comment period, the original public review comment period was extended by the City to end on December 11, 2023. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter dated November 16, 2023 for further discussion of the Project's Draft EIR comment period extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines.

Comment Letter No. ORG 1B

Little Tokyo Service Center
Grant Sunoo
231 E Third Street, G-106
Los Angeles, CA 90013
Received December 11 and December 12, 2023

Comment No. ORG 1B-1

On behalf of Erich Nakano and Little Tokyo Service Center, attached please find our public comment letter relative to the draft EIR for the 4th & Central project.

If you have any questions, please feel free to contact me or Erich Nakano (enakano@ltsc.org).

Response to Comment No. ORG 1B-1

The statement introduces Little Tokyo Service Center's comments on the Draft EIR within an attached letter. As the comment does address the adequacy or content of the Draft EIR, no further response is necessary.

Comment No. ORG 1B-2

Approximately how long will it be before the file is updated to include all of the letters?

Response to Comment No. ORG 1B-2

The comment asks a question regarding the Final EIR. The following response was provided to the comment by Los Angeles Department of City Planning Staff on December 12, 2023:

> *We need some time to address all comments that we've received on the Project. Since the comment period ended yesterday, we do not yet have an estimation of how long it will take to publish the Final EIR with responses to all comments. But your email (as well as the emails of all commenters) has been added to our interested parties list, and you will receive any updates that we have on the Project's status.*
>
> *Please let me know if you have any other questions or concerns.*

As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 1B-3

I am submitting this comment letter on behalf of the Little Tokyo Service Center (LTSC). LTSC is a 40+ year old organization focused on providing a comprehensive array of social welfare and community development services to assist low-income individuals and other persons in need in Little Tokyo and throughout the Los Angeles region. LTSC provides direct social services to low income seniors, unhoused people, small businesses, and families in the neighborhood. We also conduct community organizing around land-use policy & housing justice issues in and around Little Tokyo.

LTSC has a history of fighting for social justice and racial equity in community planning and land use issues in Little Tokyo as well as throughout the DTLA region. Alongside our partners in Skid Row and Chinatown we have led the Central City United coalition and also been deeply involved in the campaigns leading to successful passage of Measures ULA and JJJ.

In our capacity as a member of the Little Tokyo Community Council, core partner of Sustainable Little Tokyo, and ally to our neighbors in Skid Row, LTSC staff has worked closely with local stakeholders to conduct analysis of the Environmental Impact Report submitted by the developer of the 4th and Central project.

Response to Comment No. ORG 1B-3

This comment provides background information about the LTSC and indicates that LTSC staff have worked closely with local stakeholders to conduct analysis of the EIR for the Project. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 1B-4

While we have found the review period for public comments to be inadequate, our preliminary analysis is that the Draft EIR as submitted does NOT meet the standards articulated in the CA Environmental Quality Act (CEQA) guidelines for disclosure of a project's significant environmental effects.

We are supportive of and reiterate the concerns raised in the Little Tokyo Community Council's letter – submitted to you via email:

- Nearby stakeholders have not had adequate time to review the draft EIR

Response to Comment No. ORG 1B-4

The comment states the public review period for the Draft EIR was inadequate. The original public review comment period was extended by the City to end on December 11,

2023. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter dated November 16, 2023 for further discussion of the Project's Draft EIR comment period extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines. The comment also states that the Draft EIR does not meet the standards articulated in the CEQA Guidelines for disclosure of a project's significant environmental effects. Refer to the Response to Comment Nos. 1B-5 to ORG 1B-14, which address the specific issues raised by the commenter related to the Project's significant impacts.

Comment No. ORG 1B-5

- The draft EIR does not adequately address the projects impact on cultural & historic resources – and egregiously does not recognize Little Tokyo as an adjacent cultural & historical district

Response to Comment No. ORG 1B-5

This comment states that the Draft EIR did not adequately address impacts to cultural historic resources, specifically Little Tokyo as an adjacent cultural and historical district. Refer to Response to Comment Nos. ORG 2B-5 and ORG 2B-6, which respond to comments pertaining to cultural and historic resources included in the LTCC letter dated December 8, 2023, referenced in the current comment letter. As stated therein, the Little Tokyo Historic District is separated from the North Site of the Project Site by approximately 1,850 feet, or more than 0.3 mile, with multiple streets and numerous intervening parcels, including a variety of low-to mid-rise buildings separating the Project Site from the Little Tokyo Historic District. Accordingly, due to the distance and intervening streets and buildings, there is no potential for the Project to materially impact the Little Tokyo Historic District or any of its contributing buildings, which were identified to be outside of the Study Area for the Project.

Comment No. ORG 1B-6

- The draft EIR incorrectly analyzes its impact on traffic in the area
- The project as proposed inadequately addresses issues of pedestrian and bicycle connectivity with adjacent communities

Response to Comment No. ORG 1B-6

This comment states that the Draft EIR did not adequately address traffic impacts and issues of pedestrian and bicycle connectivity with adjacent communities. Refer to Response to Comment Nos. ORG 2B-9 to ORG 2B-24, which respond to comments pertaining to transportation and pedestrian and bicycle connectivity with adjacent communities included in the LTCC letter dated December 8, 2023, referenced in the current comment letter. As discussed therein, the Draft EIR did adequately and correctly address all required transportation-related impacts, including VMT impacts and the Project's potential to conflict with a program, plan, ordinance, or policy addressing the

circulation system, including transit, roadway, bicycle, and pedestrian facilities, consistent with the applicable CEQA and City requirements. Section IV.J, *Transportation*, of the Draft EIR, appropriately concluded that the Project's transportation-related impacts would be less than significant without the need for mitigation.

Comment No. ORG 1B-7

- The draft EIR does not adequately address construction impacts of the project

Response to Comment No. ORG 1B-7

This comment states that the Draft EIR did not adequately address construction impacts. Refer to Response to Comment Nos. ORG 2B-29 to ORG 2B-32, which respond to comments pertaining to construction impacts included in the LTCC letter dated December 8, 2023, referenced in the current comment letter.

Comment No. ORG 1B-8

- The project as proposed does not provide adequate detail about publicly accessible open spaces – specifically types of amenities that will be provided for community members who do not live on-site, especially those who are unhoused

Response to Comment No. ORG 1B-9

This comment states that the Draft EIR did not provide adequate detail about publicly accessible open spaces. Refer to Response to Comment Nos. ORG 2B-33 to ORG 2B-36, which respond to comments pertaining to open space included in the LTCC letter dated December 8, 2023, referenced in the current comment letter.

Comment No. ORG 1B-9

- The draft EIR and project description do not provide any analysis of the shadow which the 40+ story tower will cast on the adjacent neighborhoods of Skid Row and Little Tokyo

Response to Comment No. ORG 1B-9

This comment states the Draft EIR did not analyze shadows that would be cast by the Project on adjacent properties. Shade and shadow effects are not required for evaluation under CEQA and are not addressed by the City's thresholds of significance, which are based on Appendix G of the CEQA Guidelines. Moreover, as discussed in the Project's Initial Study (Appendix A of the Draft EIR), PRC Section 21099(d) sets forth guidelines for evaluating project aesthetic impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." Furthermore, the related City of Los Angeles Department of City Planning

Zoning Information (ZI) No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA." As the Project is a mixed-use residential project on an infill Project Site within a TPA, PRC Section 21099 and ZI No. 2452 apply to the Project. Therefore, the Draft EIR appropriately did not analyze shadows created by the Project. See also, the Project modifications described in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which include reducing the height of Building 2 (on the North Site) from 44 stories to 30 stories.

Comment No. ORG 1B-10

- The draft EIR does not adequately address displacement concerns - particularly the indirect displacement of residents in the adjacent neighborhood and businesses in the adjacent neighborhood

Response to Comment No. ORG 1B-10

This comment states that the Draft EIR does not adequately analyze the potential impacts of indirect displacement of residents and businesses in the adjacent neighborhood. The comment does not raise any potential significant environmental impacts of the Project or present any substantial evidence that the Project will cause physical impacts to the environment. CEQA does not treat a project's social and economic effects (such as indirect displacement of adjacent uses) as significant environment impacts (CEQA Guidelines Sections 15064 and 15131) or require that the EIR engage in speculation as to a potential future impacts (CEQA Guidelines Section 15145). As such, no further response is necessary.

Nevertheless, as described in Chapter II, *Project Description*, of the Draft EIR, with Project modifications described in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, and Section IV.H, *Population and Housing*, of the Draft EIR, the current Project Site does not include any residential units (see Draft EIR, pages II-6 and II-9). Rather, the Project Site is occupied by cold storage facilities that include warehouse and wholesale commercial buildings and associated office space, truck loading docks, and surface parking. Additionally, the business operator of the existing cold storage facilities on the Project Site is voluntarily ceasing operations. Therefore, the Project would not displace any residents or businesses from the Project Site. Instead, the Project would provide a variety of new uses, including affordable housing, on a 7.6-acre site that currently does not include any residential or commercial uses.

Due to its location in an urban infill area in close proximity to transit, the Project would help the City achieve several regional goals regarding land use patterns and targeted growth. As identified on pages V.F-14 and, IV.F-19 in Section IV.F, *Land Use, and Planning*, of the Draft EIR, the Project Site is located within the Greater Downtown

Housing Incentive Area, which was created to incentivize housing development within the boundaries of the area. The Project is also located within a City-defined TPA and SCAG-defined High Quality Transit Area (HQTA), where redevelopment and growth are encouraged.

Additionally, consistent with the requirements of Appendix G of the CEQA Guidelines, the Draft EIR analyzed whether the Project would cause a significant environmental impact due to a conflict with land use regulations. Specifically, pages IV.F-21 to IV.F-38, in Section IV.F, *Land Use and Planning*, of the Draft EIR, include a detailed analysis of potential land use impacts resulting from the Project's inconsistency with applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect Further details regarding the Project's consistency with specific policies and goals is included in Appendix F of the Draft EIR, Land Use Plans and Policies: Project Consistency Tables. As explained therein, rather than displacing existing residents and businesses, the Project would enhance the livability of the adjacent neighborhood by redeveloping the Project Site with a high-quality mix of uses that would eliminate blight, provide a safe environment, improve adjacent streets and sidewalks, support land use and development standards that promote compatibility of uses, include sustainable features, and provide usable open space accessible to the public.

Furthermore, pages IV.F-30 and IV.F-40, in Section IV.F, *Land Use and Planning*, of the Draft EIR, identified that cumulative land use impacts resulting from the Project and related projects that are planned or are under construction within Downtown Los Angeles would be less than significant. As explained in the cumulative impact analysis, the area surrounding the Project Site is comprised of historically industrial and manufacturing-oriented properties, many of which are recently experiencing changes in land use through adaptive reuse, infill development, and redevelopment, including residences, office, and live/work uses, as well as retail, galleries and museums, studios, restaurants, and bars. The Project, together with the related projects, would enhance the community and surrounding neighborhood by providing a range of much-needed housing and employment opportunities in Downtown Los Angeles.

Comment No. ORG 1B-11

In addition to the above comments - which were documented in more detail in the aforementioned letter from the Little Tokyo Community Council, LTSC has the following concerns about the project:

- **Affordable Housing** - While the developer has committed to providing the minimum number of affordable units required by virtue of Measure JJJ, they have not provided any information about the actual affordability level or committed to numbers of affordable units. As an affordable housing developer, we know that "affordable housing" – even within the parameters of Measure JJJ– can vary widely in terms of income targeting. For example, in a neighborhood such as Skid Row, a so-called affordable unit, which can be set as affordable to someone

earning 80% of the Area Median Income (AMI), may be well above the market rate for the existing community – consequently leading to gentrification and indirect displacement of lower income residents. Without further information regarding the actual number and affordability levels of these units, it is impossible to accurately estimate the extent of the displacement that this project will trigger. ***Furthermore, given the extent of the local affordable housing crisis and the fact that this project is located in the neighborhood of Skid Row – a neighborhood where this crisis is felt MOST acutely –we urge the planning department to require a higher # of deeply targeted affordable housing units from this development.***

Response to Comment No. ORG 1B-11

This comment states that the Draft EIR does not provide sufficient information regarding the Project's affordable housing units and requests the City to require the Project to provide a higher number of deeply targeted affordable housing units.

Measure JJJ provides varying affordable housing requirements for rental and for-sale development projects. Rental projects that are subject to Measure JJJ must provide at least 5 percent of the total units as affordable to Extremely Low-Income households and either 11 percent of the total units as affordable to Very Low-Income households or 20 percent of the total units as affordable to Low Income households. Measure JJJ requires for-sale projects to provide at least (i) 11 percent of the total units as affordable to Very Low-Income households, (ii) 20 percent of the total units as affordable to Low-Income households, or (iii) 40 percent of the total units as affordable to Moderate-Income households.

As noted on page IV.H-11 of the Draft EIR, developers are required to make as much as 20 percent of the units in a project affordable for low-income and moderate-income renters. However, due to the different affordable housing requirements set forth in Measure JJJ, that number can be as high as 40 percent for homes that are for sale.

Consistent with Measure JJJ and the range of affordability levels outlined therein, the Project would set aside 5 percent of all rental units for Extremely Low-Income households, and between 11 percent and 40 percent of the remaining units would be set aside for Very Low-Income, Low-Income, and/or Moderate-Income households. The Project's residential component would include for-sale and rental units, which would be subject to an enforceable Condition of Approval and a restricted covenant for a period of 55 years to ensure continued affordability. Therefore, as required by Measure JJJ, the number and affordability level of the Project's affordable housing units would be determined at building permit issuance and would be based on the Project's total rental and for-sale unit count.

The State of California Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs based on local area median income (AMI). The income limits are updated annually to reflect changes in

median family income levels for different size households. Given the changing AMI, the affordable housing rates would be determined by the Los Angeles Housing and Investment Department (HCIDLA) at the time the covenant is recorded.

The Project would develop a variety of new uses that would provide employment opportunities and affordable housing for Extremely Low-Income households. Therefore, the Project would not lead to gentrification and indirect displacement of lower income residents but would enhance the livability of the adjacent neighborhood by redeveloping the Project Site with a high-quality mix of uses that would eliminate blight and provide a safe environment for all income levels, including Extremely Low-Income, Very Low-Income, and Low-Income households.

With the addition of housing at the Project Site, the Project would reduce the need to construct housing elsewhere while meeting the City's need for additional housing. Providing new housing within the City, especially on a site where there is currently no housing, would help meet growing population needs within the existing urban area.

Comment No. ORG 1B-12

- **Meaningful Community Benefits** - The developer has made several presentations to local community members about this project. But to our knowledge, they have not been clear or direct about how this project will benefit the Little Tokyo community or the Skid Row community. This project will have an undeniable impact on both of these legacy neighborhoods. It is imperative that current members of these communities, who have worked hard to sustain their respective communities, are able to concretely benefit from this project. ***We urge the Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package.***

Response to Comment No. ORG 1B-12

This comment requests information about the Project's benefits to the community. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Nevertheless, with Project modifications described in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, the Project proposes to enhance the area by introducing a cohesive mix of residential, retail/commercial, office, and community uses on an industrial infill site that is located near a major transit stop. As described on pages II-11 and II-12 in Chapter II, *Project Description*, of the Draft EIR, the Project would directly benefit the community by redeveloping the underutilized Project Site with a high-quality mixed-use development that includes new multi-family housing at varying income levels, office, retail, 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. See Response to Comment No. ORG 1B-11 for more details of the Project's affordable housing component. Also, see Response to Comment No. AG 5-6 for a description of the Project's features that promote walkability in and around the Project Site.

The Project would benefit the community by creating new opportunities for housing and economic growth. The Project, with design modifications, would provide 1,589 new residential dwelling units at varying affordability levels on a site where there is currently no housing. Further, the Project's variety of commercial uses would create new opportunities to strengthen the commercial viability of the neighborhood by increasing jobs and revenue-producing uses on the Project Site.

As described on pages II-37 through II-44 of the Draft EIR, the Project would significantly enhance the area with new pedestrian amenities and open space improvements. The Project would provide 90,113 square feet of open space that would be available to the public. Specifically, there would be a total of 12 individually curated publicly-accessible open space areas with amenities, such as dining patios, seating areas, bike racks, gardens, art installations, and pedestrian plazas. In addition to significant landscape and streetscape features, the Project would plant 439 new trees. Therefore, the Project would significantly benefit the community by promoting revitalization of an area historically characterized by industrial uses.

Comment No. ORG 1B-13

This project is completely out of context with the surrounding communities of Little Tokyo and Skid Row – both in terms of its massive scale as well as its character. The proposed project will endanger the adjacent neighborhoods and overshadow the nearby area: putting residents, businesses, non-profits, other organizations and religious institutions at risk of displacement.

Response to Comment No. ORG 1B-13

The comment states that the Project would be out of context with the surrounding communities and risk displacement of residents, businesses, other organizations and religious institutions. In regard to the potential to risk of displacement, this comment does not raise any specific issues regarding the content or adequacy of the Draft EIR or present any substantial evidence that the Project will cause physical impacts to the environment. According to CEQA Guidelines Sections 15064 and 15131, CEQA does not treat economic and social changes resulting from a project as significant effects on the environment. As such, no further response is necessary.

The Draft EIR analyzed whether the Project would cause a significant environmental impact due to a conflict with land use regulations. Specifically, Section IV.F, *Land Use and Planning*, of the Draft EIR, evaluated whether the Project would conflict with the City's land use policies, including the Framework Element, which sets forth a Citywide

comprehensive growth strategy and establishes policies regarding land use, housing, urban form, neighborhood design, and economic development. Many of the applicable land use policies address compatibility amongst neighboring land uses, as discussed below.

The City's land use policies, which discuss protecting neighborhoods from buildings of contrasting scale, generally refer to established low-rise residential neighborhoods, in which a multi-story building can create a stark contrast and affect the uniformity of a neighborhood street. As discussed on page IV.F-23 of the Draft EIR, the Project would not physically divide an established community because the Project would be an infill development providing uses that are consistent with the development of mixed-use projects in the surrounding area.

As explained on page IV.F-20 of the Draft EIR, which has been modified in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, the Project Site is located adjacent to the Arts District, which has experienced an increased demand for new retail, 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/light industrial structures are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses. The Project's proposed buildings and architectural character would be consistent with the highly urbanized and evolving character of the surrounding area.

The Project's buildings, inclusive of its reduced maximum building height of 30 stories, would be consistent with the multi-story, mixed-use character of the Project Site's location within the designated Downtown Center and the adjacent Little Tokyo/Arts District neighborhoods and would not encroach into any existing residential neighborhoods. The architectural variety of building design, building heights and architectural treatment, mix of uses, provision of street-to-street paseos, and publicly-accessible, landscaped open space would enhance the character of the Project Site and the surrounding commercial/industrial area and thus, would not conflict with policies that require new development to maintain the prevailing scale and character of the City's stable neighborhoods.

Regarding the commenter's statement that the Project would overshadow the nearby area, shade and shadow effects are not required for evaluation under CEQA and are not addressed by the City's thresholds of significance, which are based on Appendix G of the CEQA Guidelines. Furthermore, the Project Site is located within a TPA as designated by the City in response to Senate Bill (SB) 743 (refer to Response to Comment No. ORG 1B-9). Therefore, the issue of building scale and height is not an environmental effect under CEQA pursuant to PRC Section 21099.

In addition, while the Project would not result in significant aesthetics or off-site land use impacts, the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR. These modifications

are shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories while increasing the height of Building 6 (on the South Site) from six stories to 26 stories, and to reduce the residential density/unit count in Building 2 from 449 units to 335 units, a reduction of 114 units. Additionally, the hotel component (68 rooms) in Building 6 has been removed. With the conversion of the 68 hotel rooms to residential units, as well as the transfer of 114 units from Building 2 to Building 6, the residential unit count in Building 6 has increased from 68 units to 250 units. Overall, the Project's unit count has been increased from 1,521 units to 1,589 units. Also, the amount of restaurant and retail space within Building 1 has been increased from 16,378 square feet to 61,038 square feet. As such, the Project's overall amount of restaurant/retail square footage has been increased from 101,088 square feet to 145,748 square feet.[14] Within Building 1, the 44,660 square feet of residential floor area (which was previously designated for residential amenity space) would be removed to accommodate the increase in restaurant and retail square footage. With these modifications, the Project's overall floor area (2,318,534 square feet) would remain the same as analyzed in the Draft EIR. The Project's total parking count has also been reduced from 2,475 spaces to 2,444 spaces. Relevant figures from the Draft EIR have also been revised to illustrate the Project design modifications summarized above. As the comment does not raise any specific issues regarding the content or adequacy oof the Draft EIR, no further response is necessary.

Comment No. ORG 1B-14

Given the disproportionately negative impact which the project will have on two historic communities of color – both of which have borne the brunt of decades of systemic racism in City Planning, if the Planning Department is to follow its stated goal of racial equity, it must follow the lead of those who are most affected by this project and ensure that the developer is responsive to these clearly articulated community concerns.

Response to Comment No. ORG 1B-14

This comment states that the Draft EIR needs to address historical racism by requiring the developer to be responsive to community concerns. According to CEQA Guidelines Sections 15064 and 15131(a), CEQA does not require analysis of social and economic effects as significant environment impacts. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is

[14] 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 Project's retail/restaurant uses, the environmental analyses included in Chapter IV, *Environmental Impact Analysis*, of the Draft EIR, evaluates a total of 158,225 square feet of restaurant/retail uses. It is assumed that there would be 67,595 square feet of retail uses and 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

necessary. Nevertheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 1B-15

Thank you for your consideration of these comments. I look forward to reviewing the revisions to the Draft EIR.

Response to Comment No. ORG 1B-15

The comment closes the comment letter but does not address the adequacy of the evaluation provided in the Draft EIR. As such, no further response is necessary.

Comment No. ORG 1B-16

Attachment

Copy of Letter from Little Tokyo Community Council (LTCC) dated December 8, 2023.

Response to Comment No. ORG 1B-15

Responses to the LTCC letter dated December 8, 2023 are provided in Responses to Comment Nos. ORG 2B-2 to ORG 2B-42. Please refer to responses therein, which address comments in LTCC's letter.

Comment Letter No. ORG 2A

Little Tokyo Community Council
Kristin Fukushima, Managing Director
Received November 3, 2023 and November 6, 2023

Comment No. ORG 2A-1

My name is Kristin Fukushima, and I'm with the Little Tokyo Community Council. On behalf of LTCC, we are formally requesting that the city extend the public comment period so as to allow the community an appropriate amount of time for reading through the lengthy document, digesting its contents, and having time to process concerns, questions, and more.

Given the size and scale of this project, it is important that the community have time to properly engage during the official public comment period. We therefore are requesting the public comment period be extended as much as it possibly can be - please see our attached letter for reference, and thanks in advance for your consideration.

Response to Comment No. ORG 2A-1

This comment requests an extension of the time to comment on the Draft EIR. The following response was provided to the comment by Los Angeles Department of City Planning Staff on November 6, 2023:

> *Thank you for your email. Regarding your request for a time tension, [sic] because the Project and its associated environmental review has been consistent with both LAMC and CEQA requirements, at this time we have not identified any unusual circumstances that would warrant an additional extension. Please keep in mind that while the Draft EIR comment period ends on November 27, 2023, written public comment is welcome at point in time up until the Project goes before a decision-maker. Any and all public comments will be included in the Project's case file and will be provided for review by any associated decision-making bodies.*
>
> *Thank you for your email, and please do not hesitate to contact me if you have any further questions.*

Nonetheless, the original public review comment period was extended by the City to end on December 11, 2023. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter dated November 16, 2023 for further discussion of the Project's Draft EIR comment period extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines.

Comment No. ORG 2A-2

Thank you for your response. I realized I did not attach the letter on Friday - it is now attached.

Response to Comment No. ORG 2A-2

The following response was provided to the comment by Los Angeles Department of City Planning Staff on November 7, 2023:

> *Thank you for sending the letter along with your comment. Unfortunately, however, we have not identified any unusual circumstances that would warrant an additional extension. Please note that you may still submit public comments at any point after November 27, 2023, up until the Project goes before a decision-maker.*

As discussed in Response to Comment No. ORG 2A-1, the comment period was extended to end on December 11, 2023.

The attached letter dated November 2, 2023 referenced in the comment is included as Comment No. ORG 2A-3.

Comment No. ORG 2A-3

On behalf of the undersigned organizations, we submit this request for an extension to the provided 45-day public comment review period for the Draft Environmental Impact Report ("DEIR") on the proposed mixed-use Fourth & Central Project at 400 S. Central Avenue, Case No. ENV-2021-4071-EIR.

The community groups collectively making this request represent a diverse cross-section stakeholders in the neighborhood immediately adjacent to the proposed project and will be those most impacted by any new development at this location. We work with stakeholders who speak many different languages other than English – many of whom are unfamiliar with this specific project as well as the overall development process. An inclusive, thoughtful review period of this draft EIR document absolutely necessitates an extension of the public comment period.

The **Japanese American National Museum**, which is located in Little Tokyo, was founded in 1985 and is dedicated to preserving the history and culture of Japanese Americans. In addition to being a world-class museum, JANM is also a social justice institution and committed to preserving the cultural and historical legacy of Little Tokyo as a gateway neighborhood for communities of color in the region.

Little Tokyo Service Center (LTSC) is a 40+ year old organization focused on providing a comprehensive array of social welfare and community development services to assist low- income individuals and other persons in need in Little Tokyo and throughout the Los Angeles region. LTSC provides direct social services to low income seniors, unhoused

people, small businesses, and families in the neighborhood. They also conduct community organizing around land-use policy & housing justice issues in and around Little Tokyo

Nikkei Progressives is a grassroots, all-volunteer, multi-generational community organization. Their mission is to engage and unite the Nikkei community to stand against injustice, inequality, and white supremacy and to work in solidarity with others for a more just society.

Public Counsel is a nonprofit public interest law firm dedicated to advancing civil rights and racial and economic justice, as well as to amplifying the power of our clients through comprehensive legal advocacy. Founded on and strengthened by a pro bono legal service model, our staff and volunteers seek justice through direct legal services, promote healthy and resilient communities through education and outreach, and support community-led efforts to transform unjust systems through litigation and policy advocacy in and beyond Los Angeles.

Sustainable Little Tokyo is a community driven initiative working to ensure a healthy, equitable, and culturally rich Little Tokyo for generations to come. SLT began in 2013 as a multi-day community visioning effort and has evolved into a holistic, neighborhood-wide campaign to promote the environmental, economic, and cultural sustainability of Little Tokyo.

Visual Communications was founded in 1970 and was the first non-profit organization dedicated to an honest and accurate portrayals of Asian Pacific American peoples, communities, and heritage through the media arts. Based in Little Tokyo, they have a unique ability to tell the story of this community and a vested interest in the future of this place.

The California Environmental Quality Act ("CEQA") requires a transparent and engaging public review process, and it strongly emphasizes the importance of public comments and participation. The proposed project is of a nearly unprecedented size and scale for the immediate surrounds. It encompasses over 7.5 acres, would require demolition of existing structures, and would develop 10 different buildings totaling over 2 million square feet of floor area of a wide mix of uses including residential, office, retail, restaurant, hotel, open space, and both subterranean and above-grade parking. Furthermore, the project is requesting significant discretionary approvals from the City and would dramatically alter the underlying General Plan land use designation and zoning of the site. These proposed significant changes and their potential impacts require the careful consideration of the public.

The DEIR released is over 1,000 pages in length, not including the over 3,000 pages of substantive appendices. As of the writing of this request, two of the Appendices (E. and I.) are inaccessible on the City's website and therefore not reviewable by the public.[1] The surrounding community is diverse, speaking languages other than English and with a wide range of backgrounds in land use, planning, and real estate development. However, the community is clear in its interest in understanding all of the potential impacts this

proposed project will have on their neighborhood and lives. Given that the DEIR is not made available in other languages and is a highly technical document, community organizations – many of whom are submitting this extension request – will bear the burden of translating the document, both into multiple non-English languages and into more accessible and understandable vocabulary for our diverse residents and constituents.

Therefore, the current allocated time period for public review and comment is insufficient to allow for adequate and meaningful public review, analysis, and preparation of comments on this proposed development of much concern to the community.

As such, we respectfully request that the public comment period be extended to allow for a 90- day total public comment period -- excluding the Thanksgiving, Christmas, and New Year's holidays -- resulting in a new deadline of January 15, 2024.

Respectfully, Ann Burroughs

President & CEO, Japanese American National Museum

Erich Nakano

Executive Director, Little Tokyo Service Center

Nikkei Progressives

Faizah Malik

Supervising Senior Staff Attorney, Public Counsel

Celeste Shimoura Goedert

Director of Sustainable Little Tokyo

Frances Cullado

Executive Director, Visual Communications

[1] Receive Server Error message 404 – File or directory not found. The resource you are looking for might have been removed, had its name changed, or is temporarily unavailable.

Response to Comment No. ORG 2A-3

The comment requests an extension of the Draft EIR comment period. The original public review comment period was extended by the City to end on December 11, 2023. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter dated November 16, 2023 for further discussion of the Project's Draft EIR comment period extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines.

In addition, the commenter indicates that two of the Draft EIR appendices were inaccessible on the City's website and, therefore, not reviewable by the public at the time of the comment letter preparation. These two appendices, the Paleontological Resources Assessment (Appendix E) and Public Service Correspondence (Appendix I), were immediately corrected to be accessible on the City's website in early November 2023. Furthermore, hardcopies of the entire Draft EIR, including all appendices, were made available at three public libraries, as well as at the City's Department of Planning office by appointment since the beginning of the public comment period. As stated on the Notice of Availability and Notice of Extension documents, "If you are unable to access digital copies of the Draft EIR, the Department will attempt to make reasonable arrangements to view the documents. In addition, physical copies of the Draft EIR and case file can still be viewed at City offices. The Department has implemented additional measures to ensure the safety of the public viewing physical case files, necessitating appointments."

The remaining sections of the comment letter identify the community groups collectively making the request for extension, which does not address the adequacy of the Draft EIR. As such, no further response is necessary.

Comment Letter No. ORG 2B

Little Tokyo Community Council
Kristin Fukushima, Managing Director
Received December 8, 2023

Comment No. ORG 2B-1

I hope this finds you well. Please see attached for LTCC's public comment letter on the 4th/Central Cold Storage Project (ENV-2021-4071-EIR). If you or others copied here on this email have any questions, please do not hesitate in reaching out to us.

Response to Comment No. ORG 2B-1

The comment references a comment letter by LTCC dated December 8, 2023. Responses to LTCC's December 8, 2023 are provided in Response to Comment Nos. ORG 2B-2 to ORG 2B-42.

Comment No. ORG 2B-2

On behalf of the Little Tokyo Community Council (LTCC), we submit these comments on the Draft Environmental Impact Report (DEIR) for the Fourth and Central Project.

Established in 1999, the LTCC is a non-profit community coalition with broad representation of residents, businesses, religious, cultural, and community organizations as well as other vested stakeholders in the Little Tokyo community. LTCC has 65 member organizations as well as over 40 individual stakeholder members. We work to protect, promote, and preserve Little Tokyo, a recognized cultural and historic district. Little Tokyo is an important cultural and business center for Japanese Americans in Southern California, and has existed for 139 years. Little Tokyo is significant in that it is one of only three remaining Japantowns in the United States.

The California Environmental Quality Act (CEQA) requires full disclosure of a project's significant environmental effects so that decision-makers and the public are informed of these factors before the project is approved to ensure that government officials are held accountable for any consequences.[1] The Environmental Impact Report (EIR) process is the "heart of CEQA" and is the chief mechanism to effectuate its statutory purposes.[2] An EIR is an "environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return."[3] The EIR must not be obscure or incomplete.[4] An EIR that is confusing or self-contradictory is inadequate.[5] Courts have also emphasized that an EIR cannot be merely conclusory.[6]LTCC's members and partners have reviewed the Draft EIR as carefully as possible during the limited public comment time frame. We have hosted several community meetings to discuss concerns with the Project and consulted planning and legal experts to better understand the Project and how it will affect our community. These comments are being submitted on behalf of LTCC's members as well

as the 75+ community members who have participated in our public meetings and workshops. Our conclusion is that for the following reasons, the Draft EIR as submitted does NOT meet the standards articulated in the aforementioned requirements of CEQA:

[1] *Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 392 ("Laurel Heights").

[2] *In Re Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal. 4th 1143, 1162.

[3] *Laurel Heights*, supra, 47 Cal. 3d at 392 (quoting Santiago County Water DiStreet v. County of Orange (1981) 118 Cal. App. 3d 818, 822)

[4] *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 443.

[5] *San Joaquin Raptor Center v. County of Merced* (2007) 149 Cal. App. 4th 645, 656 fn. 4.

[6] *See Citizens of Goleta Valley*, supra, 52 Cal.3d at 568-569 ("As we have frequently observed, it is only the EIR that can effectively disclose to the public the 'analytic route the ... agency traveled from evidence to action.'...In general 'the EIR must contain facts and analysis, not just the agency's bare conclusions or opinions.'") (citations omitted).

Response to Comment No. ORG 2B-2

This comment provides background information about the LTCC and indicates that LTCC staff have worked closely with local stakeholders to develop comments on the Draft EIR for the Project. The comment provides an introduction to additional comments that indicate that the Draft EIR does not meet the standards and requirements established by CEQA. The comment does not raise any specific issues regarding the content or adequacy of the Draft EIR; however, as discussed in the responses to comments below, none of the comments raised in this comment letter provide substantial evidence that the Project will cause physical impacts to the environment not disclosed in the Draft EIR as required by CEQA or that the Draft EIR is otherwise deficient under CEQA.

Comment No. ORG 2B-3

LACK OF ADEQUATE TIME TO REVIEW:

Our community has not been afforded adequate time to review the Draft EIR. As stated in our original request for an extension[7] of the public comment period, Little Tokyo is a neighborhood full of diverse stakeholders – many of whom are elderly or have limited English proficiency. The size and scale of this project is unprecedented and merits careful review by all neighboring community members. This DEIR is over 1,000 pages in length, not including 3,000+ pages of substantive appendices – two of which (Appendices E & I) were not available on the City's website (and thus not reviewable by the public) until late November – well into the public comment period. In addition, the original deadline for public comments to this Project's Draft EIR was the day after the Thanksgiving break. We argued this was an unreasonable deadline, presenting undue challenges to families, businesses, and workers in Little Tokyo.

Given the inadequate review time, we scrambled to meet with community members to educate them about the project, and grapple with its implications. This letter represents

our best attempts at analyzing and documenting the environmental impacts of the project in the time available. However we fear that it may not capture all of the negative environmental impacts of this project.

In the future, the City of Los Angeles should provide additional time for the public to review EIR documents, in particular for larger developments such as the 4th & Central Project, and when the Project is located in, or adjacent to, an Environmental Justice community. In addition, the public comment periods should not overlap with national holidays, as it presents an undue burden on the public, and the timing is an unfair advantage to Project developers.

[7] Submitted to Tamar Gharibian via email by Kristin Fukushima on Nov. 6, 2023 "LTCC Request for ENV-2021-4071-EIR Public Comment Extension"

Response to Comment No. ORG 2B-3

The comment states the public review period for the Draft EIR was inadequate. The original public review comment period was extended by the City to end on December 11, 2023. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter dated November 16, 2023 for further discussion of the Project's Draft EIR comment period extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines. Additionally, the comment asserts that the CEQA review periods are inadequate for large projects located in, or adjacent to, an environmental justice community and that public comment periods should not overlap with national holidays; therefore, the City should extend the statutory time limits for future projects. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 2B-4

CULTURAL AND HISTORIC RESOURCES

The Draft EIR both incorrectly characterizes Little Tokyo and failed to include its impacts on the cultural and historic resources of the Little Tokyo neighborhood, which is adjacent to the Project.

I. In section II-11, the DEIR states: "*The Project Site is also situated just south of the Little Tokyo neighborhood, where numerous former warehouse structures are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses*."

    A. This description is completely inaccurate. There are no former warehouse structures being converted in Little Tokyo. Little Tokyo is a thriving neighborhood with existing restaurants, small businesses, museum and arts/culture institutions, apartment buildings and condos. It has existed as an important cultural and business center for Japanese Americans in

Southern California for nearly 140 years, hosting many significant cultural celebrations such as the Nisei Week Japanese Festival. Its businesses and restaurants are not only neighborhood serving, they attract tourists from across Southern California and internationally as well. The description in the DEIR presumes the project is compatible with neighboring land uses when in fact, it is not. However, Little Tokyo is a unique cultural and historical district and, as the project seeks to take advantage of its proximity to high quality transit (i.e. the Metro Little Tokyo/Arts District Regional Connector station which is located in Little Tokyo) the project must accurately describe how it integrates into the surrounding communities of Little Tokyo, the Arts District and the L.A. River. New developments like this proposed project should acknowledge and integrate into the existing historic and cultural context of Little Tokyo as much as possible.

Response to Comment No. ORG 2B-4

The comment makes reference to a description in a subsection named *Surrounding Land Uses*, in Chapter II, *Project Description*, of the Draft EIR. This description was carried forward from the Project's Initial Study dated March 2022, where projects such as LTSC's Umeya project were contemplated, which is located at the intersection of the Little Tokyo and Skid Row neighborhoods and would redevelop the Umeya Rice Cake Company factory and warehouse into a transit-oriented, mixed-use development featuring 175 affordable apartments. Nonetheless, this sentence has been clarified in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, to add inclusion of the Arts District along with the Little Tokyo neighborhood, where warehouses and other manufacturing/industrial buildings are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses. However, this clarification does not affect or change the analysis of cultural and historic resources included in Section IV.B, *Cultural Resources*, of the Draft EIR. See Response to Comment Nos. ORG 2B-5 and ORG 2B-6, which address specific comments on the cultural resources analysis in the Draft EIR.

Comment No. ORG 2B-5

II. In section IV-B [sic] Cultural Resources, there is no mention of Little Tokyo as a historic community in the Cultural Resources section of the DEIR. The study area only includes Fifth Street SRO Hotel Historic District and Downtown Los Angeles Industrial Historic District. The Draft EIR has failed to consider the impact on the Little Tokyo neighborhood which is adjacent to the Project on the north side. The Little Tokyo Historic District is a recognized National Historic Landmark[8]. It is also one of 14 California Cultural Districts recognized by the California Arts Council[9]. In addition, the Project is 785 feet away from a recognized cultural and historical resource – the Higashi Honganji Buddhist Temple, which the DEIR also failed to recognize and consider the Project's impact to.

[8] https://www.nps.gov/places/little-tokyo-historic-district.htm
[9] https://www.caculturaldistricts.org/little-tokyo

Response to Comment No. ORG 2B-5

This comment states that the Draft EIR did not adequately address impacts on the Little Tokyo neighborhood and the Higashi Honganji Buddhist Temple. As noted in the Draft EIR, Section IV.B, *Cultural Resources*, and the Historic Resources Technical Report included as Appendix C-1 to the Draft EIR (Draft EIR Appendix C), the area surrounding the Project Site contains a number of designated and previously identified historical resources. However, according to CEQA Guidelines, Section 15064(d)(1) to 15064(d)(3), only those historical resources in proximity to the Project Site that have "a reasonably foreseeable" potential to be substantially impacted by the Project, either through direct impacts as a result of construction activity, or indirectly due to changes in the setting are considered in evaluating the potential environmental effect of the Project on the environment. Further, as outlined in the Draft EIR, CEQA Guidelines Section 15064.5(b)(1) defines a substantial adverse change as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired." A change in the setting of a historical resource, on its own, does not represent a substantial adverse change to the historical resource; rather, it must be shown that the historical resource would be materially impaired such that it could no longer convey its significance.

Therefore, although there are number of designated and previously identified historical resources in the area of the City, where the Project is located, based on the CEQA Guidelines, the Study Area includes only those historical resources that have a reasonably foreseeable potential to be materially impaired by the Project. Potential impacts to the potential Downtown Industrial Historic District and the potential Fifth Street SRO Historic District are evaluated in the Draft EIR due to their immediate proximity to the Project Site and the reasonably foreseeable potential for direct or indirect impacts to those potential districts.

The Little Tokyo Historic District was designated in 1995, recognizing its significance as the oldest commercial and cultural center of Little Tokyo in Los Angeles. The district is composed of nine contributing buildings generally bounded by 301-349 East First Street, 110-120 Judge John Aiso Street, and 119 Central Avenue.[15] The Little Tokyo Historic District is separated from the North Site of the Project Site by approximately 1850 feet, or more than 0.3 mile, with multiple streets and numerous intervening parcels, including a variety of low-to mid-rise buildings. Due to the distance and intervening streets and buildings, there is no reasonably foreseeable potential for the Project to materially impact the Little Tokyo Historic District or any of its contributing buildings such that they would

[15] National Historic Landmark Nomination, Little Tokyo Historic District, May 7, 1993,

no longer convey their significance; accordingly, the Little Tokyo Historic District and any of its contributing buildings were identified to be outside of the Study Area for the Project.

The Higashi Honganji Buddhist Temple, constructed in 1976 and located at 505 E. Third Street, was identified as potentially eligible for State and local designation by SurveyLA for representing "an important association with an ethnic/cultural group or groups in Los Angeles."[16] However, the Higashi Honganji Buddhist Temple is located approximately 785 feet from the Project Site, with intervening structures along both sides of Central Avenue, including the Little Tokyo Market and the Centenary United Church on the east side of Central Avenue and various commercial/light industrial buildings on the west side of Central Avenue. Between these intervening structures and the Temple is the intersection of 3rd Street and Central Avenue. Due to the intervening streets and buildings, there is no reasonably foreseeable potential for the Project to materially impact the Higashi Honganji Buddhist Temple such that it would no longer convey its significance. Accordingly, it was identified to be outside of the Study Area for the Project.

The Draft EIR appropriately considered the potential for indirect impacts to historical resources in the Study Area, and the analysis and conclusions in the Draft EIR were consistent with CEQA Guidelines. Despite the addition of new height and density in the area as proposed by the Project, there would be no substantial adverse change on historical resources in the Study Area such that they could no longer convey their historical significance. Therefore, there is no potential for indirect impacts to historical resources outside the Study Area which, as explained above, are separated from the Project Site by multiple streets and/or numerous intervening parcels.

Nonetheless, while the Project would not result in significant indirect impacts to the Little Tokyo Historic District or the Higashi Honganji Buddhist Temple, the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR. These modifications are shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories, while increasing the height of Building 6 (on the South Site) from six stories to 26 stories, and reduce the residential density/unit count in Building 2 on the North Site from 449 units to 335 units, a 114-unit reduction.

Comment No. ORG 2B-6

A. The mass and scaling of the project and its proximity to cultural and historical resources of Little Tokyo, presents a direct and indirect negative impact. Although Little Tokyo was not included in the Cultural Resources analysis, the Draft EIR, in describing the Project's impact on the nearby Fifth Street SRO Hotel Historic District, states: (IV.B-43) "*However, the Project would add significant height to the skyline in an area that is primarily low-density in character and would therefore alter the wider surroundings of the*

16 City of Los Angeles, SurveyLA, Higashi Honganji Buddhist Temple, January 2024.

potential historic district and potentially compromise the integrity of setting of the potential historic district."

1. This statement underscores our belief that the height of the buildings in the Project will significantly alter and compromise the integrity of the setting as it relates to surrounding cultural and historical resources, located in Little Tokyo. The DEIR has failed to include Little Tokyo in its Cultural/Historic Resources analysis, and therefore the developer should study both direct and indirect impacts to Little Tokyo, including a shade and visual impact study on adjacent buildings and cultural/historic neighborhoods, as well as analysis of alternative massing possibilities on the site. Without detailed studies and analysis of the proposed buildings, the public is unable to effectively understand the full impact of this project on its surroundings.

Response to Comment No. ORG 2B-6

This comment states that the Draft EIR should analyze historic impacts to Little Tokyo and analyze both direct and indirect impacts, including a shade and visual impacts, as well as massing. As noted in the Draft EIR and the Historic Resources Technical Report included as Appendix C-1 to the Draft EIR (Draft EIR Appendix C) and consistent with the CEQA Guidelines, historical resources in proximity to the Project Site that have "a reasonably foreseeable" potential to be substantially impacted by the Project, either through direct impacts as a result of construction activity, or indirectly due to changes in the setting are considered in evaluating the potential effect of the Project on the environment. As defined by the National Park Service, setting is the physical environment of a historical resource and refers to the character of the place in which the property played its historical role.[17] The area surrounding the Project Site has been sporadically developed over time and, as such, represents multiple periods of development, contains a variety of building types, and does not have a unified character.

As the commenter notes, in evaluating the potential impacts to the Fifth Street SRO Potential Historic District, which is immediately adjacent to the West Site of the Project Site, the Draft EIR acknowledges that the Project "would add significant height to the skyline in an area that is primarily low-density in character and would therefore alter the wider surroundings of the potential historic district and potentially compromise the integrity of setting of the potential historic district."[18] However, in order for this change to result in a substantial adverse impact, it must be shown that the Project would result in the "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be

17 U.S. Department of the Interior, National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (Washington D.C.: National Park Service, 1995), 44-45.

18 Historic Resources Technical Report, pg. 111.

materially impaired" pursuant to CEQA Guidelines Section 15064.5(b)(1). A change in the setting of a historical resource – either the immediate setting or the wider setting in the area – does not automatically represent a substantial adverse change to the historical resource. In order to represent a substantial adverse change to a historical resource, it must be shown that the historical resource would be materially impaired such that it could no longer convey its significance.

Consistent with the CEQA Guidelines, the analysis of potential indirect impacts to the Fifth Street SRO Potential Historic District appropriately concluded that "altering the wider setting outside the boundaries of the potential historic district would not result in a material change such that the potential district would no longer convey its historic significance."[19] The analysis further determined that the significance of the Fifth Street SRO Potential Historic District is conveyed by the physical characteristics and interrelationship of the potential district contributors. These characteristics would not be materially altered by proposed new construction outside the potential district boundaries, regardless of the height and density, and the overall historic development pattern in this area of the City would still be apparent.[20]

The Little Tokyo Historic District is located more than 0.3 mile from the North Site of the Project Site. Due to the distance, as well as multiple streets and numerous intervening parcels, including a variety of low-to mid-rise buildings, separating the Project Site from the Little Tokyo Historic District, and also due to the physical characteristics of the district and the surrounding area, even with the addition of a 44-story tower on the North Site, there is no potential for the Project to materially impair the Little Tokyo Historic District such that it could no longer convey its historic significance. Nonetheless, as described in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, the Project design has been modified to reduce the buildings to no more than 30 stories.

The Draft EIR appropriately considered the potential for indirect impacts to historical resources in the Study Area, which are located in the immediate Project vicinity, and the analysis and conclusions in the Draft EIR were consistent with CEQA Guidelines. Despite the addition of new height and density in the area as proposed by the Project, there would be no substantial adverse change on historical resources in the Study Area such that they could no longer convey their historical significance. Therefore, there is no potential for indirect impacts to historical resources outside the Study Area, which are separated from the Project Site by multiple streets and/or numerous intervening parcels. See Response to Comment No. ORG 2B-5 for additional discussion of impacts to historic resources in the area.

As stated previously, while the Project would not result significant indirect impacts to the Little Tokyo Historic District, the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR.

19 Historic Resources Technical Report, pg. 111.

20 Historic Resources Technical Report, pg. 111.

These modifications are shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories, while increasing the height of Building 6 (on the South Site) from six stories to 26 stories, and reduce the residential density/unit count in Building 2 on the North Site from 449 units to 335 units, a 114-unit reduction.

Comment No. ORG 2B-7

2. The Project has been exempted from studying Aesthetic and Parking impacts, in accordance with City of Los Angeles Department of City Planning ZI No. 2452 [Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA]. However, Section 21099(d)(1) of the Public Resources Code (PRC) (2) (B) states "*For the purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources."* Therefore, aesthetic impacts are relevant to this DEIR and should be examined.

Response to Comment No. ORG 2B-7

The comment states that aesthetic impacts are relevant to the Draft EIR and should be evaluated. The Draft EIR and its accompanying Initial Study comprehensively evaluated aesthetics impacts in accordance with CEQA and the applicable provisions of SB 743 (PRC Section 21099(d)), which sets forth guidelines for evaluating project transportation impacts under CEQA. The Project's Initial Study is included in Appendix A, Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and NOP and Scoping Meeting Comments, of the Draft EIR. The Project's Initial Study evaluated the Project's aesthetic impacts on pages 51 to 62 and concluded that aesthetics impacts would be less than significant or have no impact; thus, no further analysis in the Draft EIR was required. As discussed under Checklist Question I.b on page 54 of the Initial Study, since the Project Site is not located within a State scenic highway, the Project would have no impact on historical buildings within a State scenic highway. In addition, Section IV.B., *Cultural Resources*, of the Draft EIR, evaluated direct and indirect impacts in accordance with CEQA. As discussed in Response to Comment No. ORG 2B-6, there is no potential for indirect impacts to historical resources outside the Study Area, which are separated from the Project Site by multiple streets and/or numerous intervening parcels. The commenter is also referred to Response to Comment ORG 1B-13 included in the Little Tokyo Service Center letter dated December 12, 2023, which discusses how the Project's massing and scale would not cause a significant environmental impact due to a conflict with land use regulations that address compatibility amongst neighboring land uses.

Comment No. ORG 2B-8

As proposed and for reasons outlined above, the Project is incompatible in massing and scale with the Little Tokyo historic neighborhood. Mitigation should include reducing the heights of the proposed buildings to a size and scale consistent with its surroundings.

Response to Comment No. ORG 2B-8

This comment states that the Project is incompatible in massing and scale with the Little Tokyo historic neighborhood. The Draft EIR considered and analyzed the evidence regarding potential environmental impacts of the Project pursuant to applicable CEQA requirements. Refer to Response to Comment Nos. ORG 1B-13 and ORG 2B-4 to ORG 2B-7, which address the Project's compatibility with the Little Tokyo historic neighborhood.

Nonetheless, while the Project would not result in significant on- or off-site aesthetics impacts to the Little Tokyo historic neighborhood, the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR. These modifications are shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories while increasing the height of Building 6 (on the South Site) from six stories to 26 stories, and to reduce the residential density/unit count in Building 2 from 449 units to 335 units, a reduction of 114 units. Additionally, the hotel component (68 rooms) in Building 6 has been removed. With the conversion of the 68 hotel rooms to residential units, as well as the transfer of 114 units from Building 2 to Building 6, the residential unit count in Building 6 has increased from 68 units to 250 units. Overall, the Project's unit count has been increased from 1,521 units to 1,589 units. Also, the amount of restaurant and retail space within Building 1 has been increased from 16,378 square feet to 61,038 square feet. As such, the Project's overall amount of restaurant/retail square footage has been increased from 101,088 square feet to 145,748 square feet.[21] Within Building 1, the 44,660 square feet of residential floor area (which was previously designated for residential amenity space) would be removed to accommodate the increase in restaurant and retail square footage. With these modifications, the Project's overall floor area (2,318,534 square feet) would remain the same as analyzed in the Draft EIR. The Project's total parking count has also been reduced from 2,475 spaces to 2,444 spaces. Relevant figures from the Draft EIR have also been revised to illustrate the Project design modifications summarized above.

[21] 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 Project's retail/restaurant uses, the environmental analyses included in Chapter IV, *Environmental Impact Analysis*, of the Draft EIR, evaluates a total of 158,225 square feet of restaurant/retail uses. It is assumed that there would be 67,595 square feet of retail uses and 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

Comment No. ORG 2B-9

TRANSPORTATION

Through its analysis, the Project claims less-than-significant Vehicle Miles Traveled (VMT), which translates to less-than-significant traffic impacts and less-than-significant GHG emissions from traffic. However, we contend that the assumptions that the VMT calculations are based on are highly generalized and, as a result, that the transportation and GHG emissions impacts are grossly underestimated.

I. In IV.J-4, the Project Draft EIR states, "*Generally, land use projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor[3] should be presumed to cause a less than significant transportation impact*."

Furthermore, in IV.J-20, it states, "*The VMT thresholds identified in the TAG are further based on household VMT per capita and work VMT per employee. Thus, the VMT Calculator contains population assumptions based on Census data for the City and employment assumptions derived from multiple data sources*…"

We contend that the VMT analysis is insufficient and does not correctly characterize its future land use. The Project Description section pages II-37 to 40, includes many amenities included in the Proposed Project which are called out in the Displacement section of this letter. These amenities – with rooftop terraces, pools, meditation areas – are synonymous with luxury living developments. A report[10] by the Bay Area group Transform, citing analysis from the Center for Neighborhood Technology, found that households with High-Income, and even some Moderate-Income households who live within ¼ mile of High Quality Transit Areas have higher VMT than households that are Extremely Low-Income and Low-Income in the same area.

As the future land use and future residents are not correctly characterized, we contend that the Project Draft EIR's use of the VMT Calculator is insufficient to make reasonable assumptions that the luxury Project would facilitate transit use, even though it is within a Transit Priority Area.

A. Therefore, we ask that the VMT assumptions be re-analyzed by including the Income Thresholds of future tenants (Very Low, Low, Moderate, etc.) instead of by Housing Type.

B. In addition, we request that the Lead Agency include a VMT analysis that accounts for differing rates of car ownership amongst income levels for this Project.

[10] https://drive.google.com/file/d/1CQnJjE3uFWHe3v4kjAM54JafjAyDgGxq/view?usp=sharing

Response to Comment No. ORG 2B-9

The commenter states that the VMT analysis is insufficient and does not correctly characterize the anticipated income levels of the future residents. However, the comment does not provide substantial evidence that the Project would cause significant VMT impacts not disclosed in the Draft EIR as required by CEQA or that the Draft EIR is otherwise deficient under CEQA.

The City as the Lead Agency has the discretion to select the appropriate thresholds of significance and methodologies for evaluating a project's VMT. The City VMT thresholds were developed based on household VMT per capita and work VMT per employee and were established using the City's Travel Demand Forecasting Model, which is further described in Section 3.2.3 of the *City of Los Angeles VMT Calculator Documentation*.[22] The VMT Calculator uses a trip-based method, which includes trip length information and vehicle trip generation by trip purpose to determine total VMT, household VMT, and work VMT. For residential projects, the household VMT per capita threshold applies to home-based production trip types, and, for commercial projects, the work VMT per employee threshold applies to home-based work attraction trip types as the location and characteristics of residences and workplaces are often the main drivers of VMT, as detailed in Appendix 1 of the OPR Technical Advisory.

As it relates to the location and characteristics of residences and workplaces, transit infrastructure in proximity to a project plays a significant part in reducing overall VMT, particularly with short trips within downtown or along any of the fixed-rail corridors throughout the City and adjoining jurisdictions. Furthermore, market-rate, multi-family residential units, and affordable housing units are separate land uses in the VMT Calculator , which, as suggested by the commenter, considers the different vehicle trips and trip lengths associated with the two residential uses. The trip rates and trip lengths have been validated based on empirical counts conducted at residential, affordable housing, and mixed-used sites in the City.

As detailed in Section 1.2, Base Vehicle Trips and VMT Calculations, of the VMT Calculator Documentation, the trip generation characteristics of multi-use sites, including the amount of external traffic generated, is affected by one or more of the following:

- **The relative numbers of residents and jobs** – the better the site's jobs/housing balance, the greater the proportion of commute trips that remain internal.
- **The density of development** – the greater the concentration of dwellings and commercial space per acre, the greater the likelihood that the interacting land uses will be near enough together to encourage walking or short-distance internal driving.

[22] Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020.

- **The connectivity for walking or driving among different activities** – measured in terms of the ratio of intersections to total land area within one mile directly influences trip internalization and the number of trips made by walking instead of driving.
- **The availability of transit** – the greater the number of jobs within a reasonable travel time via transit, the greater the share of travel likely to occur by transit, and the lower the vehicular traffic generation. An example of this is someone who lives close to the Metro and has access to many jobs via transit versus someone living in an area less well served by transit who has limited access to jobs via transit and will be more likely to drive.
- **The number of convenient trip destinations within the immediate area** – the number of retail and other jobs in neighborhoods immediately surrounding the site increases the amount of walking to/from the site and reduces traffic generation.
- **Vehicle ownership –** a higher number of cars available per household increases the likelihood that trips will use a vehicle instead of taking other modes.
- **Household Size** – as the size of the household increases, more trips are made by the household.[23]

The VMT Calculator employs the above, as well as the intersection per square mile, population, employment, transit mode splits, vehicle ownership, and travel demand, in determining the trip generation for development sites. The Project's land use program and proximity to transit, jobs, and other uses are all contributing factors to support the conclusions made in the Transportation Assessment and environmental documentation that the Project would not result in significant VMT transportation impacts.

In addition, as shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, design modifications made to the Project in response to public and agency comments received on the Draft EIR have been addressed within a modified Project VMT analysis, included in Appendix F of this Final EIR. The reductions in VMT for the Project with design modifications follow the same rationale as evaluated in the Project's Transportation Assessment included in Appendix J of the Draft EIR.

Comment No. ORG 2B-10

II. The proposed Project incorporates various Transportation Demand Management (TDM) measures in its VMT analysis, including reduced parking supply, parking cash-out, bike share station, and inclusion of 742 short-term and long-term bicycle parking spaces. When accounting for these TDM Measures in its VMT traffic analysis, it was determined that the Project would result in a less-than-significant

[23] Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020.

VMT impact. We have concerns about the TDM Measures and how they were chosen for this Project.

A. In IV.J-32, it states: "*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 146 short-term and 596 long-term bicycle parking spaces. The Project's proposed 740 bicycle parking spaces meet the LAMC requirements for on-site bicycle parking supply*."

1. The above section incorrectly states the total number of proposed bicycle parking spaces and this should be fixed.

2. This section states that the majority of the bicycle parking spaces are required but does not provide sufficient details. The developer should provide additional information and calculations as to how they arrived at the total of 146 short-term and 596 long-term bicycle parking spaces.

3. The Project should provide details on exactly where on the site these 742 bicycle parking spaces will be located.

Response to Comment No. ORG 2B-10

This comment questions the number of the bicycle parking spaces that the Project would provide and asks about the locations of bicycle parking. The Project's bicycle parking requirement was calculated based of the City's short-term and long-term bicycle parking rates for the individual land uses identified in LAMC Section 12.21 A.16. Table 16, *Bicycle Code Parking Summary*, of the Project's Transportation Assessment, included in Appendix J-1 of the Draft EIR, provides calculations of the Project's bicycle space parking requirements. In accordance with the LAMC, the Project's bicycle parking spaces would be located in various areas throughout the Project Site on the ground level and within the parking garage areas that would be safely and easily accessible to bicyclists to serve their short- and long-term needs.

Also, please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes the design modifications made to the Project in response to public and agency comments received on the Draft EIR. As shown therein, the Project's total bicycle parking spaces have been increased from 742 spaces to 792 spaces, including 163 short-term and 629 long-term spaces.

Comment No. ORG 2B-11

B. In II-47, it states: "The Project's vehicular parking requirement under the LAMC is 2,658 spaces. However, pursuant to LAMC Section 12.21 A.4, the Project will replace some required vehicular parking spaces with bicycle parking spaces, which reduces the total vehicular parking requirement to

2,474 spaces. The Project would provide a total of approximately 2,475 vehicle spaces and 742 bicycle spaces, thus, meeting LAMC parking requirements. The parking calculations for the Project's various uses are provided in Table II-5, Vehicular Parking."

1. Table II-5 Vehicular Parking does not sufficiently explain how the 742 bicycle parking spaces resulted in a reduction of parking spaces from 2,658 to 2,474. The developer should provide a clearer explanation and show the calculation as to how the 742 bicycle parking spaces resulted in a reduction of 184 vehicle parking spaces.

Response to Comment No. ORG 2B-11

This comment states the Draft EIR does not clearly explain how bicycle parking reduces vehicle parking. Per LAMC Section 12.21 A.4, bicycle parking spaces can replace up to 10 percent of required vehicle parking spaces within residential/hotel buildings and up to 20 percent of required vehicle parking spaces within non-residential buildings at a rate of one vehicle space for every four bicycle spaces provided. As shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, the Project would provide a total of 792 bicycle parking spaces. Thus, up to 198 vehicle parking spaces may be replaced with bicycle parking spaces per LAMC Section 12.21 A.4.[24]

The Project Site is located within 0.5 mile of the Metro Little Tokyo/Arts District Station, which provides service to the Metro A Line and Metro E Line. The Metro Little Tokyo/Arts District Station is a major transit stop.[25]. Therefore, the Project Site would be located within a transit priority area, which is defined in PRC Section 21099 as an area within 0.5 mile of an existing or planned major transit stop.

State of California Assembly Bill 2097 (Friedman, 2022) (AB 2097) states that most development projects located within 0.5 mile of a major transit stop are not required to provide any parking for residential or commercial uses. As detailed in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, no hotel use is proposed under the Project with design modifications. Therefore, under AB 2097, no minimum parking would be required of the Project with design modifications. Nevertheless, the Project would continue to provide approximately 2,444 parking spaces within the on-site parking facilities to accommodate the parking needs of the Project visitors, employees, and residents.

24 792 bicycle parking spaces / (1 required automobile parking space/4 bicycle parking spaces) = 198 automobile parking spaces

25 "Major transit stop" is defined in PRC Section 21064.3 as a stop containing a rail or bus rapid transit station, a ferry terminal served by bus or rail transit, or the intersection of two or more major bus routes with headways of 15 minutes or less during the morning and afternoon peak hours.

Comment No. ORG 2B-12

C. Given the information cited in sections IV.J-32 and II-47, both the bicycle parking and the reduction in vehicle parking spaces are both LAMC code requirements, and the developer has bundled these along with a bike-share station and parking buy-out. The developer has failed to show any actual strategy or provided any basis for its selection of these TDM measures. Therefore, the developer should provide an assessment of the TDM measures they are using and justification for how they will result in less vehicle use.

Response to Comment No. ORG 2B-12

This comment states the Draft EIR should provide an assessment of the Project's TDM measures and justification for how they would result in less vehicle use. The VMT analysis includes TDM measures that would be implemented as part of the Project, including reduced vehicle parking supply, bicycle parking in accordance with LAMC requirements, a parking cash-out program, and a bicycle share station. As detailed in *Attachment G Transportation Demand Management Strategies in LA VMT Calculator*[26] the effectiveness of the TDM strategies included in the VMT Calculator is based on research documented in *Quantifying Greenhouse Gas Mitigation Measures*[27]. The strategies used in the VMT Calculator follow CAPCOA guidelines by either directly applying the CAPCOA methodology, applying the alternative literature methodology, or adjusting the methodology offered by CAPCOA to account for local needs and LADOT departmental goals. Where more recent research or local empirical data are available, those methods have been used in place of the methodology outlined by CAPCOA. The TDM strategies have individual levels of effectiveness, however, to ensure the effectiveness of TDM strategies is not overstated and that the VMT reductions in the VMT Calculator are dampened and capped. As detailed in the LADOT Assessment Letter, the preliminary TDM program shall be prepared and provided for LADOT review prior to the issuance of the first building permit, and a final TDM program approved by LADOT is required prior to the issuance of the first certificate of occupancy.

In addition, as shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, design modifications made to the Project in response to public and agency comments received on the Draft EIR have been addressed within a modified Project VMT analysis, included in Appendix F of this Final EIR. The reductions in VMT for the Project with design modifications related to bike parking spaces follow the same rationale as for the Project (i.e., LAMC compliance) evaluated in the Transportation Assessment included in Appendix J of the Draft EIR.

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26 LADOT, Attachment G Transportation Demand Management Strategies in LA VMT Calculator, November 2019.

27 California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, last updated August 2010.

Comment No. ORG 2B-13

III. Given that two out of the four listed TDM measures are required as part of local ordinances and the Draft EIR does not include any strategy or basis for its combination of TDM measures, we assert that the developer did not properly consider the existing conditions and its Draft EIR also failed to identify the correct and appropriate TDM measures to mitigate transportation impacts for the Project. Specifically:

A. The Project Draft EIR fails to include that Alameda Street is a designated truck route which presents unique GHG and safety considerations due to truck traffic.

B. The Project Draft EIR does mention that the sections of Central Avenue, Alameda Street, and 4th Street surrounding and intersecting the Project are listed in the City of Los Angeles' High Injury Network, which represents 6% of city streets (over 450 miles) that account for 70% of deaths and severe injuries for people walking. Yet, the Project failed to show how it plans to mitigate this safety issue along these streets and at the related intersections.

Response to Comment No. ORG 2B-13

This comment states that the Project does not include adequate TDM measures since they are, in part, required by local ordinances and fail to account for existing conditions. As detailed in Response to Comment No. ORG 2B-12, the Project's VMT analysis considered adequate and appropriate TDM strategies that would be implemented by the Project.

The comment also states the Draft EIR failed to include Alameda Street as a designated truck route, which presents unique GHG and safety considerations due to truck traffic. The comment further states that the Draft EIR failed to show how the Project would mitigate safety issues along streets and intersections as part of the City of Los Angeles' High Injury Network (HIN). In regard to Alameda Street as a designated truck route, the analysis of GHG impacts considered all Project-related construction emissions along the Project's potential haul route locations, including Alameda Street. GHG emissions are also regional in nature, unlike localized constriction-emission, which were fully evaluated in Section IV.A, *Air Quality*, of the Draft EIR. As outlined on pages 13 and 14 of the Transportation Assessment, included in Appendix J-1 of the Draft EIR, it is recognized that the streets adjacent to the Project Site are identified as part of the Vision Zero HIN. The Project's TDM program is aimed at reducing single-occupancy vehicle trips to the Project Site by encouraging and promoting the use of alternative transportation modes. The Project's TDM program would create a more pedestrian- and bicycle-friendly environment to improve the safety of pedestrians and bicyclists, consistent with the City's Vision Zero program to reduce vehicle-pedestrian conflicts. The Project would also provide landscaped setbacks along the Project frontages to create a more walkable and

attractive pedestrian environment. In addition, paved walkways would be provided internal to the site with access to and from the Project frontages along Central Avenue, Alameda Street, and 4th Street. The Project would also provide required dedications along 4th Street and Alameda Street to meet the Mobility Plan standards for sidewalk widths. Furthermore, as detailed in the Transportation Assessment, the Project would not preclude City implementation of the Vision Zero/ Mobility Plan. Further, the Project would implement safety improvements, as detailed in LADOT Assessment Letter, including the installation of a pedestrian midblock crossing signal (RRFB or HAWK) on 4th Street between Alameda Street and Merrick Street to improve pedestrian access in the area to address Vision Zero's goals of promoting pedestrian safety and reducing pedestrian-related fatalities, as well as contributing toward installation of bicycle and alternative mobility infrastructure. Therefore, the Project would support the City's Vision Zero program, and impacts with regards to the consistency with adopted plans, programs, ordinances, and policies regarding the circulation system were determined to be less than significant.

Based on the above, the Draft EIR considered and analyzed the evidence regarding potential environmental impacts of the Project pursuant to applicable CEQA requirements. The comment does not provide substantial evidence that the Project would cause significant transportation impacts not disclosed in the Draft EIR as required by CEQA or that the Draft EIR is otherwise deficient under CEQA.

Comment No. ORG 2B-14

Understanding the existing conditions is vital in determining the appropriate mix and efficacy of TDM measures. The Project's Transportation Assessment insufficiently assumes that the 2,044 total employees and 3,427 total residents of the Project will utilize public transportation or active transportation without providing additional existing improvements to support pedestrian and bicycle modes. The inclusion of TDM measures within a High Injury Network and a designated truck route is a recipe for disaster without providing adequate and safe infrastructure as mitigation. In addition, those who are more likely to use public transportation and active transportation due to financial reasons, such as low-income residents and low-wage workers, will be at the most at-risk of traffic-related injuries or fatalities.

Response to Comment No. ORG 2B-14

The comment states that the VMT analysis insufficiently assumed the anticipated transit ridership of the Project residents and employees. The existing transportation setting was reviewed, and the existing local circulation patterns were evaluated in Chapter 2 of the Transportation Assessment, included in Appendix J-1 of the Draft EIR. The transit ridership assumed in the LADOT VMT Calculator considered the project location and land use program. The base trip generation estimates were also adjusted using the mixed-use

(MXD) trip adjustment methodology, which relies on sociodemographic and built environment factors of the project's surroundings, including:

- The relative number of residents and jobs;
- The density of development;
- The connectivity for walking or driving among different activities;
- The availability of transit;
- The number of convenient trip destinations within the immediate area;
- Vehicle ownership; and
- Household size.

As detailed in Response to Comment No. ORG 2B-13, the Project would implement TDM measures to encourage alternative transportation modes to reduce single-occupancy vehicle trips. As discussed in Response to Comment No. AG 5-6 in the LA Metro comment letter dated November 27, 2023, the Project would provide upgraded and tree-lined sidewalks. Public sidewalks, which currently vary from 10 to 16 feet, would be replaced by new sidewalks 15 feet in width along the Project's frontages meeting minimum widths included in the City's Mobility Plan. Further, the Project would contribute towards the installation of a new signalized pedestrian crossing on 4th Street between Alameda Street and Merrick Street to improve pedestrian access in the area to address Vision Zero's goals of promoting pedestrian safety and reducing pedestrian-related fatalities, as well as contributions toward implementation of bicycle and mobility infrastructure.

Comment No. ORG 2B-15

LADOT, in its review of the Transportation Assessment provided by the Project (Appendix J-7), has requested the Project "*contribute a one-time fixed fee contribution of $150,000 to be deposited into the City's Bicycle Plan Trust fund to implement bicycle improvements in the vicinity of the project*." This is insufficient and inadequate funding needed to improve safety to bicycle users, given the dangers characterized by the High Injury Network and a designated truck route adjacent to the project. Rather, the project should provide mitigations:

C. Through its own funds, the Project should provide a hardened, protected bike lane and bicycle signaling along Central Avenue, from 5th Street to 1st Street, where the new Metro Little Tokyo/Arts District Regional Connector station is located.

D. In addition, the developer should provide an assessment of the TDM measures they are using, as mentioned above, and include additional infrastructure projects that would improve bicycle and pedestrian connections as mitigations.

Response to Comment No. ORG 2B-15

This comment states that the Project's funding of City bicycle improvements in the local Project vicinity is insufficient and inadequate and that the Project should fund a new bicycle lane and signaling along Central Avenue. The comment further states the Project's TDM measures should be further analyzed and include additional infrastructure projects that that would improve bicycle and pedestrian connections.

As detailed in the LADOT Assessment Letter and noted in the comment, the Project would contribute to the City's Bicycle Plan Trust Fund to implement bicycle improvements in the vicinity of the Project Site. In addition, the Project would also contribute towards the City's Mobility Trust Fund to implement mobility improvements in the vicinity of the Project Site. The appropriate bicycle and mobility improvements to provide safety to users in the Project area would be developed and implemented by the City. The Project is not responsible for providing a complete bicycle connection along Central Avenue all the way to the Metro Little Tokyo/Arts District Station, and implementation of bicycle and mobility improvements by the Project would not preclude the installation of any future infrastructure improvements. Off-site bicycle lanes would be developed as part of off-site improvements by the City as the bicycle lanes would be located within roadway right-of-way under City jurisdiction. Off-site improvements are beyond the scope of the Project and are part of the City's capital improvements to which development projects contribute their fair-share costs.

Furthermore, as detailed in Section IV.J, *Transportation*, of the Draft EIR, the Project would not result in a significant transportation impact. Therefore, no mitigation measures would be required. Nonetheless, the suggested improvements by the commenter are noted and will be provided to the decision-makers for their review and consideration.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications.[28] Applicable updates to the CEQA transportation analysis for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Comment No. ORG 2B-16

IV. The Draft EIR confirms a mixed pedestrian environment in IV.J-17, "*The Project study area generally has a patchwork of pedestrian facilities, including sidewalks and accessible curb ramps*." As listed in IV.J-31, the Project will provide the following improvements: "*The public sidewalks along Central Avenue, 4th Street,*

[28] As detailed in Appendix F of this Final EIR, "design modifications" include the removal of the 68-room hotel component, the increase in residential units from 1,521 units to 1,589 units, and the increase in commercial retail and restaurant space from 101,088 square feet to 145,748 square feet. The office component would remain unchanged at 411,113 square feet.

Alameda Avenue, and Gladys Avenue would be removed and replaced with upgraded and tree lined sidewalks. Public sidewalks, which currently vary from 10 to 16 feet, would be replaced by new sidewalks 15-feet in width along the Project's frontages." In addition to 15 feet wide sidewalks, the Project also claims it will provide landscaped paseos throughout the project. These amenities provide a pleasant walking environment on the Project property, however they do not go far enough to actually connect to high quality transit (Metro Regional Connector) which it claims VMT credits for. Providing 15-feet wide sidewalks is insufficient given the safety issues with walking on surrounding streets that are both in the High Injury Network and designated truck route. Rather, the project should also contribute as mitigations infrastructure supportive of an Pedestrian Enhanced District:

Response to Comment No. ORG 2B-16

The comment indicates that the Project's sidewalks are insufficient. However, the comment fails to provide substantial evidence that the sidewalks are insufficient even if they are on a HIN or haul route. As discussed on page IV.J-33 in Section IV.J, *Transportation*, of the Draft EIR, no Vision Zero safety improvements, such as those along a HIN route, are currently planned along the streets adjacent to the Project Site. Nonetheless, the Project's proposed improvements to the pedestrian environment would not preclude any Vision Zero safety improvements by the City. In addition, the Project would provide adequate dedications/improvements to meet the standards set forth in the Mobility Plan, as well as improve the pedestrian and bicycle environment adjacent to the Project Site, including lighting. As detailed in Response to Comment No. ORG 2B-15, the Project would also contribute towards the City's Mobility Trust Fund to fund mobility improvements in the Project area.

Further, the Project's VMT credits are based on those allowed in accordance with applicable LADOT guidelines, which have been reviewed and approved by LADOT as part of the Project's Transportation Assessment. The Project is not responsible for providing a complete connection from the Project Site to the Metro Little Tokyo/Arts District Station, and implementation of bicycle and mobility improvements by the Project would not preclude the installation of any future infrastructure improvements. Additional pedestrian improvements will continue to occur as future development occurs along such pedestrian corridors and with improvements made by the City that are funded through the City's Mobility Trust Fund.

Comment No. ORG 2B-17

A. The Project shall contribute through its own funds and working in conjunction with LADOT, create enhanced intersections to provide safe pedestrian connectivity to the Metro Little Tokyo/Arts District Regional Connector station at the following intersections: 2nd Street and Central Avenue, 3rd Street and Central Avenue, 4th Street and Central Avenue, 2nd Street and Alameda Street, and at 3rd Street and Alameda Street.

B. The Project should install pedestrian lighting on all sidewalks surrounding the Project, as well as on all street sections leading to local transit stops.

Response to Comment No. ORG 2B-17

This comment identifies intersection improvements the commenter believes the Project should contribute funds toward to enhance safe pedestrian connectivity in the area, as well as states that the Project should install pedestrian lighting on sidewalks surrounding the Project Site and leading to local transit stops. As detailed in Response to Comment Nos. ORG 2B-15 and ORG 2B-16, in addition to improvements surrounding the Project Site, the Project would also contribute towards the City's Mobility Trust Fund, which could be allocated by LADOT to fund enhanced pedestrian connections in the area, such as to the Metro Little Tokyo/Arts District Station noted by the comment. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 2B-18

C. The Project shall contribute, through its own funds and working in conjunction with LADOT, create enhanced intersections to provide safe pedestrian connectivity from the Project across points along Alameda Street to provide safe pedestrian connectivity to/from the Arts District and L.A. River. These include: 3rd Street/4th Place and Alameda Street and 4th Street and Alameda Street.

Response to Comment No. ORG 2B-18

This comment states the Project should contribute funds to various intersection enhancements in the Project vicinity. As detailed in Response to Comment No. ORG 2B-16 above, the Project's proposed improvements to the pedestrian environment would not preclude any Vision Zero safety improvements by the City. In addition, the Project would provide adequate dedications/improvements to meet the standards set forth in the Mobility Plan, as well as improve the pedestrian and bicycle environment adjacent to the Project Site, including lighting. As detailed in Response to Comment No. ORG 2B-15, the Project would also contribute toward the City's Mobility Trust Fund to fund mobility improvements in the Project area. Additional pedestrian improvements will continue to occur as future development occurs along such pedestrian corridors and with improvements made by the City that are funded through the City's Mobility Trust Fund. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 2B-19

D. In addition, the Project should conduct a traffic signal study around the Project area to consider the project's future growth, and:

Response to Comment No. ORG 2B-19

This comment states the Project should conduct a traffic signal study around the Project area to consider the Project's future growth. The Transportation Assessment (Appendix J of the Draft EIR) included a non-CEQA operational transportation analysis of the intersections surrounding the Project Site, which considered a total of 18 intersections (17 signalized and one unsignalized). Please refer to Figure 3 of the Transportation Assessment, which identified the locations of the study intersections. The operational transportation analysis included analysis of Future Year 2030 conditions, which considered future growth from future projects (Related Projects) and from regional growth projections (ambient growth). Please refer to Chapter 5 of the Transportation Assessment for the non-CEQA operational analysis of the Project area and the selected study intersections. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 2B-20

1. The Project shall work with LADOT to construct a traffic signal at Gladys Avenue and Central Avenue to mitigate traffic coming from the new project driveway, Gladys Avenue, and both directions on Central Avenue.

Response to Comment No. ORG 2B-20

This comment states that the Project should work with LADOT to construct a traffic signal at Gladys Avenue and Central Avenue to mitigate traffic coming from the new Project driveway, Gladys Avenue, and both directions on Central Avenue. An evaluation of the local circulation and Project driveway operations was conducted and included in the non-CEQA operational analysis of the Transportation Assessment (Appendix J of the Draft EIR). As detailed in Figure 16D of the Transportation Assessment, the Project would not add substantial traffic volume to the minor street approach (Gladys Avenue) of the intersection of Central Avenue and Gladys Avenue. Thus, the Project-added traffic at the location would not cause the peak hour volumes at the Gladys Avenue approach to exceed the minimum volume thresholds of LADOT's *Traffic Signal Warrants Worksheet* to justify the installation of a traffic signal at the intersection. Furthermore, as detailed in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, the Project modifications would not include any changes to the West Site development program or site access plan. Therefore, consistent with the Project evaluated in the Draft EIR, the modifications to the Project would not result in the peak hour volume at the Gladys Avenue approach of the intersection to exceed the minimum volume thresholds to justify the installation of a traffic signal at Central Avenue and Gladys Avenue.

Comment No. ORG 2B-21

2. Additionally, the project shall work with LADOT to install a mid-block pedestrian signal on 4th Street between Alameda Street and Merrick Street, as well as on Central Avenue between 4th and 5th streets, to improve the pedestrian access in the area, as indicated in Appendix J-7.

Response to Comment No. ORG 2B-21

This comment states that the Project should work with LADOT to install a mid-block pedestrian signal on 4th Street between Alameda Street and Merrick Street, as well as on Central Avenue between 4th and 5th streets, to improve the pedestrian access in the area. As detailed in the LADOT Assessment Letter dated September 8, 2022, included in Appendix J of the Draft EIR, the Project would contribute towards the installation of a mid-block pedestrian crossing signal (Rectangular Rapid Flashing Beacon [RRFB] or High Intensity Activated Crosswalk [HAWK]) on 4th Street between Alameda Street and Merrick Street to improve the pedestrian access and to address Vision Zero's goals of promoting pedestrian safety and reducing pedestrian-related fatalities, as well as contributing toward mobility improvements in the area. However, with two existing crosswalks along Central Avenue at 4th and 5th Streets, LADOT determined that an additional mid-block crosswalk on Central Avenue between 4th and 5th Streets was not warranted because pedestrians going to/from the West Site could safely access the North or South Site via the existing crosswalks. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 2B-22

E. The Project shall ensure that the minimum 15-feet in width sidewalks are prioritized for pedestrians, and pedestrian pathways are not blocked by the trees that will be planted.

Response to Comment No. ORG 2B-22

This comment states that the Project should ensure that the minimum 15-foot wide sidewalks are prioritized for pedestrians, and pedestrian pathways are not blocked by the trees that would be planted by the Project. As detailed in Section IV.J, *Transportation*, of the Draft EIR, the Project would provide street and sidewalk dedication and improvements to meet the Mobility Plan standards along all Project frontages. All Project sidewalks and landscaping will be reviewed by the City as part of its design review and permitting process to ensure safe and efficient pedestrian pathways are provided by the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 2B-23

F. In addition, the Project shall provide designated micromobility/on-demand scooter parking away from pedestrian traffic so micromobility vehicles do not block the sidewalks, park in the street or on private property (Project), and so as to not impede the flow of pedestrians on the sidewalks.

Response to Comment No. ORG 2B-23

This comment states the Project should provide designated micromobility/on-demand scooter parking. While this not a requirement for the Project per the City's Mobility Plan, the Project Applicant will consider such parking in its mobility planning. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 2B-24

V. Despite highlighting current bus routes on pages IV.J-14 to IV.J-16, the Project has also failed to indicate how it will facilitate connections for residents, workers and visitors moving to and from the bus routes to the Project. The majority of the bus routes operate further south of the Project, at 5th, 6th, and 7th streets, where the land use is still industrial and the same challenges with respect to safety (High Injury Network and truck route) apply. As mentioned above, the Project should, as part of an assessment of the TDM measures they are using, include additional infrastructure projects to the south of the property that would improve safe first/last mile connections to these bus stops.

Response to Comment No. ORG 2B-24

This comment states the Project should, as part of an assessment of the TDM measures, include additional infrastructure projects to the south of the Project Site that would improve safe first-mile/last-mile connections to these bus stops. As detailed in Section IV.J, *Transportatio*n, of the Draft EIR, the Project was conceived around a network of publicly-accessible plazas between buildings on each site with activated street frontages that create a high-quality pedestrian experience. The Project would implement a TDM program to reduce the use of single-occupancy vehicles to the Project Site and increase the number of Project trips by walking, bicycle, carpool, vanpool, and transit through design features, transportation services, education, and incentives intended to reduce the amount of single-occupancy vehicle trips during commute hours. Furthermore, the Project would contribute toward the City's Bicycle Trust Fund and Mobility Trust Fund to implement improvements in the Project area, the details of which have not yet been established. As detailed in the LADOT Assessment Letter (contained in Appendix J of the Draft EIR), the Project can facilitate access to transit, provide a pedestrian-friendly environment, promote non-automobile travel, and support the goals of a trip-reduction

program through strategic building design and orientation. Nevertheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 2B-25

AIR QUALITY

The Project DEIR states in IV.E-84, "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."

Through application of the various TDM measures, it was concluded in the Draft EIR that implementation of the proposed project would not result in a significant VMT impact, traffic, and GHG emissions.

However, TDM measures are context sensitive. The Project has failed to provide an assessment of these TDM measures, why they selected these measures, and how it would result in less vehicle travel for people living and working at this Project. In addition, the Project has failed to show how it will mitigate the existing unsafe street conditions, as the surrounding streets are identified in the High Injury Network and designated truck route. Without mitigating for safety in the built environment, the Project falsely assumes the effectiveness of its TDM measures. Instead, imagined active transportation trips will be replaced by shared ride vehicles, increasing VMT and resulting in air pollution, GHG emissions, and traffic.

Response to Comment No. ORG 2B-25

This comment states the Draft EIR did not adequately assess TDM measures and account for safety considerations. As explained in Section IV.J, *Transportation*, of the Draft EIR, the Project's VMT was calculated using the LADOT developed City of Los Angeles VMT Calculator Version 1.3 (May 2020) (VMT Calculator). As discussed in Section IV.J, *Transportation*, the City's VMT Calculator accounts for travel behavior zone (TBZ) categories to determine the magnitude of VMT and vehicle trip reductions that could be achieved through TDM strategies. As detailed in City of Los Angeles VMT Calculator Documentation, the development of the TBZs considered the population density, land use density, intersection density, and proximity to transit of each census tract in the City. The Project is located in an Urban (Zone 4) TBZ based on the latitude and longitude of the Project address. Additionally, as explained in Section IV.J, *Transportation*, the VMT Calculator measures the reduction in VMT resulting from a project's incorporation of TDM strategies as project design features or mitigation measures. The following seven categories of TDM strategies are included in the VMT

Calculator: parking, transit, education and encouragement, commute trip reductions, shared mobility, bicycle infrastructure, and neighborhood enhancement.

TDM reductions within each of these categories were applied to the Project, as applicable, according to the guidance found in the City of Los Angeles VMT Calculator Documentation and the TDM Strategies Appendix, which have been empirically demonstrated to reduce trip-making or mode choice in such a way as to reduce VMT, as documented in the CAPCOA research and methodologies as described in Quantifying Greenhouse Gas Mitigation Measures.[29,30,31] Residential and commercial land use TDM credits are calculated separately as certain TDM measures are more appropriately employed for commercial or residential land uses. For example, for commercial tenants, vanpools and rideshare may be effective tools to reduce employee solo vehicle trips. However, vanpools would be difficult to implement for residents who are traveling from the Project to many disparate destinations. For residents, unbundling parking is more effective because residents are incentivized to reduce car ownership to save on condominium unit purchase price or monthly rental costs for a vehicular parking space. Additionally, the net effectiveness of commute trip reductions is reduced for the commercial land uses as those measures are only applicable to the work trips made by commercial land use employees, rather than the trips made by the commercial patrons. Therefore, as described in Section IV.J, *Transportation,* the Project would generate per capita and per employee VMT that are below the City's thresholds of significance, resulting in a less-than-significant impact on VMT consistent with the 2020-2045 RTP/SCS VMT reduction goals. The Project would similarly result in a less-than-significant impact on VMT in cumulative conditions.

As such, Section IV.J, *Transportation*, of the Draft EIR, thoroughly explained the effectiveness of the Project's TDM measures as accounted for in the City's VMT calculator and supported its less than significant VMT impact determination. Thus, Project impacts regarding the air quality and GHG emissions impacts from Project VMT and reductions associated with Project TDM measures were accurately analyzed in Sections IV.A, *Air Quality* and IV.E, *Greenhouse Gas Emissions,* respectively.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications, and refer to Appendix C of this Final EIR for air quality and GHG emissions technical data associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections*

29 LADOT and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020.

30 LADOT, Attachment G Transportation Demand Management Strategies in LA VMT Calculator, November 2019.

31 California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures, August 2010.

to the Draft EIR, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Comment No. ORG 2B-26

Additional analysis conducted separate from the VMT analysis confirms that there will indeed be a significant traffic impact. In Appendix J Transportation, the LADOT Transportation Assessment findings state (J-6), "*During preparation of the new CEQA guidelines, the State's Office of Planning and Research stressed that lead agencies can continue to apply traditional operational analysis requirements to inform land use decisions provided that such analyses were outside of the CEQA process. The authority for requiring non-CEQA transportation analysis and requiring improvements to address potential circulation deficiencies, lies in the City of Los Angeles' Site Plan Review authority as established in Section 16.05 of the LAMC. Therefore, LADOT methodology and the study discloses that trips generated by the proposed development may result in adverse increase in delays or queueing. A copy of the circulation analysis table that summarizes these potential deficiencies is provided as Attachment C to this report*."

Attachment C of the LADOT Transportation Assessment findings, located in Appendix J, pages J-22 and J-23, includes the following Level of Service in Existing Conditions (2021) and Future with Project (2030). Key intersections Central Avenue & 3rd Street, as well as Alameda Street and 3rd Street, are the intersections separating the proposed Project and Little Tokyo. The intersection at Alameda Street and 1st Street is a critical juncture in Little Tokyo that allows residents to go west to Civic Center/Downtown, north to the 101 Freeway, and east to East Los Angeles. LADOT's additional Level of Service analysis shows that traffic wait times will increase at each of these intersections, worsening air pollution and increasing GHG emissions from vehicular traffic, thus significantly impacting Little Tokyo.

Intersection	Peak Hour	Existing Conditions level of Service	Future with project Conditions
Central Avenue & 3rd Street	AM PM	D C	F F
Alameda Street & 1st Street	AM PM	D C	E E
Alameda Street & 3rd Street/4th Pl.	AM PM	E C	F D

Response to Comment No. ORG 2B-26

This comment states that there would be traffic-related Project impacts, which would result in worsening air pollution and increasing GHG emissions and traffic. As described in Section IV. A, *Air Quality*, page IV. A-97 of the Draft EIR, the potential for Project intersections to cause or contribute to CO hotspots was evaluated by comparing

Project intersections with prior studies conducted by the SCAQMD in support of their AQMPs and considering existing background CO concentrations. As discussed in Section IV. A, *Air Quality*, based on the Project's TA,[32] 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 average daily trips (ADT)[33] and total traffic volumes at the maximally impacted intersection would likely have to increase by approximately four times to cause or contribute to a CO hotspot impact given that vehicles operating today have reduced CO emissions as compared to vehicles operating in year 2003 when the SCAQMD conducted the AQMP attainment demonstration modeling.[34] This comparison demonstrates that the Project would not contribute to the formation of CO hotspots and that no further CO analysis is required. Therefore, the Project would result in less-than-significant impacts with respect to CO hotspots.

Furthermore, Project impacts regarding the air quality and GHG emissions impacts from vehicular traffic were analyzed in Sections IV.A, *Air Quality* and IV.E, *Greenhouse Gas Emissions,* of the Draft EIR, respectively. As analyzed therein, no significant and unavoidable long-term air quality or GHG impacts would occur with Project implementation with regard to vehicle traffic.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications, and refer to Appendix C of this Final EIR for air quality and GHG emissions technical data associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Comment No. ORG 2B-27

As mentioned previously, Alameda Street is a designated truck route in Los Angeles connecting the industrial district to the 101 Freeway to the North and 10 Freeway to the South. Even though the Project will convert a current industrial site into a mixed-use development, the surrounding area is still industrial and frequented by semi-trailer truck traffic. Semi-trailer trucks emit more carbon dioxide and other greenhouse gas emissions than passenger cars, and these emissions worsen with increased traffic wait times.

32 Gibson Transportation Consulting, Inc., Transportation Assessment for the Fourth & Central Project, June 2022. Provided in Appendix J of the Project's Draft EIR.

33 The traffic volume of approximately 63,320 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), 2017.

34 SCAQMD, 2003 AQMP, Chapter 6 Clean Air Act Requirements.

Therefore, as shown by LADOT, Little Tokyo will be significantly impacted by the additional GHGs generated by Project-related traffic even with included TDM measures.

Response to Comment No. ORG 2B-27

This comment states that Little Tokyo would be significantly impacted by the additional GHGs generated by Project-related traffic even with included TDM measures. As mentioned in the comment and as described in Sections IV.A, *Air Quality* and IV.E, *Greenhouse Gas Emissions*, of the Draft EIR, the Project would replace existing cold storage facilities with a mixed-use development project that would include multi-family housing, office, retail, and restaurant uses. Project construction would include the use of construction vehicles and trucks that would emit GHG emissions during the Project's temporary construction period. The Project would not include any truck stop or warehouse distribution uses, and operations would generate only minor truck traffic, such as from delivery trucks and occasional maintenance. Additionally, relative to existing conditions, since the Project would remove the existing cold storage facilities, the GHG emissions from the approximately 144 trucks and equipped TRUs that currently visit the site on a daily basis would no longer occur.

Furthermore, Project impacts regarding the GHG emissions impacts from Project-related construction and operational traffic were analyzed in Section IV.E, *Greenhouse Gas Emissions,* of the Draft EIR. As evaluated therein, GHG emissions impacts would be less than significant.

In addition, refer to Appendix C of this Final EIR for air quality and GHG emissions technical data associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Comment No. ORG 2B-28

GHG emissions are of particular concern to the Little Tokyo community. Little Tokyo is in the 98th percentile in CalEnviroScreen 4.0, and is in the 98th percentile in pollution burden. Therefore, the area residents and workers are already overburdened by existing air quality challenges and the Project Draft EIR fails to consider in its analysis that Little Tokyo and the surrounding area have been uniquely identified as Environmental Justice communities.

Response to Comment No. ORG 2B-28

This comments states that the Draft EIR fails to adequately address impacts to the Little Tokyo community. The comment is correct in saying that Little Tokyo is in the 98th percentile in CalEnviroScreen 4.0 and is in the 98th percentile in pollution burden. However, as described in Sections IV.A, *Air Quality* and IV.E, *Greenhouse Gas*

Emissions, of the Draft EIR, the Project would replace existing cold storage facilities with a mixed-use development project that would include multi-family housing, office, retail, and restaurant use. Project construction would include the use of construction vehicles and trucks that would emit GHG emissions during the Project's construction period. Operation of the Project would not include any truck stop or warehouse distribution uses and operations would generate only minor truck traffic, such as from delivery trucks and occasional maintenance. Additionally, since the Project would remove the existing cold storage facilities, the air quality and GHG emissions from existing facilities operations, such as vehicle trips, including approximately 144 trucks and equipped TRUs that currently visit the site on a daily basis to and from the Project Site, on-site combustion of fossil fuels for existing emergency generators, on-site combustion of natural gas for heating, fugitive refrigerant emissions from coolers and freezers, and fugitive emissions of volatile organic compounds (VOCs) from the use of aerosol products and coatings, as well as solid waste and water and wastewater treatment, would no longer occur. The Project's construction activities and net Project operational impacts regarding the air quality and GHG emissions were analyzed in Sections IV.A, *Air Quality* and IV.E, *Greenhouse Gas Emissions,* respectively. Also, as evaluated in Section IV.A, *Air Quality*, the air quality analysis included an assessment of localized emissions and toxic air contaminate (TAC) impacts to nearby sensitive receptors, including impacts to the nearest sensitive receptor north the Project Site within the Little Tokyo community, consisting of residential uses north of 3rd Street between Central Avenue and Alameda Street. Updates to Section IV.A, *Air Quality*, and IV.E, *Greenhouse Gas Emissions*, of the Draft EIR, as a result of the Project's modified air quality mitigation measures, are included in Section III, *Revisions, Clarifications, and Corrections to the Draft EIR*, of this Final EIR. As shown in the respective analyses, impacts to these residential uses would be less than significant after mitigation. Thus, more distant sensitive receptor locations within Little Tokyo would also be exposed to less-than-significant air quality impacts after mitigation. Overall, as evaluated in the Draft EIR, short-term and long-term air quality and GHG impacts to the entire Project vicinity, including the Little Tokyo community, would be less than significant with mitigation.

In addition, refer to Appendix C of this Final EIR for air quality and GHG emissions technical data associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Comment No. ORG 2B-29

CONSTRUCTION IMPACTS

The Project Draft EIR lists several "significant and unavoidable" construction impacts:

- Air quality
    - From VI-1: "*As the Project's short-term construction impacts would be significant and unavoidable, Project construction-related NOX and CO emissions combined with emissions from construction of related projects could also exceed the applicable regional NOX and CO emissions significance thresholds and would, thus, result in a cumulatively significant and unavoidable impact*."
- Noise
    - From VI-4: "Therefore, ground-level construction noise impacts associated with on- site noise sources would be less than significant with mitigation incorporated. However, construction noise impacts associated with on-site noise sources at elevated noise- sensitive receptor locations located on the upper floors of buildings at receptor locations R2 through R6 would be significant and unavoidable."
    - From VI-5: "Thus, it is conservatively concluded that the Project's contribution to cumulative construction noise associated with on-site construction equipment would be cumulatively considerable and would represent a significant and unavoidable cumulative impact."
    - From VI-5: "the combined off-site construction noise from Project haul trucks and related project trucks could exceed the significance threshold."
- Vibration
    - From VI-6: "However, because receptor V3 includes privately-owned structures, inspections and repair pursuant to Mitigation Measure NOI-MM-7 would require the consent of the property owner, who may not agree. Thus, impacts to receptor V3 would be significant and unavoidable."

In addition, II-52 of the Project DEIR states: "*Overall, construction would include up to approximately 651,000 cubic yards (CY) of grading (cut), including 105,000 CY within the North Site, 534,000 CY in the South Site and 12,000 CY in the West Site, all of which would be exported from the Project Site, with excavations depths to approximately 57 feet below the ground surface (bgs) for the lowest foundations and approximately 64 bgs in isolated areas for elevator pits*."

These significant and unavoidable construction impacts will undoubtedly affect the surrounding neighborhoods such as Little Tokyo, in particular the businesses, residents, childcare centers, and places of worship located adjacent to the Project including Tokyo Villa, Higashi Honganji Buddhist Temple, and Centenary United Methodist Church. Centenary United Methodist Church was founded in 1896. Higashi Honganji Buddhist Temple, located 780 feet from the Project, was founded in 1904 and houses a daycare center with 13 young children attending. The religious institutions have served generations of community members and they are deeply important to us. As mentioned above, Little Tokyo is a recognized Environmental Justice community and the area's residents and workers are already overburdened by existing air quality challenges. Construction dust, noise and vibration from this massive Project will impact the health and well-being of our residents, workers, and patrons – many of them elderly. The Project's Draft EIR does not consider impacts to these sensitive populations adjacent in Little Tokyo nor does it provide appropriate mitigations. The Project should:

Response to Comment No. ORG 2B-29

The comment states that the Draft EIR does not consider the Project's significant and unavoidable air quality and noise impacts on sensitive receptors/populations in the Little Tokyo community. The air quality impact discussed in the comment is a regional construction impact based on the SCAQMD's regional thresholds from the SCAQMD's CEQA Air Quality Handbook that determine if a project would potentially result in a significant impact of a federal or State non-attainment pollutant.[35] As disclosed under Threshold (b) starting on page IV.A-65 in Section IV.A, *Air Quality*, of the Draft EIR, the Project's temporary regional construction impact related to regional NO_X and CO would remain significant and unavoidable with the implementation of Mitigation Measure AQ-MM-1: Construction Equipment Features and Mitigation Measure AQ-MM-2: Concrete Truck Features. However, contrary to the comment's assertion that the Project's Draft EIR does not consider construction air quality impacts on sensitive populations in Little Tokyo near the Project Site, the Project's nearest air quality sensitive receptors are described on page IV.A-29 and the Project's localized construction air quality impacts concerning these sensitive receptors and appropriate and feasible mitigation measures are provided under Threshold (c) of the Draft EIR, on pages IV.A-89 through IV.A-95 and pages IV.A-101 through IV.A-107. As disclosed therein, the air quality analysis included an assessment of localized emissions, as well as TAC, and impacts to nearby sensitive receptors, including impacts to the nearest sensitive receptor north of the Project Site within the Little Tokyo community, consisting of residential uses north of 3rd Street between Central Avenue and Alameda Street. As shown in the respective analyses, impacts to these residential uses would be less than significant after mitigation. Thus, more distant sensitive receptor locations within Little Tokyo would also be exposed to less-than-significant air quality impacts. Localized construction impacts regarding the exposure of substantial pollutant concentrations on sensitive receptors during construction would be reduced to less than significant with the implementation of Mitigation Measure

35 SCAQMD, Air Quality Significance Thresholds, March 2023.

AQ-MM-1 as described on pages IV.A-63 to IV.A-64. Therefore, the Project's localized and TAC construction air quality impacts on air quality sensitive populations and feasible and appropriate mitigation measures were disclosed sufficiently in the Project's Draft EIR.

In addition, the Project's nearest noise-sensitive receptors were described on pages IV.G-16 to IV.G-18 in Section IV.G, *Noise*, and the Project's on-site construction noise impacts concerning these sensitive receptors, including those in Little Tokyo, and appropriate and feasible mitigation measures were provided under Threshold (a), on pages IV.G-37 to IV.G-38 and pages IV.G-63 to IV.G-66. As disclosed therein, localized construction impacts regarding ground-level construction noise impacts associated with on-site noise sources would be less than significant with mitigation incorporated. However, construction noise impacts associated with on-site noise sources at elevated noise-sensitive receptor locations located on the upper floors of buildings at receptor locations R2 through R6 would be significant and unavoidable even with implementation of Mitigation Measures NOI-MM-1, NOI-MM-2, and NOI-MM-3, as described on pages IV.G-63 and IV.G-64. It is noted that construction noise impacts at the nearest noise sensitive receptor (the Centenary United Church – R1) north of the Project Site within the Little Tokyo community, would be less than significant. Thus, more distant sensitive noise receptor locations within Little Tokyo would also have less-than-significant construction noise-related impacts.

The Project's off-site construction noise impacts concerning these sensitive receptors and appropriate and feasible mitigation measures were provided under subsection Threshold (a), on pages IV.G-39 to IV.G-43 and pages IV.G-63 to IV.G-66. As disclosed therein, localized construction impacts regarding off-site construction traffic noise impacts from haul trucks would be less than significant, and the Project's off-site concrete truck construction noise impacts would be less than significant with implementation of Mitigation Measure NOI-MM-4, which prohibits concrete trucks from traveling to and from the Project Site on Central Avenue between 1st Street and 2nd Street, Central Avenue between 2nd Street and 3rd Street, and 4th Street between Alameda Street and Hewitt Street during the Project's foundation concrete pouring stage. Therefore, the Project's construction on-site and off-site noise impacts on noise-sensitive receptors, including those in Little Tokyo, and feasible and appropriate mitigation measures were disclosed sufficiently in the Project's Draft EIR.

Furthermore, the Project's nearest vibration-sensitive receptors are described on pages IV.G-17 to IV.G-19 of the Draft EIR. The Project's construction vibration impacts concerning these sensitive receptors regarding structural damage and appropriate and feasible mitigation measures are provided under Threshold (b), from pages IV.G-68 to IV.G-70 and pages IV.G-73 through IV.G-75. As disclosed therein, construction impacts regarding short-term construction groundborne vibration impacts associated with structural damage would be less than significant with implementation of Mitigation Measures NOI-MM-6 and NOI-MM-7 for the majority of on-site construction activities but would be significant and unavoidable for receptor V3 (commercial buildings to the south, west, and

southwest of Project's West Site) even with implementation of Mitigation Measures NOI-MM-6 and NOI-MM-7, as described on pages IV.G-73 to IV.G-74.

The Project's construction vibration impacts concerning these sensitive receptors regarding human annoyance is provided under Threshold (b), from pages IV.G-71 to IV.G-72. As disclosed, the Project would not result in the generation of excessive groundborne vibration, and vibration impacts associated with human annoyance from on-site construction activities would be less than significant. Potential vibration impacts with respect to human annoyance from construction trucks traveling along the anticipated haul route would be less than significant. It is noted that due to the rapid attenuation characteristics of groundborne vibration and distance, for more distant buildings within Little Tokyo beyond those identified as vibration sensitive receptors on Figure IV.G-3, *Sensitive Receptors*, in Section IV.G, *Noise*, of the Draft EIR, there would be no potential for the Project to cause significant vibration impacts. In conclusion, the Project's construction vibration impacts regarding structural damage and human annoyance on vibration-sensitive receptors and feasible and appropriate mitigation measures were discussed sufficiently in the Project's Draft EIR.

In addition, refer to Appendix C and Appendix E of this Final EIR for air quality/GHG emissions and noise technical data, respectively, associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Comment No. ORG 2B-30

I. Provide analysis on construction impacts to sensitive Environmental Justice communities living, working, and attending services adjacent to the Project, including Little Tokyo.

Response to Comment No. ORG 2B-30

This comment states the EIR should provide analysis on construction impacts to sensitive Environmental Justice communities living, working, and attending services adjacent to the Project, including Little Tokyo. Please refer to Response to Comment No. ORG 2B-29 above for discussion of the Project's localized construction air quality impacts on air quality-sensitive receptors and feasible and appropriate mitigation measures, the Project's construction on-site and off-site noise impacts on noise-sensitive receptors and feasible and appropriate mitigation measures, and the Project's construction vibration impacts regarding structural damage and human annoyance on vibration-sensitive receptors, which were disclosed sufficiently in the Project's Draft EIR. Localized construction impacts are based on impacts to the closest sensitive receptors. Thus, other sensitive uses, including Environmental Justice communities, located at greater distances from the Project Site would experience lower construction-related impacts due to atmospheric dispersion effects. Because the Project's localized construction impacts at

the nearest sensitive receptors were able to be mitigated to a less-than-significant level, it follows that more distant receptors, including Environmental Justice communities, would also experience less-than-significant localized impacts with implementation of the Project's mitigation measures.

Comment No. ORG 2B-31

II. Commit to further mitigation measures which will offset these impacts including, but not limited to:

A. Lowering the height of the proposed buildings and the scale of the Project.

B. Provide regular street and site clean-up to minimize the effects of spreading construction dust and dirt.

C. Provide a construction communications plan which shall, at minimum, include a dedicated point of contact who will be available via telephone and email to community members with concerns about construction impacts, and that the Project developer meet with community members on a regular basis, at minimum a monthly basis, to provide construction updates, obtain feedback from Little Tokyo stakeholders on the effectiveness of mitigation measures, as well as how the Project will adjust its mitigations if they become ineffective.

Response to Comment No. ORG 2B-31

This comment includes suggested mitigation measures to offset construction-related impacts. Regarding suggested Mitigation Measure A listed above, the commenter fails to explain how lowering the height of the Project's proposed buildings would contribute to reducing the construction air quality, noise and vibration impacts regarding sensitive populations. As explained under the Methodology subsections on pages IV.A-34 to IV.A-45 for air quality, and pages IV.G-29 to IV.G-36 for noise of the Draft EIR, the impact analyses for both air quality and noise are based on the maximum daily emissions and noise levels, respectively. As such, a reduction in the height of the Project's buildings would not change or reduce the Project's maximum daily air quality and noise impacts. However, as discussed in Response to Comment No. ORG 2B-8, the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR. These modifications are shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. As shown therein, modifications have been made to reduce the height of Building 2 on the North Site from 44 stories to 30 stories, while increasing the height of Building 6 (on the South Site) from six stories to 26 stories, and to reduce the residential density/unit count in Building 2 on the North Site from 449 units to 335 units, a 114-unit reduction. With this shift, the size and massing of the Project's tallest building (Building 2) on the North Site, which is closest to Little Tokyo, would be reduced.

Suggested Mitigation Measure B would not be required because as explained in Section IV.A, *Air Quality*, the Project would implement required construction fugitive dust control measures pursuant to SCAQMD Rule 403 that are accounted for in the air quality impacts analyses for construction-related fugitive dust. SCAQMD Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter ($\mu g/m^3$), and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Best available control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Furthermore, as presented in Draft EIR Section IV. A, *Air Quality*, Table IV.A-7 through Table IV.A-11, Project regional construction PM_{10} and $PM_{2.5}$ emissions would be below applicable SCAQMD regional thresholds when accounting for SCAQMD Rule 403. As discussed under Threshold (b) beginning page IV.G-76 of the Draft EIR, the Project would be required to implement Mitigation Measures AQ-MM-1 and AQ-MM-2 to reduce regional NO_X and CO emissions. These measures would have co-benefits of reducing emissions of PM_{10} and $PM_{2.5}$ from heavy-duty diesel construction equipment and heavy-duty trucks further reducing the PM_{10} and $PM_{2.5}$ emissions below SCAQMD regional thresholds, as shown in Table IV.A-14 through Table IV.A-18.

In addition, refer to Appendix C of this Final EIR for air quality and GHG emissions technical data associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Regarding suggested Mitigation Measure C, as described in Section IV.G, *Noise*, of the Draft EIR, the Project would be subject to LAMC Section 91.106.4.8 (Construction Site Notice, City's Ordinance No. 178,048), which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. Furthermore, as described in Section IV.J, *Transportation*, of the Draft EIR, the Project includes Project Design Feature (PDF) TRAF-PDF-1: Construction Management Plan. This PDF states that prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan, including haul routes and a staging plan, will be prepared and submitted to the City for review and approval. The Construction Management Plan will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of

the Project Site and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

Therefore, as Project Design Measure TRAF-PDF-1 includes the identification of a construction manager, suggested Mitigation Measure C is not required. Specifically, the Project's Construction Management Plan will include requirements to provide advance notification to adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation, along with contact information of the construction manager for any inquiries or complaints from residents regarding construction activities posted at the site. As such, community members will have communication access to the construction manager about ongoing construction activities. Furthermore, the Project contractors and/or developers are open to meeting with community members on a monthly basis to provide updates on construction activities, including the status of mitigation measures to be implemented by the Project.

Comment No. ORG 2B-32

III. Lastly, on II-53, it states: "In order to ensure timely Project completion, construction hours would occur Monday through Saturday in accordance with the LAMC.

Construction hours could extend beyond allowable hours set forth in the LAMC if required and specifically permitted by the City." This is of great concern and is unacceptable to Little Tokyo businesses, residents, and places of worship. The Project should study the impact of extended construction on sensitive populations and small businesses and provide appropriate mitigations.

Response to Comment No. ORG 2B-32

This comment states the Draft EIR should study the impact of extended construction on sensitive populations and small businesses and provide appropriate mitigation. As discussed in Section IV.A, *Air Quality*, and Section IV.G, *Noise*, of the Draft EIR, Project construction would require approximately 7 days of continuous 24-hour foundations/concrete pour phases, which includes weekdays, as well as weekends. The remaining construction phases would be within allowable construction hours set forth in the LAMC. The Project's detailed construction phasing assumptions and equipment list, including those associated with the continuous 24-hour foundations/concrete pour phases, is included in Appendix B – *Air Quality/Greenhouse Gas Emissions Technical Documentation,* of the Project's Draft EIR. Project impacts regarding the air quality, greenhouse gas, energy, and noise impacts from construction phases within LAMC allowable hours and the occasional continuous 24-hour foundations/concrete pour phases that would extend beyond LAMC allowable construction hours were analyzed in Sections IV.A, *Air Quality*, IV.C, *Energy*, IV.E, *Greenhouse Gas Emissions*, and IV.G, *Noise,* of the Draft EIR, respectively, and all feasible mitigation measures were incorporated to reduce the Project's construction impacts, as fully analyzed therein. However, as concluded in the Final EIR, impacts related to regional construction air quality and on-site and off-site construction noise would remain significant and unavoidable.

In addition, refer to Appendix C and Appendix E of this Final EIR for air quality/ GHG emissions and noise technical data, respectively, associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Comment No. ORG 2B-33

OPEN SPACE

The Project states that it will include 163,325 sf of Los Angeles Municipal Code (LAMC) required usable open space. Specifically, 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.

However, the Project does not show how it will allow tenants and workers to connect to the Little Tokyo Galleria mall, which is adjacent to the Project's north-side buildings.

Furthermore, Building 2 on the north side is surrounded by a new driveway, which further accentuates the separation of the two properties. The adjacent Little Tokyo Galleria property includes existing restaurants, a supermarket, and other retail businesses. The Project should work with the Little Tokyo Galleria to provide a convenient, well-lit, and safe pedestrian pathway, improving connectivity between the properties, so that tenants and workers do not have to cross the Little Tokyo Galleria parking lot, or walk all the way around to the 3rd St. entrance.

Response to Comment No. ORG 2B-33

This comment summarizes the Project's open space features and requests the Project to provide pedestrian connectivity with the Little Tokyo Galleria shopping mall. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nevertheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 2B-34

Many of the Project's open space features emphasize businesses and shopping – connecting pedestrians to boutique shops, artisan workstations, open-air artisan market – similar to a promenade. From the Project Description, only the 5th St. Pocket Park, totaling 4,791 sf, will be available for physical activity. Even then, the 5th St. Pocket Park will have even less space for human activity than indicated, as part of the space will be utilized as a dog park. There is already a lack of open spaces available to downtown residents, especially for children and youth. According to the Trust for Public Land, Los Angeles received an accessibility score of 44 out of 100 for the percentage of residents who live within a walkable half-mile of a park[11]. Los Angeles also received an equity score of 33 out of 100 for availability of parks taking into account race and income. The publicly accessible open spaces provided by the Project are insufficient to serve the 2,044 total employees and 3,427 total residents of the Project, let alone the public. The project boasts 105,218 sf of residential open space such as rooftop terraces and recreation rooms. More spaces in the Project's open space plan should be made available to the public, including its neighbors in Little Tokyo.

[11] https://parkserve.tpl.org/downloads/pdfs/Los%20Angeles_CA.pdf

Response to Comment No. ORG 2B-34

This comment states that the Project should provide more publicly-accessible open space. The Project Site is currently devoid of any open space areas. Although the Project is not required to provide any public open space, it would provide approximately 90,113 square feet of publicly-accessible open space within 13 individually curated publicly-accessible open space areas, which would be provided as a benefit and amenity for the community as a whole and to support a successful placemaking environment. Therefore, the Project would provide open space accessible to the public and, thus, increase park

opportunities in the area. The 5th Street Pocket Park is only part of the whole of the Project's 90,112 square feet of publicly-accessible open space.

The Project's publicly-accessible uses would consist of paseos, plazas, and private park space accessible to the public. The open space areas would include trees, landscaping, dining patios, raised planters, wood benches, umbrellas, cabanas, decking, artificial and natural turf, and a broad range of paver types (circular, pebble, concrete, etc.). As discussed on page IV.F-27 in Section IV.F, *Land Use and Planning*, in the Draft EIR, with the Project's proposed opens space areas and features, the Project would contribute to the City's open space resources, including those available for public use.

The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 2B-35

The current open space features are consistent with development projects that support young professionals. The Project fails to include open space amenities that would serve families with children. Amenities, services, and businesses that are family-friendly would support longer-term residents. Long-term residents provide a sense of stability and continuity to a community because they are invested in the community's well-being and contribute to its long-term development. Therefore, the Project should include additional open spaces tailored towards families with children.

Response to Comment No. ORG 2B-35

As explained on page IV.I.4-16 of the Draft EIR, the Project includes a variety of open space amenities and features to serve the Project's residents, as well as the public. Publicly-accessible amenities provided throughout the Project's open space areas would include seating and dining areas, benches or other seating options, and shade structures or umbrellas, in addition to landscaping, shade trees, and planters. The Project's residential open space and amenity features available to residents and their guests 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.

Comment No. ORG 2B-36

In addition, any publicly accessible open spaces should follow the standards defined in Chapter II of the Community Plan Implementation Overlay District for DTLA 2040[12]:

"*On-site publicly accessible open space, constructed in accordance with the requirements listed below*:

i. At least one public restroom and drinking water fountain shall be provided within, adjacent to, and/or and directly accessible from the publicly accessible open space. Public restrooms shall be made available during the operational hours of the publicly accessible open space, and shall not necessitate the need to enter secured or otherwise publicly inaccessible portions of a building or site. Signage viewable from within the publicly accessible open space shall indicate that the restroom and drinking water fountain is available for public use.

ii. At least 20% of the publicly accessible open space shall be shaded. Percentage shading shall be the shadow cast on the publicly accessible open space measured at noon (12:00 p.m.) on the summer solstice."

[12] https://planning.lacity.org/odocument/a8041944-5478-4f7b-ae9b-18c42049c522/Draft_Plan_4.pdf

Response to Comment No. ORG 2B-36

This comment suggests the Project should be required to follow the Privately Owned Public Space standards that apply to projects participating in the Public Benefits Incentive Program, which is part of the Downtown Community Plan Update (DTLA 2040) Community Plan Implementation Overlay (CPIO) District. On May 3, 2023, the City Council adopted the first reading of the DTLA 2040 Plan, which is a combined update to the Central City and Central City North Community Plans. The City Attorney will review and finalize the implementing ordinances to ensure clarity of regulations and consistency with State law. After the City Attorney review process is complete, the City Council will consider and vote on the DTLA 2040 Plan implementing ordinances which if adopted, will then go into effect. As such, the Central City Community Plan is still the operative land use document for the Project Site, and therefore, DTLA 2040 Plan is not applicable to the Project or Project Site. Nevertheless, pages IV.F-32 to IV.F-34 in Section IV.F, *Land Use and Planning*, of the Draft EIR, provide a general consistency analysis with the draft version of the DTLA 2040 plan that the City Council voted to approve (with amendments) on May 3, 2023.

While the Project is not subject to the requirements of the DTLA 2040 CPIO Public Benefits Incentive Program, the Project is consistent with the standards raised by commenter. Specifically, the Project would provide a public restroom and drinking water fountain in Buildings 3 and 7, and such locations are directly accessible from the Project's publicly-accessible open space. Moreover, approximately 29 percent of the Project's publicly-accessible open space area would be shaded at noon during the summer solstice.

Comment No. ORG 2B-37

DISPLACEMENT

The Project claims less than significant impacts on the environment due its infill development strategy, as well as additional benefits to the City such as increased housing. However, this assessment does not take indirect residential and commercial displacement into account, and is therefore insufficient. Indirect displacement is a well documented phenomenon - particularly in projects of this scale and where there is such a marked disconnect between the project and its surroundings. As communicated by the developer, the majority of the 1,521 units built will be market-rate housing and thus will have a minimal contribution towards the City's affordable housing goals. Any contribution of affordable housing will most likely be offset by the level of indirect displacement that this project will trigger.

Response to Comment No. ORG 2B-37

This comment reiterates the indirect displacement concerns expressed in Comment Nos. ORG 1B-10 and IB-11. Refer to Response to Comment No. ORG 1B-10 and Response to Comment No. ORG 1B-11 included in the Little Tokyo Service Center letter dated December 12, 2023.

Comment No. ORG 2B-38

Furthermore, the Project has indicated it will comply with the affordable housing minimums required under Measure JJJ, yet the Project's Draft EIR does not specify the planned income targeting levels of the affordable units. In a neighborhood where the majority of adjacent rents are far below the market, even a so-called "affordable rent" may actually have the effect of increasing the local median rent and thereby displacing nearby tenants. Without knowing the specific rents of the designated affordable units or the market rate units, it is impossible to analyze the potential impact this project will have on housing affordability in the surrounding neighborhoods. However, the details provided in the Draft EIR's Project Description include amenities that are consistent with high-end, luxury rental residences:

- *"Amenities provided throughout the open space area would include trees, landscaping, dining patios, raised planters, wood benches, umbrellas, cabanas, decking, artificial and natural turf, and a broad range of paver types (circular, pebble, concrete, etc.). There would be a total of 12 individually curated publicly-accessible open space areas" (II-37, 38)*

- *"As shown on Figure II-10, the South Site would feature three centrally located public open space areas, referred to as the Central Courtyard, Fashion Plaza and Pop-Up Plaza. The 15,929 sf Central Courtyard would feature a strong linear tree canopy, outdoor dining on its edges, and large art installations. The 7,712 sf Fashion Plaza would feature boutique shop displays and passive gardens. The*

Pop-Up Plaza (8,675 sf) would feature an open- air artisan market, boutique shop displays, moveable flexible furniture and overhead art." (II-39)

- *"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." (II-40)*

Response to Comment No. ORG 2B-38

This comment reiterates the concern with the sufficiency of information regarding the Project's affordable housing units expressed in Comment ORG 1B-11. Refer to Response to Comment No. ORG 1B-11 included in the Little Tokyo Service Center letter dated December 12, 2023. The comment also summarizes the Project's open space features. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 2B-39

Additionally, the Project will have an undeniable impact on the small businesses in the surrounding neighborhoods. Little Tokyo is well known for its density of small businesses– many of which have been operating in the community for generations. They are a critical part of the fabric of the community and unique to this particular neighborhood. Unfortunately, because of real estate speculation which has been triggered by the past two decades of new development in the region and exacerbated by the recent opening of the Metro Regional Connector, many small businesses have been displaced over the past several years. In order to understand the impact that this project will have on small business in the community, we need to understand the rent structures, size of retail spaces, and tenant recruitment/marketing plans. Without concrete assurances that this project will not trigger business displacement – or that the developer will mitigate said effects, it must be concluded that the project will have potentially significant impacts on the local environment.

Response to Comment No. ORG 2B-39

This comment reiterates the indirect business displacement concerns expressed in Comment No. ORG 1B-10. Refer to Response to Comment No. ORG 1B-10 included in the Little Tokyo Service Center letter dated December 12, 2023.

Comment No. ORG 2B-40

CONCLUSION

As caretakers and descendants of those who created this community, it is deeply important to us that Little Tokyo is not negatively impacted by future development and its character is preserved. Little Tokyo is one of the last 3 remaining Japantowns in the U.S.,

and as redevelopment occurs in Los Angeles and elsewhere, it has become a threatened cultural and historic resource.

The 4th and Central Project will have a significant environmental impact on the neighborhood of Little Tokyo. As proposed, it is incompatible with Little Tokyo and other surrounding neighborhoods such as Skid Row. The Project minimizes its aesthetic impacts on cultural and historic resources nearby, and failed to include Little Tokyo in this analysis. Its impacts on future traffic and congestion are minimized, using generalized data and assumptions that its inhabitants will utilize local transit. However, it fails to consider that the area is dominated by industrial use, surrounded by streets that are identified by the City as unsafe and have a higher share of injuries and fatalities than the majority of streets in Los Angeles. The Project also fails to show a clear strategy of how it will encourage residents, tenants, and visitors to use non-vehicular, active transportation modes in this environment. These failings, in addition to the LADOT's separate Level of Service analysis, will result in exacerbating existing air quality issues in a recognized Environmental Justice community.

Response to Comment No. ORG 2B-40

This comment provides a conclusory overview of the comments provided within the LTCC letter, with general references to the more detailed comments provided in Comment Nos. ORG 2B-4 to 2B-28. Specific issues raised include impacts related to aesthetics, cultural resources, land use compatibility, transportation, and air quality. Refer to Response Comment Nos. ORG 2B-4 to 2B-28, which address these comments. As demonstrated therein, the comments do not present substantial evidence that there is a new significant impact that was not disclosed in the Draft EIR, an increase in the severity of an impact identified in the Draft EIR, or that the Draft EIR is fundamentally flawed in any material way.

Comment No. ORG 2B-41

Additionally, the Project's construction impacts will have an enormous impact on the surrounding neighborhoods, and the mitigations it proposes are insufficient to the many residents, small businesses, and visitors who attend our day care centers, temples, churches, and community institutions who will suffer through the dust, dirt, fumes, noise, vibrations that will be occurring every day, Monday through Saturday.

Response to Comment No. ORG 2B-41

This comment reiterates the commenter's concerns for construction impacts, which are provided in detail in Comment Nos. ORG 2B-29 to ORG 2B-32. Refer to Response to Comment Nos. ORG 2B-29 to ORG 2B-32.

Comment No. ORG 2B-42

To be clear, LTCC supports housing growth in Los Angeles. We recognize the severity of the regional housing affordability crisis, especially amongst low- and middle-income families who are feeling the effects of inflation, higher rents, and record home prices. However - this project does very little to address that crisis. This is a luxury offering next to Skid Row, providing luxury apartments and amenities many, many Angelenos cannot afford. With an estimated 46,260 unhoused people in Los Angeles,[13] this Project is out of touch with the current needs of the City, and it fails to connect with its surrounding neighborhoods. Its open space plans are commercially focused, and will do more to serve dogs than families.

Given the disproportionate impact that the Project will have on two communities of color which have also borne the brunt of decades of systemic racism in City Planning, if the Planning Department is to follow its stated goal of racial equity[14], it must follow the lead of those who are most affected by this project and ensure that the developer is responsive to the concerns we raise herein.

Thank you for your consideration of these comments. We look forward to reviewing the revisions to the Draft EIR.

[13] https://www.lahsa.org/news?article=927-lahsa-releases-results-of-2023-greater-los-angeles-homelesscount#:~:text=LOS%20ANGELES%20%E2%80%93%20The%202023%20Greater,to%20an%20estimated%2046%2C260%20people.

[14] https://planning.lacity.org/resources/racial-justice

Response to Comment No. ORG 2B-42

This comment states LTCC supports housing growth in Los Angeles but contends the Project offers luxury apartments and amenities that many cannot afford. The commenter is referred to Response to Comment No, 1B-11, which discusses how the Project would provide a variety of housing options, including affordable housing.

The commenter also raises concerns over impacts to communities of color.

As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nevertheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment Letter No. ORG 3

For Skid Row Now & 2040
Henriette Brouwers
Received November 9, 2023

Comment No. ORG 3-1

On behalf of the undersigned coalition, we submit this request for an extension to the provided 45-day public comment review period for the Draft Environmental Impact Report ("DEIR") on the proposed mixed-use Fourth & Central Project at 400 S. Central Avenue, Case No. ENV-2021-4071-EIR.

The coalition making this request represents a diverse cross-section stakeholders in the neighborhood immediately adjacent to the proposed project and will be those most impacted by any new development at this location.

Skid Row Now & 2040 is a coalition of Skid Row grassroots groups and residents, including Los Angeles Poverty Department, United Coalition East Prevention Project, Los Angeles Catholic Worker, Los Angeles Community Action Network and other Skid Row residents and leaders that has been in dialogue with the Los Angeles Department of City Planning, the City's Planning Commissioners and City Council, as the City has been developing its new zoning and downtown community plan, DTLA2040 Community Plan. The Skid Row Now & 2040 coalition was formed to ensure that the concerns and vision of current Skid Row residents are incorporated into the City's plan.

The California Environmental Quality Act (“CEQA”) requires a transparent and engaging public review process, and it strongly emphasizes the importance of public comments and participation. The proposed project is of a nearly unprecedented size and scale for the immediate surrounds. It encompasses over 7.5 acres, would require demolition of existing structures, and would develop 10 different buildings totaling over 2 million square feet of floor area of a wide mix of uses including residential, office, retail, restaurant, hotel, open space, and both subterranean and above-grade parking. Furthermore, the project is requesting significant discretionary approvals from the City and would dramatically alter the underlying General Plan land use designation and zoning of the site. These proposed significant changes and their potential impacts require the careful consideration of the public.

The DEIR released is over 1,000 pages in length, not including the over 3,000 pages of substantive appendices. As of the writing of this request, two of the Appendices (E. and I.) are inaccessible on the City's website and therefore not reviewable by the public.[1] The surrounding community is diverse, speaking languages other than English and with a wide range of backgrounds in land use, planning, and real estate development. However, the community is clear in its interest in understanding all of the potential impacts this proposed project will have on their neighborhood and lives. Given that the DEIR is not made available in other languages and is a highly technical document, community

organizations - many of whom are submitting this extension request - will bear the burden of translating the document, both into multiple non-English languages and into more accessible and understandable vocabulary for our diverse residents and constituents.

Therefore, the current allocated time period for public review and comment is insufficient to allow for adequate and meaningful public review, analysis, and preparation of comments on this proposed development of much concern to the community.

As such, we respectfully request that the public comment period be extended to allow for a 90-day total public comment period - excluding the Thanksgiving, Christmas, and New Year's holidays - resulting in a new deadline of January 15, 2024.

Response to Comment No. ORG 3-1

The comment requests an extension of the Draft EIR Comment period. The original public review comment period was extended by the City to end on December 11, 2023. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter dated November 16, 2023 for further discussion of the Project's Draft EIR comment period extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines.

In addition, the commenter indicates that two of the Draft EIR appendices were inaccessible on the City's website and, therefore, not reviewable by the public at the time of the comment letter preparation. These two appendices, the Paleontological Resources Assessment (Appendix E) and Public Service Correspondence (Appendix I), were immediately corrected to be accessible on the City's website in early November 2023. Furthermore, hardcopies of the entire Draft EIR, including all appendices were made available at three public libraries, as well as at the City's Department of Planning office by appointment since the beginning of the public comment period. As stated on the Notice of Availability and Notice of Extension documents, "If you are unable to access digital copies of the Draft EIR, the Department will attempt to make reasonable arrangements to view the documents. In addition, physical copies of the Draft EIR and case file can still be viewed at City offices. The Department has implemented additional measures to ensure the safety of the public viewing physical case files, necessitating appointments."

Comment No. ORG 3-2

Attachment

Cold Storage DEIR Comment Period Ext request_template rev11-2

Response to Comment No. ORG 3-2

The attached comment letter includes a copy of Comment No. ORG 3-1. Please refer to Response to Comment No. ORG 3-1, which addresses the comments in the attached letter.

Comment Letter No. ORG 4

Riverside Neighbors Opposing Warehouses
Mike McCarthy
Received November 26, 2023

Comment No. ORG 4-1

Attached please find a public comment on record regarding the Draft EIR for the Fourth and Central Project.

Please verify receipt of this email and attached comment letter.

Response to Comment No. ORG 4-1

The comment introduces the letter from Riverside Neighbors Opposing Warehouses, which is addressed in Response to Comment Nos. ORG 4-2 to ORG 4-6 below.

Comment No. ORG 4-2

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (EIR) on the Fourth and Central Project (the Project). The Project would demolish existing cold storage warehouses and replace them with a mix of residential, office, restaurant/retail, and hotel uses on 7.6 acres located in central Los Angeles.

This letter asks the lead agency to examine and document (1) whether comparable industrial land will be made available elsewhere in central Los Angeles to replace the lost warehouses, (2) whether the project applicant, current owners, or any related financial entities of the existing cold storage warehouses at the project site intend to 'find a new home at a more fitting location'[1] that will transfer, and potentially increase, the existing greenhouse gases and air quality impacts elsewhere within the south coast air basin by moving the warehouse operations inland, and (3) accurately characterize the project scope and cumulative impact of the project if new warehouses or existing cold storage warehouses elsewhere in (or adjacent to) the basin will replace the current cold storage warehouses at the project site.

I would like to make sure I fully understand the scope of the project which forms the basis for the greenhouse gas and air quality analysis of project impacts. Of primary importance is the question of whether this 'project' EIR is piecemealing the full impacts of the project by separating the demolition of the current cold storage warehouses with the future operation of cold storage warehouses elsewhere in the South Coast Air Basin or adjacent counties. If so, the project EIR is misrepresenting the project's air quality and GHG impacts and should include future warehouse operations to fully characterize project impacts.

[1] https://www.latimes.com/business/story/2021-04-29/fourth-central-development-arts-district

Response to Comment No. ORG 4-2

This comment introduces comments provided within this letter. Specifically, the commenter questions whether the Draft EIR is piecemealing the Project's impacts if the existing Project Site uses are going to be replaced by new cold storage facilities elsewhere in the South Coast Air Basin. With implementation of the Project, the existing cold storage facilities would be removed from the Project Site. The commenter cites to articles in the Los Angeles Times from April 29, 2021 as evidence of an intent to move the current cold storage uses and continue operations. However, t he existing facility operator has not taken any action to move the current site operations to another site within the Basin or chosen a potential relocation site, and the existing facility operator and Project Applicant have each submitted a signed letter to the Los Angeles Department of City Planning confirming that there are no plans to relocate the LACS facilities elsewhere.[36] As such, moving and continuing existing operations from the project site is speculative and not foreseeable, and is not properly part of the scope of the project. Because there is no evidence that the current site operations would be replaced or relocated, any analysis of potential replacement project impacts would be speculation; pursuant to CEQA Guidelines Section 15145, if "a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." Furthermore, the Draft EIR's evaluation of air quality and GHG impacts is based on the questions set forth in Appendix G of the CEQA Guidelines, as utilized by the City of Los Angeles in their CEQA documents. As evaluated in Section IV.A, *Air Quality*, and Section IV.E, *Greenhouse Gas Emissions*, with supporting documentation provided in Appendix B, Air Quality/Greenhouse Gas Emissions Technical Documentation, of the Draft EIR, air quality and GHG impacts have been fully evaluated . Thus, the Draft EIR did not misrepresent the Project's air quality and GHG emissions impacts as evaluated in the Draft EIR.

In addition, refer to Appendix C of this Final EIR for air quality and GHG emissions technical data associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any new significant or substantially increased impacts as compared to the Draft EIR.

Comment No. ORG 4-3

Project List is Incomplete

Figure III-1 in the EIR shows the cumulative development location map. However, this map is insufficient to look at the cumulative impacts of the project within the spatial contexts described in the air quality context – which is defined as the South Coast Air

[36] Letter from CP LA Cold Storage Land, LLC to Los Angeles Department of City Planning, dated September 25, 2024, and letter from Standard-Southern Corporation to Los Angeles Department of City Planning, dated October 17, 2024.

Basin. It is also insufficient to identify the traffic impacts, which can reasonably be considered the existing distances for heavy-duty trucks that service the cold-storage warehouses currently on site as described in the default CalEEMod trip distances displayed in Appendix B – p.37.



Figure III-1 from the project EIR.

The draft EIR describes the Cumulative Impacts methodology in Section 4.0, lists the projects considered for cumulative impacts in Table III-1. Upon review, Table III-1 omits hundreds of millions of square feet of past, present, and probable future warehouses projects located within Los Angeles County, and hundreds of millions of square feet of warehouse projects that are planned within the South Coast Air Basin, largely in San Bernardino or Riverside counties, that reflect the geographic scope of cold storage warehouses uses within the region. The existing cold storage warehouses on site are centrally located to downtown Los Angeles and thus result in shorter truck trips than the bulk of future planned warehouses that are largely located in the 'hinterlands' – average distances of new warehouses to the Ports of LA and Long Beach are 65+ miles.

Figure 1 shows the existing warehouse footprint based on the Warehouse CITY^2 tool v1.16 – an open data product based on county assessor parcel information and CEQANET environmental documents. The list of immediate vicinity projects omits existing warehouses within the district, of which there are over 100 individual warehouses within 3 miles of the existing project, totaling more than 12M square feet of space. Of note, there are no warehouses planned or approved within 6 miles of the project location despite there being a huge demand for warehouse space in southern California.

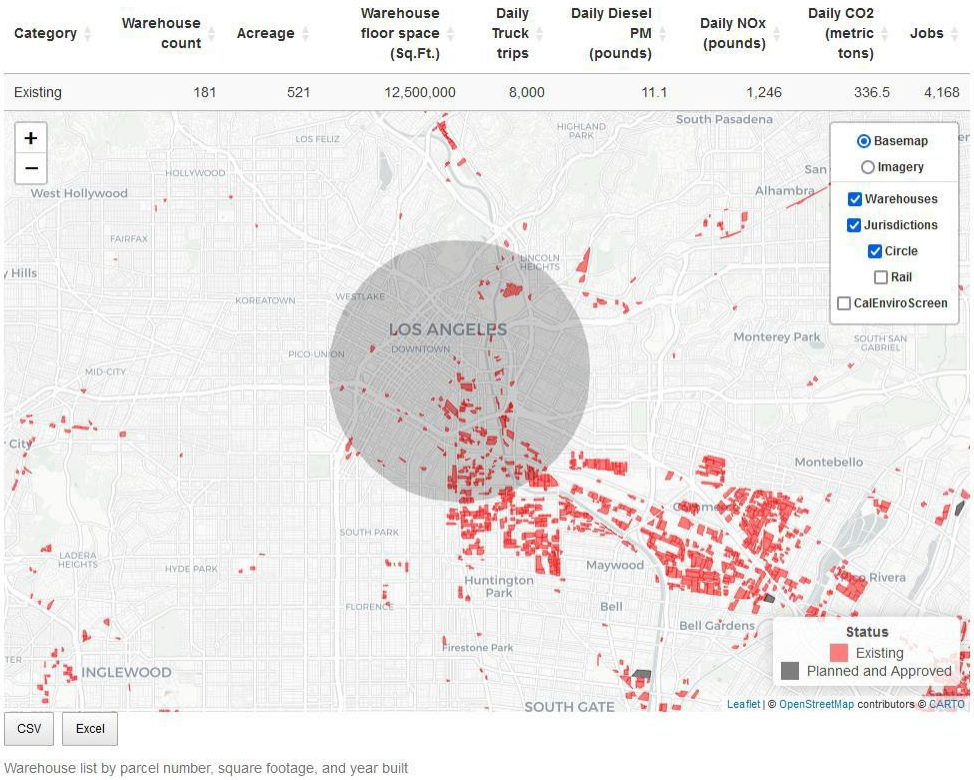

Figure 1 - Map of project area, surrounded by a 5-km buffer (grey circle). Existing warehouses are shown in red, planned warehouses are in black.

[2] https://radicalresearch.shinyapps.io/WarehouseCITY/

Response to Comment No. ORG 4-3

This comment states that the list of related projects in the Draft EIR is incomplete for evaluating cumulative impacts related to transportation and air quality. The methodology for the list of related projects is discussed on pages III-4 to III-5 in Chapter III, *Environmental Setting*, of the Draft EIR. As discussed therein, pursuant to Section 15130 of the CEQA Guidelines, cumulative impacts are based on either a list of past, present, and probable future projects producing related or cumulative impacts or a summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect.

Cumulative study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area for each individual environmental impact issue may vary. For example, a cumulative schools impact may only affect the schools serving the project site, while a cumulative air quality impact may affect the entire South Coast Air Basin. The specific boundaries and the projected growth within those boundaries for the cumulative study area of each environmental issue are identified in the applicable environmental issue section in Chapter IV*, Environmental Impact Analysis*, of the Draft EIR.

For the Project, the Los Angeles Department of City Planning derived a list of related projects according to a geographic radius of one-half mile of the Project Site plus one-quarter mile from the farthest outlying intersection in accordance with LADOT Transportation Assessment Guidelines (TAG). The study area radius is common for project EIRs throughout the City. The study area under the TAG provides an accurate picture of development projects that are located within a physical radius which could affect conditions in the project area and which were considered for analysis of cumulative impacts . The list of related projects was used for the majority of the environmental issues evaluated in the Draft EIR, including for Transportation impacts.

However, with regard to air quality impacts, since both the specific timing and the sequencing of the construction of the related projects are unknown, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. Accordingly, the SCAQMD recommends using two methodologies to assess the cumulative impact of air quality emissions: (1) a project's consistency with the current AQMP be used to determine its potential cumulative impacts or (2) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality. Cumulative impacts for air quality were evaluated in the Draft EIR in accordance with the SCAQMD methodology, and therefore a separate analysis to calculate emissions for nearby past, present, and future warehouse uses in the area is not warranted.

In addition, the analysis of GHG emissions is cumulative in nature because impacts are caused by cumulative global emissions, and climate change impacts related to GHG emissions do not necessarily occur in the same area as the location of a project. Thus, cumulative GHG impacts are addressed by evaluating the Project's potential to conflict with applicable regulatory plans and policies to reduce GHG emissions, such as the Climate Change Scoping Plan, the 2020–2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. Refer also to Response to Comment No. ORG 4-4 below, which provides additional discussions of the Project's contribution to cumulative air quality and GHG impacts.

Comment No. ORG 4-4

Regional Impacts

In addition to immediate vicinity geographic impacts, multiple environmental resources drastically underestimated the regional impact of past, present, and probable future projects on the air quality of residents in the inland communities.

If, as suggested by the Los Angeles Times article, the LA cold storage company is planning on moving the warehouse to a 'more fitting location', that location is more likely than not to be in the Inland Empire.

Figure 2 shows a regional warehouse map of warehouses, which indicates that the bulk of warehouse projects are currently being placed in Inland Counties. Over 90% of planned and approved warehouse square footage is being sited in Inland Counties, which suffer from poorer air quality (ozone, NO2, PM2.5, and PM10). If the planned Fourth and Central project is simply displacing the existing warehouses from central Los Angeles to a warehouse location further inland, its claimed air quality analysis is incomplete and incorrect. Heavy-duty truck VMT will increase because of the shift inland, and the air quality and greenhouse impacts will be net higher than if the project was not built.

Category	Warehouse count	Acreage	Warehouse floor space (Sq.Ft.)	Daily Truck trips	Daily Diesel PM (pounds)	Daily NOx (pounds)	Daily CO2 (metric tons)	Jobs
Existing	9,016	59,362	1,422,200,000	953,000	1318.2	148,477	40080.4	474,896
Planned and Approved	289	14,644	350,800,000	235,000	325.1	36,613	9883.4	117,152

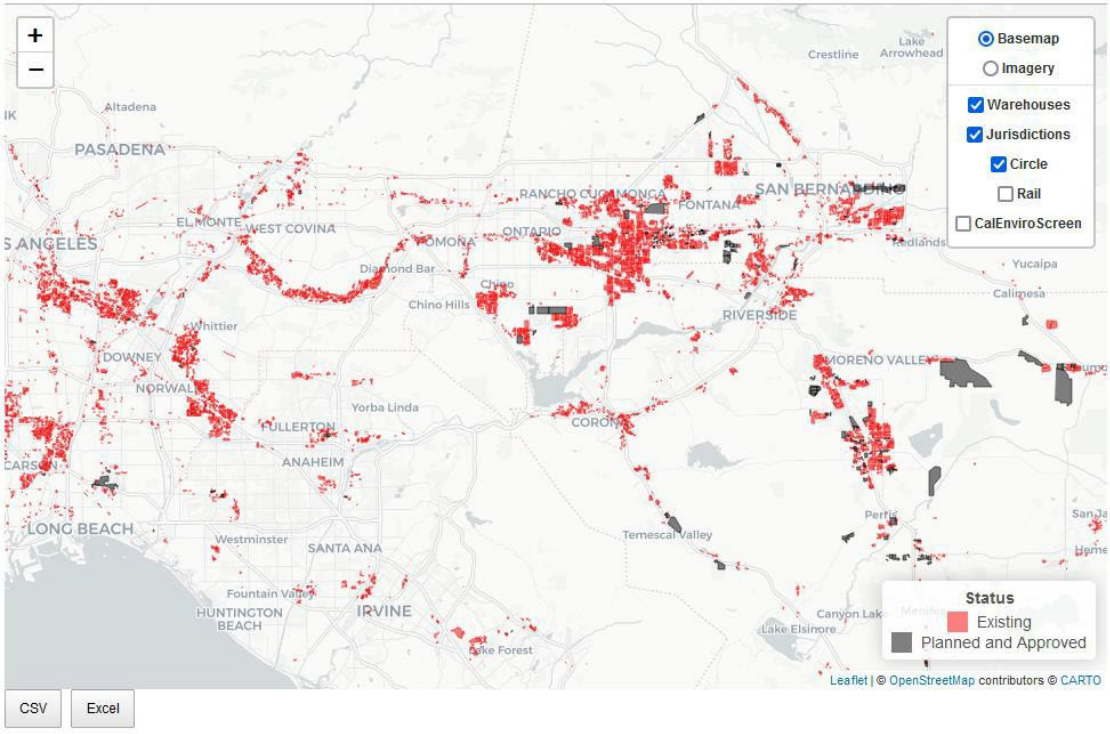

Figure 2 – Map of regional existing warehouses (red) and planned/approved and under construction warehouses (black). More than 90% of the future warehouse footprint is in the Inland Counties which is disproportionately shifting air quality and congestion impacts inland to poorer communities of color.

Response to Comment No. ORG 4-4

This comment states that the Draft EIR underestimated the Project's regional air quality impacts if the existing Project Site uses are going to be replaced by new cold storage facilities in the South Coast Air Basin. Refer to Response to Comment No. ORG 4-2, regarding the CEQA Guidelines' direction with respect to speculation.

Project regional operational air quality impacts were analyzed in Sections IV.A, *Air Quality*, of the Draft EIR. With regards to cumulative air quality impacts, the Project's cumulative air quality impacts were analyzed based on SCAQMD's either one of the two recommended methodologies to assess the cumulative impact of air quality emissions: (1) a project's consistency with the current AQMP be used to determine its potential cumulative impacts, or (2) that project-specific air quality impacts be used to determine the project's potential cumulative impacts to regional air quality.[37] For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's cumulative air quality impacts were determined not to be significant based on its consistency with the SCAQMD's adopted 2016 and 2022 AQMPs. As described in Section IV.A, *Air Quality*, the Project's increase in population, housing, and employment would be consistent with both the 2016-2040 and 2020-2045 RTP/SCS growth projections, upon which the 2016 AQMP and 2022 AQMP are based. As discussed in Threshold (a) beginning on page IV.V-45 of the Draft EIR, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for ozone. Therefore, the Project would be consistent with and would not conflict with or obstruct implementation of the applicable AQMP. Accordingly, under this methodology, Project air quality impacts are not cumulatively considerable and cumulative impacts are less than significant.

However, the SCAQMD also recommends evaluating cumulative impacts for individual projects based on whether the project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts for those pollutants for which the Air Basin is in non-attainment. Thus, the cumulative analysis of air quality impacts follows SCAQMD's guidance such that construction or operational Project emissions would be considered cumulatively considerable if Project-specific emissions exceed an applicable SCAQMD recommended significance threshold. The City has opted to rely on thresholds established by the SCAQMD (refer to CEQA Guidelines Section 15064.7) to assess the Project's cumulative impacts. Tables IV.A-12, IV.A-14 through IV.A-20, and IV.A-27 through IV.A-32 have been updated in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. As shown in updated Tables IV.A-27 through IV.A-31 in Section IV.A, *Air Quality*, construction of the Project would not result in an exceedance of localized significance thresholds with the implementation of Mitigation Measure AQ-MM-1. Mitigation Measure AQ-MM-1 has been revised in this Final EIR to include feasible electric emission-free construction equipment (please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR for additional information regarding Project design modifications and revised Mitigation Measure AQ-MM-1). As shown in updated Tables IV.A-14 through Table IV.A-18, with

37 SCAQMD, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, Appendix D, 2003, page D-3 ("As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the Project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.").

implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features) and AQ-MM-2 (Concrete Truck Features), 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 updated Tables IV.A-12 and Table IV.A-19, with implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features), AQ-MM-2 (Concrete Truck Features), AQ-MM-3 (Emergency Generator Maintenance & Testing), AQ-MM-4 (Electric Landscaping Equipment) and AQ-MM-5 (Use of Super-Compliant VOC Paints) regional emissions of NO_X and CO for interim operations with concurrent construction activities would not exceed the significance thresholds with mitigation. Therefore, cumulative impacts related to regional NO_X and CO from interim operations emissions would be less than significant with mitigation. For operations, as shown in updated 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 updated 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. Therefore, the Project's cumulative air quality impacts and feasible and appropriate mitigation measures were discussed sufficiently in the Project's EIR.

Regarding the Project's cumulative GHG emissions impact, as explained on page IV.E-102 of Section IV.E, *Greenhouse Gas Emissions*, of the Draft EIR, analysis of GHG emissions is cumulative in nature because impacts are caused by cumulative global emissions and additionally, climate change impacts related to GHG emissions do not necessarily occur in the same area as the project is located. Given that the Project would not conflict with applicable reduction plans and policies and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively GHG emissions would be less than significant. Further, as explained on page IV.E-103, *Greenhouse Gas Emissions*, currently, there are no applicable CARB, SCAQMD, or City significance thresholds or specific reduction targets, or approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced

emissions. Therefore, consistent with CEQA Guidelines Section 15064h(3),[38] the City, as lead agency, has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project would not conflict with the applicable regulatory plans and policies to reduce GHG emissions: Climate Change Scoping Plan, the 2020–2045 RTP/SCS, City's Green New Deal, and the Los Angeles Green Building Code. Thus, as determined in Section IV.E, *Greenhouse Gas Emissions*, the Project's consistency with applicable GHG reduction plans and policies demonstrated that the Project does not conflict with regulations and policies and complies with or exceeds the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2025–2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code, and in the absence of adopted standards and established significance thresholds, and given this consistency, the Project's impacts would not be cumulatively considerable, and, therefore, the Project's cumulative GHG emissions impacts would be less than significant. In addition to the evaluation of the Project's consistency with plans adopted for the purpose of reducing and/or mitigating GHG emissions, for informational purposes, the analysis also quantified the amount of GHG emissions that would be attributable to the Project. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which requires a good-faith effort by the lead agency to describe and calculate emissions. The Draft EIR modeled GHG emissions without and with these regulatory changes to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. Therefore, the Project's cumulative GHG impacts were discussed sufficiently in the Project's Draft EIR. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

In addition, refer to Appendix C of this Final EIR for air quality and GHG emissions technical data associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications will not result in any significant new or substantially increased impacts.

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38 As indicated above, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction program renders a cumulative impact insignificant. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."

Furthermore, discretionary warehouse projects under CEQA would also be required to assess and disclose project-level and cumulative air quality and GHG impacts as with the Project, as well as determine consistency with the 2022 AQMP, applicable GHG reduction plans and policies, such as the 2022 Scoping Plan, 2024-2050 RTP/SCS, and, for projects within the City, the City's Green New Deal and the Los Angeles Green Building Code. For projects outside of the City limits, compliance with similar State and local building codes would be required along with the provision of mitigation measures if significant impacts are identified.

Comment No. ORG 4-5

CEQA Requirements

The California Office of Planning and Research website states that CEQA 'is intended to inform government decisionmakers and the public about the potential environmental effects of proposed activities and to prevent significant, avoidable environmental damage.'

Moreover, section 15355 of CEQA states that 'the cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.'

The cumulative impact of replacing cold storage warehouses in Central Los Angeles with cold storage warehouses in Inland Counties will be to increase net air quality and GHG emissions by requiring longer truck trip distances, and to disproportionately impact the residents of Riverside and San Bernardino County by displacing industrial zoning inland. This pattern has been occurring over the last 25 years. By choosing to replace this industrial warehouse zone with infill that is non-industrial, this project will continue this pattern of harm. It is important for it to be appropriately documented for government decision makers that the demolished warehouse will not be net zero or beneficial but will most likely merely increase the total GHG and air quality impacts by shifting yet more industrial warehouse space to an Inland community.

Response to Comment No. ORG 4-5

This comment states that there would be cumulative air quality and GHG emissions if the Project's industrial uses are shifted to an Inland community. Refer to Response to Comment Nos. ORG 4-2, ORG 4-3, and ORG 4-4 which address these comments.

Comment No. ORG 4-6

Secondly, it is important that the Project disclose whether there are already concrete plans to move the LA Cold Storage facilities to a 'more fitting location' as alleged by the Los Angeles Times article. I ask that the Lead Agency discuss with the owner/operators of that facility and this project whether there is a location for the LA Cold Storage facility

to move to, to disclose where it is, and to disclose or attach any environmental documents created if that warehouse was built/approved in the last 5 years. Any emissions from a new warehouse project, including construction phase and operational phase emissions, should be included in any net impact analysis claimed by the environmental impact documents in this project to properly account for the project and to avoid the appearance of 'piecemeal' accounting as described in the CEQA definition of a project.[3] At present, this appears missing from the project documentation which raises the question of whether decisionmakers will have sufficient information to understand the true impacts of the project.

[3] In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis.

Response to Comment No. ORG 4-6

This comment states that the Project should disclose whether the existing Project Site uses are going to be moved to another location resulting in undisclosed air quality impacts. Refer to Response to Comment Nos. ORG 4-2 and ORG 4-3, which address these comments and the Project's air quality impacts.

Comment Letter No. ORG 5

Para Los Niños
Dan Nieman, Vice President, External Affairs
Received November 28, 2023

Comment No. ORG 5-1

Tamar- Thank you for the opportunity to provide comment on the project at 4th and Central (ENV-2021-407 1-EIR). Attached is the formal comment from Para Los Niños. Please let me know if you have any questions.

Response to Comment No. ORG 5-1

The comment introduces a comment letter submitted by Para Los Niños, which is addressed in Response to Comment No. ORG 5-2 below. Responses to the attached comment letter are provided below.

Comment No. ORG 5-2

Thank you for the opportunity to comment on the Fourth & Central project's draft environmental impact report. My name is Dan Nieman, and I am the Vice President of External Affairs of Para Los Niños, a non-profit organization providing education and comprehensive services to help children and families break the cycle of poverty in Los Angeles.

Para Los Niños began as a response to dire needs of children living in poverty (in the Skid Row area of downtown Los Angeles) and four decades later, our work continues to have a transformative impact on thousands of children, youth, and families through education, comprehensive wraparound family support and community-based transformation.

We operate 17 locations across Los Angeles County and several of our locations are located just blocks away from the project site. I am writing to express our satisfaction with the findings of the environmental impact report and our support for more housing, especially affordable housing, in this part of Downtown LA.

Our organization works on the front lines, helping children, youth, and families reach their full potential. We understand firsthand how much of an impact that the housing crisis continues to have on working-class families – some of our most vulnerable Angelenos. Housing insecurity is one of the greatest issues that the families we work with face. The city's high housing costs are prohibitive towards empowering families and fostering strong communities. Los Angeles is in desperate need of more affordable housing, especially residential units that are suitable for working-class families. This project provides exactly that. Hundreds of new low-income and workforce units are precisely what this area needs.

This project will create more housing opportunities for people like our teachers, custodial staff, and service providers.

Another key benefit of this project is its proximity to transit. Many of the low-income families we work with rely on public transit to get around the city, and this project sensibly locates affordable housing right where it needs to be. More housing options near major transit like the Metro Little Tokyo-Arts District station will enable a greater number of people to visit our organization's other locations across Los Angeles. Increased mobility and connectivity will benefit Angelenos like the families we work with the most.

At Para Los Niños, our goal is to strengthen and uplift communities through our work. This project and its myriad positive features will help us achieve that goal. Thank you for listening to our comments.

Response to Comment No. ORG 5-2

The comment expresses general support for the Project due to the inclusion of affordable housing and proximity to public transit. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment Letter No. ORG 6

Los Angeles/Orange Counties Building Trades Council
Annette H. Tijerina, Executive Secretary
1626 Beverly Blvd.
Los Angeles, CA 90026
Received December 4, 2023

Comment No. ORG 6-1

On behalf of Executive Secretary, Ernesto Medrano, please find the attached correspondence on the Fourth & Central Project: DEIR Comment from the Los Angeles/Orange Counties Building Trades Council.

Response to Comment No. ORG 6-1

The comment introduces the letter from the Los Angeles/Orange Counties Building Trades Council, which is addressed in Response to Comment No. ORG 6-2 below.

Comment No. ORG 6-2

The Los Angeles/Orange Counties Building and Construction Trades Council represents 150,000 skilled construction workers in 48 local unions and district councils.

We strongly support the Fourth & Central project.

Working with developers Continuum Partners and Los Angeles Cold Storage, our union members will transform the 7.6-acre site into a resilient, sustainable community that will provide a comprehensive mix of housing options and commercial space.

The Council and the developers have a full Project Labor Agreement for Fourth & Central that will generate more than 10,000 construction jobs, with $1 billion in total construction labor output.

The PLA especially targets hiring of veterans, local residents and graduates of the Council's approved apprenticeship-readiness training programs. These initiatives are proven to increase community participation in lifelong, well-paid union careers. This is a huge investment in the neighborhoods around Fourth & Central.

In addition to robust workforce recruitment, the Building Trades are also dedicated to providing new housing at all income levels, from extremely low income all the way to market rate. Fourth & Central will provide the greatest number of affordable housing units by a private developer in Downtown LA's history. In addition, for-sale condominiums will offer homeownership opportunities. All this will be done with absolutely no displacement of residents.

In summary, the Fourth & Central project is appropriate for its area and will bring huge economic benefits to Los Angeles. We urge the City of Los Angeles to continue the approval and review process and join us in breaking ground for Fourth & Central as soon as possible.

Response to Comment No. ORG 6-2

The comment expresses general support for the Project due to the generation of construction jobs and economic benefits provided by the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project .

Comment Letter No. ORG 7

Los Angeles Conservancy
Adrian Scott Fine, Senior Director of Advocacy
December 7, 2023

Comment No. ORG 7-1

Please find attached comments from the Los Angeles Conservancy regarding the Draft Environmental Impact Report (DEIR) for the Proposed Fourth & Central Project, ENV-2021- 4071-EIR.

Response to Comment No. ORG 7-1

The comment introduces the letter from the Los Angeles Conservancy, which is addressed in Response to Comment Nos. ORG 7-2 to ORG 7-9 below.

Comment No. ORG 7-2

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (DEIR) for the Proposed Fourth & Central Project (Project). As described in the DEIR, the Project would redevelop approximately 7.6 acres of land distributed across two project sites at the intersection of Fourth Street and Central Avenue adjacent to Little Tokyo and the Arts District. As proposed, the project would demolish the existing surface parking lot and cold storage facility uses on the West and South Sites, as well as the East Volume and North Wing of the Los Angeles Ice and Cold Storage Company (LASC) building on the North Site. If feasible, the plan would rehabilitate and adaptively reuse the West Volume of the Ice and Cold Storage Company building, a 1907 addition.

The Conservancy thanks the applicant and their project team for meeting and consulting with us to outline the project goals and potential constraints association with preservation and adaptive reuse. We appreciate this dialogue and look forward to additional collaboration as this project and review process proceeds.

Response to Comment No. ORG 7-2

This is an introductory comment to the Conservancy's comments with regard to the Project's intended adaptive reuse of a portion of the Los Angeles Ice and Cold Storage Company (LASC) building on the North Site. This introductory comment does not address the adequacy of the Draft EIR but is noted for the record. Specific comments regarding the Draft EIR are provided and responded to below and all comments will be forwarded to the decision-makers for review and consideration.

Comment No. ORG 7-3

The Conservancy supports new development and housing production in this area of the city and the mitigation measures outlined for the West Volume of the historic building. While we understand there is not a desire to reuse the East Volume and it is unlikely to be structurally feasible following the thawing process, we ask that the Final Environmental Impact Report (FEIR) outline equal mitigation measures to allow for consideration, potential rehabilitation, and adaptive reuse if determined structural sound. We also request that the FEIR include more detailed renderings of the proposed new buildings that demonstrate compatibility with the LACS building and industrial environment.

Response to Comment No. ORG 7-3

This comment requests that, similar to the mitigation measures for the portion of the Cold Storage building that is to be renovated (West Volume), mitigation measures be provided for the portion of the Cold Storage building that is to be demolished (East Volume) to allow for consideration, potential rehabilitation, and adaptive reuse of that portion of the building if it is determined to be structurally sound after thawing.

CEQA Guidelines Section 15126.4 requires the consideration of feasible mitigation measures in order to lessen or avoid the significant adverse impacts of a Project on the environment. The potential retention of the East Volume of the LACS Building is not feasible. The structural wood beams and columns are severely deteriorated due to their age and the interior condition of being frozen for more than a century. As analyzed in the Draft EIR, due to the extent and severity of the existing damage, the anticipated damage to the bricks and mortar once the building is thawed, and the programmatic requirements of the Project, the retention, rehabilitation, and adaptive reuse of the East Volume is not feasible or practical from a structural, economic, or historic preservation standpoint. Therefore, the Draft EIR did not include mitigation measures that would require the Applicant to explore the potential retention of the East Volume of the LACS.

With regard to Project renderings, the Draft EIR includes Figure II-15, View of Central Avenue at 4th Street, in Chapter II, *Project Description*, which illustrates the potential adaptive reuse of the West Volume. Also, Figure II-5, *Proposed Program Diagram*, and Figure II-17, *North Site Exterior Building Materials – Viewed from Central Avenue*, illustrate the massing of the buildings on the North Site. In accordance with the CEQA Guidelines Section 15151, the Project Description, including its figures, was prepared with a sufficient degree of analysis to provide decision makers with information to enable them to make a decision that intelligently takes account of environmental consequences. The evaluation of the environmental effects of the Project need not be exhaustive, but the sufficiency of the Draft EIR is to be reviewed in the light of what is reasonably feasible. Further, in accordance with Section 15124 of the CEQA Guidelines, the Draft EIR's Project Description is not required to supply extensive detail beyond that needed for evaluation and review of the environmental impacts of the Project. In this case, the Project's Historic Resources Technical Report was able to be prepared in a manner that

sufficiently analyzed the Project's impacts regarding historical resources, with mitigation measures prescribed, as feasible, to address the Project's impacts.

In response to public and agency comments received on the Draft EIR, design modifications have been made to the Project. These design modifications are provided in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. The design modifications include a reduction in height of Building 2 on the North Site from 44 stories to 30 stories. As shown, Figures II-15, II-5, and II-17 have been updated to reflect the reduced height of Building 2 on the North Site.

Additional renderings are not available at this time; however, the Project Applicant will provide additional illustrations of the Project's West Volume to the Los Angeles Conservancy should the Project be approved and the West Volume be adaptively reused, as the Project moves through the City's design review process.

Comment No. ORG 7-4

A. The Los Angeles Ice and Cold Storage Company plant is an identified eligible historic resource.

The Los Angeles Ice and Cold Storage Company building, located at 715 East Fourth Street, is a six-story brick masonry industrial building designed by architects George Wyman and Theodore Eisen and completed in 1903 (East Volume). In 1907, Wyman designed a six-story reinforced concrete addition, which was constructed by expert reinforced concrete builder Carl Leonardt (West Volume). In 2016, Architectural Resources Group identified the subject building as eligible for designation at the local, state, and national levels as an excellent example of a vernacular industrial building designed by master architects Eisen and Wyman. George Wyman's most notable work includes the iconic Bradbury Building on Broadway in downtown Los Angeles.

The cold storage industry grew alongside urbanization and the demand for fresh products. Early cold storage facilities were grouped on Central Avenue (between Fourth and Sixth Streets) and on Santa Fe (between First and Fourth Streets). Early cold storage facilities were located in close proximity to the Santa Fe rail line, brokers, distributors, and food processing plants. Established in 1895, the Los Angeles Ice and Cold Storage expanded in 1902, opening its $200,000 six-story plus basement building on the corner of Fourth and Central. The company expanded several times throughout the twentieth century becoming the city's most prominent cold storage company while maintaining its operations at 715 East Fourth Street until the 2010s. The subject property is one of the oldest cold storage properties in Los Angeles and provides a tangible link to the city's significant industrial and agricultural history.

Response to Comment No. ORG 7-4

This comment provides a summary of the historic significance of the LACS Building on the Project Site as noted in the Draft EIR and the Historic Resources Technical Report

included as Appendix C-1 to the DEIR. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 7-5

B. Mitigation Measures for the West Volume.

The Conservancy appreciates the thorough mitigation measures outlined for the West Volume. Interpretive mitigation measures include Historic American Building Survey (HABS) documentation, Level III standards, and the creation of publicly accessible interpretive programming of the LACS Building and Los Angeles Cold Storage.

Mitigation measures to determine the feasibility and hopeful adaptive reuse of the building are as follows: the Applicant will contract with a qualified structural engineer who meets the Secretary of the Interior's Historic Preservation Professional Standards in Engineering to prepare a "Thawing Plan," which will be reviewed by the Department of City Planning, Office of Historic Resources (OHR). A qualified structural engineer will then prepare a "Structural Analysis" which is to include a Compressive Strength of Concrete Test, Yield/Tensile Strength of Reinforcing Steel Test, and Foundation/Soil Sampling. The minimum thresholds for these tests that determine structural soundness are outlined in the DEIR. Both the testing methodology and results will be reviewed by OHR. Based on the results, the qualified structural engineer will determine the feasibility of preservation and adaptive reuse. If the Structural Analysis does not meet minimum thresholds, the Applicant may apply for demolition permits for the West Volume.

If the building is determined to be structurally sound, the applicant will contract a qualified historic architect who meets the Secretary of the Interior's Historic Preservation Professional Standards in Historic Architecture to prepare a Historic Structure Report (HSR) and Mothballing Plan, both to be reviewed by OHR. The historic architect will be responsible for overseeing implementation of the proposed rehabilitation and adaptive reuse. A qualified structural engineer will prepare a "Protection Plan" to mitigate impacts of nearby demolition, also to be reviewed by OHR.

According to the DEIR, the rehabilitated and adaptively reused building would retain significant exterior character-defining Industrial Vernacular and Neoclassical features of its north, west, and south façades. New window openings would be added for retail/commercial use, however this will be done in a manner to ensure the building would continue to convey its historic significance; this approach should meet the Secretary of the Interior's Standards and maintain historic eligibility status.

Response to Comment No. ORG 7-5

This comment provides a summary of the proposed mitigation for and description of the potential adaptive reuse of the West Volume of the LACS Building on the Project Site as noted in the Draft EIR and the Historic Resources Technical Report included as Appendix

C-1 to the DEIR. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR , no further response is necessary.

Comment No. ORG 7-6

C. Request for Equal Mitigation Measures for the East Volume.

As stated in the DEIR, the Ice and Cold Storage building is a significant historic resource. Demolition of the East Volume would destroy over 50% of the building's original fabric and constitute a "significant loss of integrity of design, materials, and workmanship to the LACS Building." Therefore, the Conservancy asks that the Applicant apply the same level of mitigation measures to the East Volume. The DEIR states that the 1903 brick masonry would be less likely to withstand thawing. A Thawing Plan and Structural Analysis, as described above, should be included in the FEIR to either validate the loss of the historic resources should the building not meet requirements of the Structural Analysis, or, if the building was deemed structurally sound, would allow it to be rehabilitated and reused and therefore avoid the adverse impacts described as "unavoidable" in the DEIR.

Response to Comment No. ORG 7-6

This comment requests mitigation measures for the East Volume. Please refer to Response to Comment No. ORG 7-3. As stated therein, due to extent and severity of the existing damage, the anticipated damage to the bricks and mortar once the building is thawed, and the programmatic requirements of the Project, the retention, rehabilitation, and adaptive reuse of the East Volume is not feasible or practical from a structural, economic, or historic preservation standpoint. Therefore, the Draft EIR did not include mitigation measures that would require the Applicant to explore the potential retention of the East Volume of the LACS.

Comment No. ORG 7-7

D. Compatibility of New Design

The Conservancy requests that the FEIR include greater detail for the ten contemporary buildings the Applicant would add to the Project Site. Currently, the DEIR states that the parking structure that would replace the East Volume would be subordinate to the West Volume in size and scale and would be compatible in massing. However, it also states that the design of the residential towers is not compatible with LACS Building. Given the large site for this Project, we urge the development team to reconsider the placement of the towers to achieve greater compatibility and development in scale with the historic building. We request to view, and comment on, renderings to ensure new infill development compliments the historic character of the LACS building and area.

Response to Comment No. ORG 7-7

This comment requests additional details of the Project's buildings and requests the Project to consider the placement of the towers to achieve greater compatibility and development in scale with the historic building. The commenter is referred to Response to Comment No. ORG 7-3, which discusses the Project's updated renderings and figures provided in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. The design modifications include a reduction in height of Building 2 on the North Site from 44 stories to 30 stories. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 7-8

E. Conclusion

The Los Angeles Ice and Cold Storage plant at 715 East Fourth Street is one of the oldest cold storage facilities in Los Angeles. It remains a tangible link to the city's industrial and agricultural history and is an eligible historic resource at the local, state, and national levels. Should the East Volume be demolished and the West Volume deemed structurally sound, the West Volume would be one of Los Angeles' last remaining links to that history.

The Conservancy requests that the mitigation measures proposed for the West Volume also be applied to the East Volume to demonstrate the Applicant's best effort to preserve and adaptively reuse the historic LACS building. We also request that the design of new construction be sensitive to the historic resource and the surrounding environment.

Response to Comment No. ORG 7-8

This comment provides a general comment on the LACS Building's historic value as one of the oldest cold storage facilities in Los Angeles. The comment also requests that mitigation measures for the West Volume be applied to the East Volume and that construction be sensitive to the historic resource and the surrounding environment. Please refer to Response to Comment No. ORG 7-3. As stated therein, due to extent and severity of the existing damage, the anticipated damage to the bricks and mortar once the building is thawed, and the programmatic requirements of the Project, the retention, rehabilitation, and adaptive reuse of the East Volume is not feasible or practical from a structural, economic, or historic preservation standpoint. Therefore, the Draft EIR did not include mitigation measures that would require the Applicant to explore the potential retention of the East Volume of the LACS.

Also, the Project's construction activities have been analyzed throughout the Draft EIR, with mitigation measures applied, as feasible, to reduce or eliminate significant environmental impacts.

Comment No. ORG 7-9

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Response to Comment No. ORG 7-9

The comment contains background information on the LA Conservancy and provides contact information. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project . As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment Letter No. ORG 8

Nikkei for Civil Rights and Redress
Kathy Masaoka, Co-Chair, Nikkei for Civil Rights & Redress
Received December 11, 2023

Comment No. ORG 8-1

NCRR is submitting our comment on the proposed construction at 4th and Central adjacent and in Little Tokyo and Skid Row. Please see attached public comments from NCRR and LTCC. Thank you.

Response to Comment No. ORG 8-1

The comment introduces the letter from the Nikkei for Civil Rights and Redress, which is addressed in Response to Comment Nos. ORG 8-2 to ORG 8-5 below.

Comment No. ORG 8-2

I am submitting this comment letter on behalf of Nikkei for Civil Rights and Redress (NCRR). NCRR was founded in 1980 to wage a grassroots campaign to obtain redress and reparations for the over 120,000 Japanese Americans unjustly incarcerated by the U.S. Government during World War II. In 1988 NCRR along with countless organizations and individuals realized success with the passage of the Civil Liberties Act of 1988. NCRR continues to support civil rights campaigns in the local Japanese American community as well as issues such as the anti- apartheid campaign, the redress of Korean comfort women, and we have also consistently followed quality of life issues in Little Tokyo.

We have a vested interest in - and history of - fighting for justice for the broader Nikkei community as well as the local community of Little Tokyo. With regards to the proposed 4th and Central Project, we stand with organizations such as the Little Tokyo Community Council, Nikkei Progressives, Little Tokyo Service Center - and call for the Planning Department to require the developer of this project to further demonstrate that they are mitigating the negative effects of this project and working with the communities of Little Tokyo and Skid Row to ensure that this is a project which will benefit both of these historic cultural communities of color.

Response to Comment No. ORG 8-2

This comment provides background information on the NCRR. The comment also makes a general statement that the developer of the Project should further demonstrate that they are mitigating the negative effects of the Project and working with the communities of Little Tokyo and Skid Row to ensure that the Project will benefit both of these historic cultural communities of color. The City has prepared a Draft EIR and this Final EIR in accordance with the requirements of CEQA, which adequately analyzes and discloses the Project impacts on the environment, which, when appropriate, addresses the nearby

communities, including the Little Tokyo and Skid Row communities. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 8-3

Relative to environmental impacts of the project, we find that the Draft EIR as submitted does NOT meet the standards articulated in the CA Environmental Quality Act (CEQA) guidelines for disclosure of a project's significant environmental effects.

We are supportive of and reiterate the concerns raised in the Little Tokyo Community Council's letter – submitted to you via email:

- Nearby stakeholders have not had adequate time to review the draft EIR
- The draft EIR does not adequately address the projects impact on cultural & historic resources – and egregiously does not recognize Little Tokyo as an adjacent cultural & historical district
- The draft EIR incorrectly analyzes its impact on traffic in the area
- The project as proposed inadequately addresses issues of pedestrian and bicycle connectivity with adjacent communities
- The draft EIR does not adequately address construction impacts of the project
- The project as proposed does not provide adequate detail about publicly accessible open spaces – specifically types of amenities that will be provided for community members who do not live on- site, especially those who are unhoused
- The draft EIR and project description do not provide any analysis of the shadow which the 40+ story tower will cast on the adjacent neighborhoods of Skid Row and Little Tokyo
- The draft EIR does not adequately address displacement concerns - particularly the indirect displacement of residents in the adjacent neighborhood and businesses in the adjacent neighborhood

In addition to the above comments - which were documented in more detail in the aforementioned letter from the Little Tokyo Community Council, NCRR *urges the Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package*.

Response to Comment No. ORG 8-3

This comment makes reference to issues raised in the comment letter provided by LTCC. Responses to LTCC's December 8, 2023 are provided in Response to Comment Nos. ORG 2B-2 to ORG 2B-42. It is also acknowledged that these comments are identical to a portion of Comment No. ORG 1B-4 and Comment Nos. ORG 1B-5 through ORG 1B-10. Thus, refer to Response to Comment Nos. ORG 1B-4 to ORG 1B-10 in the Little Tokyo Service Center letter dated December 12, 2023.

This comment also requests the City's Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package. This portion of the comment is identical to the last sentence of Comment No. ORG 1B-12. Refer to Response to Comment No. 1B-12 in the Little Tokyo Service Center comment letter dated December 11, 2023, which addresses this comment. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 8-4

This project is completely out of context with the surrounding communities of Little Tokyo and Skid Row – both in terms of its massive scale as well as its character. The proposed project will endanger the adjacent neighborhoods and overshadow the nearby area: putting residents, businesses, non-profits, other organizations and religious institutions at risk of displacement.

Given the disproportionately negative impact which the project will have on two historic communities of color – both of which have borne the brunt of decades of systemic racism in City Planning, if the Planning Department is to follow its stated goal of racial equity, it must follow the lead of those who are most affected by this project and ensure that the developer is responsive to these clearly articulated community concerns.

Thank you for your consideration of these comments. I look forward to reviewing the revisions to the Draft EIR.

Response to Comment No. ORG 8-4

This comment is identical to those provided in Comment Nos. ORG 1B-13 and ORG 1B-14. Refer to Response to Comment Nos. ORG 1B-13 and ORG 1B-14 in the Little Tokyo Service Center comment letter dated December 11, 2023. As noted therein, the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR. These modifications are shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nevertheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 8-5

Attachment

LTCC Cold Storage DEIR Public Comment

Response to Comment No. ORG 8-5

The attachment to this letter is a copy of the comment letter from the LTCC, dated December 8, 2023. Responses to the LTCC letter dated December 8, 2023 are provided in Responses to Comment Nos. ORG 2B-2 to ORG 2B-42. Please refer to responses therein, which address comments in LTCC's letter dated December 8, 2023.

Comment Letter No. ORG 9

Little Tokyo Business Association
David Ikegami, President
250 E. First Street, #201
Los Angeles, CA 90012
Received December 11, 2023

Comment No. ORG 9-1

Attached please find comments to the Fourth & Central Project draft environmental impact report from the Little Tokyo Business Association, managers of the Little Tokyo Business Improvement District.

Should you require additional information or have questions, feel free to contact me at the phone number and address listed below.

Response to Comment No. ORG 9-1

The comment introduces the letter from the Little Tokyo Business Association, which is addressed in Response to Comment No. ORG 9-2 below.

Comment No. ORG 9-2

After thoughtful and thorough review of the Fourth & Central Draft Environment Impact Report (DEIR), the Executive Committee of the Little Tokyo Business Association (LTBA) is pleased to express its support for the above referenced project which, in addition to complementing Metro's recent substantial transit investment, can help address the community's pressing housing needs and critical carbon emissions targets.

Established in 1959, LTBA manages the merchant-based Little Tokyo Business Improvement District that serves our district's approximately 400 stakeholder businesses by providing the safety ambassador program, street cleanup, and marketing, and liaisons with City and State agencies.

Along with our support, we remain mindful of the fact that, while the Little Tokyo BID’s southern boundary (northside of 3rd Street) abuts the Downtown Industrial district, the Project itself is not within the Little Tokyo district. However, we intend to work with the developer to ensure that construction, noise, traffic, and other potential negative impacts to our community are addressed in a timely manner as they may occur.

Response to Comment No. ORG 9-2

The comment expresses general support for the Project. As this comment does not raise any specific issues with respect to the content or adequacy of the Draft EIR, no further response is required. Nonetheless, the comment is noted for the record and will be

forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment Letter No. ORG 10

Japanese American National Museum
Ann Burroughs, President and CEO
100 North Central Avenue
Los Angeles, CA 90012
Received December 11, 2023

Comment No. ORG 10-1

I am submitting this comment letter on behalf of the Japanese American National Museum (JANM). JANM, which is located in Little Tokyo, was founded in 1985 and is dedicated to preserving the history and culture of Japanese Americans. In addition to being a world-class museum, JANM is also a social justice institution and committed to preserving the cultural and historical legacy of Little Tokyo as a gateway neighborhood for communities of color in the region.

We have a vested interest in - and history of - fighting for justice for the broader Nikkei community as well as the local community of Little Tokyo. With regards to the proposed 4th and Central Project, we stand with organizations such as the Little Tokyo Community Council, Nikkei Progressives, and Little Tokyo Service Center - and call for the Planning Department to require the developer of this project to further demonstrate that they are mitigating the negative effects of this project and working with the communities of Little Tokyo and Skid Row to ensure that this is a project which will benefit both of these historic cultural communities of color.

Response to Comment No. ORG 10-1

This comment provides background information on the JANM. The comment's 2nd paragraph regarding environmental effects to communities of color is identical to the 2nd paragraph in Comment No. ORG 8-2. Refer to Response to Comment No. ORG 8-2 in the Nikkei for Civil Rights and Redress comment letter dated December 11, 2023, which addresses this comment. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 10-2

Relative to environmental impacts of the project, we find that the Draft EIR as submitted does NOT meet the standards articulated in the CA Environmental Quality Act (CEQA) guidelines for disclosure of a project's significant environmental effects.

We are supportive of and reiterate the concerns raised in the Little Tokyo Community Council's letter - submitted to you via email:

- Nearby stakeholders have not had adequate time to review the draft EIR
- The draft EIR does not adequately address the projects impact on cultural & historic resources - and egregiously does not recognize Little Tokyo as an adjacent cultural & historical district
- The draft EIR incorrectly analyzes its impact on traffic in the area
- The project as proposed inadequately addresses issues of pedestrian and bicycle connectivity with adjacent communities
- The draft EIR does not adequately address construction impacts of the project
- The project as proposed does not provide adequate detail about publicly accessible open spaces - specifically types of amenities that will be provided for community members who do not live on-site, especially those who are unhoused
- The draft EIR and project description do not provide any analysis of the shadow which the 40+ story tower will cast on the adjacent neighborhoods of Skid Row and Little Tokyo
- The draft EIR does not adequately address displacement concerns - particularly the indirect displacement of residents in the adjacent neighborhood and businesses in the adjacent neighborhood

In addition to the above comments - which were documented in more detail in the aforementioned letter from the Little Tokyo Community Council, JANM ***urges the Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package***.

Response to Comment No. ORG 10-2

This comment is identical to Comment No. ORG 8-3. This comment makes reference to issues raised in the comment letter provided by LTCC. Responses to LTCC's December 8, 2023 letter are provided in Response to Comment Nos. ORG 2B-2 to ORG 2B-42. It is also acknowledged that these comments are identical to a portion of Comment No. ORG 1B-4 and Comment Nos. ORG 1B-5 through ORG 1B-10. Thus, refer to Response to Comment Nos. ORG 1B-4 to ORG 1B-10 in the Little Tokyo Service Center letter dated December 12, 2023.

This comment also requests the City's Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package. This portion of the comment is identical to the last

sentence of Comment No. ORG 1B-12. Refer to Response to Comment No. 1B-12 in the Little Tokyo Service Center comment letter dated December 11, 2023, which addresses this comment. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. ORG 10-3

This project is completely out of context with the surrounding communities of Little Tokyo and Skid Row - both in terms of its massive scale as well as its character. The proposed project will endanger the adjacent neighborhoods and overshadow the nearby area: putting residents, businesses, non-profits, other organizations and religious institutions at risk of displacement.

Given the disproportionately negative impact which the project will have on two historic communities of color - both of which have borne the brunt of decades of systemic racism in City Planning, if the Planning Department is to follow its stated goal of racial equity, it must follow the lead of those who are most affected by this project and ensure that the developer is responsive to these clearly articulated community concerns.

Thank you for your consideration of these comments. I look forward to reviewing the revisions to the Draft EIR.

Response to Comment No. ORG 10-3

This comment is identical to Comment No. ORG 8-4, which is also the same as those provided in Comment Nos. ORG 1B-13 and ORG 1B-14. Refer to Response to Comment Nos. ORG 1B-13 and ORG 1B-14 in the Little Tokyo Service Center comment letter dated December 11, 2023. As noted therein, the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR. These modifications are shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nevertheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 10-4

Attachment

JANM_ColdStorage_12.11.23

LTCC Cold Storage DEIR Public Comment

Response to Comment No. ORG 10-4

The first attachment is a copy of the JANM Letter dated December 11, 2023. Responses to the JANM letter dated December 11, 2023 are provided in Responses to Comment Nos. ORG 10-1 to ORG 10-3.

Comment No. ORG 10-5

Attachment

LTCC Cold Storage DEIR Public Comment

Response to Comment No. ORG 10-5

The attachment is a copy of the Letter from Little Tokyo Community Council (LTCC) dated December 8, 2023. Responses to the LTCC letter dated December 8, 2023 are provided in Responses to Comment Nos. ORG 2B-2 to ORG 2B-42.

Comment Letter No. ORG 11

J-Town Action and Solidarity
Gianna Furumoto, JAS Organizer
Received December 11, 2023

Comment No. ORG 11-1

I am submitting the enclosed letter as written public comment on the Fourth and Central Project (ENV-2021-4071-EIR) on behalf of J-Town Action and Solidarity. Please let us know if you have any questions or comments on the contents of the letter, and provide updates regarding the date(s) when this item will be on the City Planning Commission agenda.

Response to Comment No. ORG 11-1

The comment introduces the letter from J-Town Action and Solidarity, which is addressed in Response to Comment Nos. ORG 11-2 to ORG 11-6 below.

Comment No. ORG 11-2

J-Town Action and Solidarity (JAS), a grassroots organization comprised of residents, business owners, workers, and community members in Little Tokyo, is very alarmed about the impacts of the 4th and Central Project (Project) on our neighborhood. The proposed Project is of an unprecedented size and scale for the immediate surroundings and will negatively affect the Little Tokyo area. We first want to comment on the original duration of the public comment period. The Department of City Planning (DCP) and City Planning Commission (CPC) have historically liked to cite the Brown Act to justify providing insufficient, paltry public comment periods. The Draft Environmental Impact Report (DEIR) is over 1,000 pages in length, and filled with jargon incomprehensible to the everyday resident. The initially provided 45-day comment period for the DEIR of this project was nowhere near being a sufficient amount of time to review this document – both for our community members who can read and speak English and for those who read and speak in languages other than English. Moving forward, the DCP and CPC need to provide the public a reasonable amount of time to comment on projects such as the Cold Storage Project which will fundamentally change our environment at the whims of capital-hungry developers.

Response to Comment No. ORG 11-2

This comment provides background information on JAS. The comment also states the public review period for the Draft EIR was inadequate. The original public review comment period was extended by the City to end on December 11, 2023. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter dated November 16, 2023 for further discussion of the Project's Draft EIR comment period

extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines.

Comment No. ORG 11-3

90,113 SF of "publicly accessible" open space at the proposed site will bring an increase in surveillance and policing to an area where the local community consists mostly of African Amerikan [sic] residents. While the Project proposes beautification of the open space and sidewalk next to Skid Row – a place where access to basic infrastructure such as bathrooms, drinking water, and shade is already limited – these new amenities will likely not also be equally available to the surrounding residents because of this increase in security and policing. With more policing, and as current statistics from the LA City Controller's office for Council District 14 already show, there will inevitably be increased harassment of the nearby BIPOC communities. It appears to us that this Project aims to create an "open" or "community" space at the expense, exclusion, and unwarranted surveillance of existing residents. If this development were to be built, everyone – regardless of background – should be able to access its public space without fear of punishment or reprisal.

Response to Comment No. ORG 11-3

This comment expresses concern with increased policing of public open space, which the commenter speculates would result from the Project. According to CEQA Guidelines Sections 15131 and 15145, CEQA does not require that an EIR analyze social issues or engage in speculation. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nevertheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 11-4

While the draft Environmental Impact Report states that "no people or housing would be displaced…because there are no residential uses currently on the Project Site" (pp. IV.H-24), the Project will gentrify the neighborhoods immediately adjacent to it and has the potential to displace the long-time, working-class residents and small businesses who have been a part of their respective communities for several years. This includes the community members of Little Tokyo, Skid Row, the Fashion District, and others. The cumulative impacts of this project on housing in the surrounding areas must be analyzed; it is short-sighted and lacking due diligence to neglect such analysis. The Project's official website claims the Project will provide "dynamic placemaking" and "housing for all," but we know that – although the DEIR does not disclose how many "affordable" housing units will be provided – this development will be exclusive to those who can afford to live in such modern, ritzy high-rises. Moreover, what the developer and politicians choose to ignore is this: Los Angeles already has enough housing to house everyone. The problem is that LA's property is controlled by the capitalists. Empty yet livable property is hoarded by the few in order to generate a profit. Capitalists and landlords profit from the housing crisis.

Response to Comment No. ORG 11-4

This comment reiterates the indirect displacement concerns expressed in Comment Nos. ORG 1B-10 and ORG 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11 included in the Little Tokyo Service Center letter dated December 12, 2023. As stated therein, social and economic issues (including those caused by capitalism) and speculation (including gentrification) are not significant environmental issues pursuant to CEQA, and the Draft EIR adequately specifies the affordable housing components of the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nevertheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 11-5

The community is concerned with the gentrification and subsequent displacement the Project would cause, if approved, especially with multiple high-rise mixed-use projects planned for the area, at least one of which the CPC already approved without many of us knowing. The scale of gentrification that is happening in this area is much bigger than before, with all the new massive-scale developments and tower projects planned in the Arts District at designated “Hybrid Industrial” zoning lots following the City-approved DTLA 2040 Community Plan. The City is complicit in playing the role of promoting “revitalization” of the area while it actually brings a massive displacement of the existing established historical community. If this project is approved, it will make it easier for other developers to come in and build high-rises, in other words, continue the precedent of allowing out-of-state developers to swoop in and make enormous, overwhelming changes to our neighborhoods. Continuum Partners’ proposed Cold Storage development project at 4th and Central threatens to fundamentally change Little Tokyo and adjacent neighborhoods such as Skid Row and the Fashion District. The project aims to “revitalize the Project Site and the surrounding neighborhood” (pp. II-11), in other words, allow a developer from Colorado to construct high-rise luxury housing and “creative office space,” bring in expensive restaurants, and create heavily surveilled “public” open space off-limits to poor folks. Little Tokyo is already struggling against gentrification; the Cold Storage project would hasten it and make Little Tokyo unrecognizable. In the last few years, several of our legacy businesses have been forced out due to rent increases by greedy landlords, and many more struggle to stay afloat. Developers, landlords, and other wealthy capitalists are literally stealing Little Tokyo from right beneath our feet, guided only by their greed for money and capital.

Response to Comment No. ORG 11-5

This comment reiterates the indirect displacement concerns expressed in Comment Nos. ORG 1B-10 and ORG 1B-11. Refer to Response to Comment Nos. ORG 1B-10, ORG 1B-11 and ORG 11-4 included in the Little Tokyo Service Center letter dated December 12, 2023.

Comment No. ORG 11-6

We demand that the Department of City Planning and the City Planning Commission put the needs of the people over profit and vote to not approve the Project.

Response to Comment No. ORG 11-6

The commenter requests the City Planning Commission not to approve the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. ORG 12

Los Angeles Poverty Department
Henriette Brouwers, Associate Director
Received December 11, 2023

Comment No. ORG 12-1

My name is Henriette Brouwers and the associate director of Los Angeles Poverty Department. LA Poverty Department is a non-profit arts organization, founded in 1985. It is the first performance group in the nation made up principally of homeless people, and the first arts program of any kind for homeless people in Los Angeles. One of our projects is the Skid Row History Museum & Archive on 250 s. Broadway, which operates as an archive, exhibition, performance, and meeting space curated by LAPD. It foregrounds the distinctive artistic and historical consciousness of Skid Row and functions as a means for exploring the mechanics of displacement in an age of immense income inequality, by mining a neighborhood's activist history and amplifying effective community strategies.

I also am a leader with the Skid Row Now and 2040 Coalition. Over the past six years, we've built a very productive and mutually respectful relationship with the DTLA 2040 team at DCP.

I am writing concerning the 4th and Central Project located south of and adjacent to Skid Row and Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

Response to Comment No. ORG 12-1

This comment provides background information on the Los Angeles Poverty Department and introduces comments on the Project. Specific comments are addressed in Response to Comment Nos. ORG 12-2 through ORG 12-6 below.

Comment No. ORG 12-2

I am extremely concerned about the size and heights of these buildings, which are completely out of scale with development in Skid Row and Little Tokyo and the existing, surrounding low-rise development. The buildings will change the character of our neighborhood and overshadow our cultural and historic resources.

Response to Comment No. ORG 12-2

This comment expresses a concern that the Project is incompatible in size and height with existing, low-rise development in Skid Row and the Little Tokyo neighborhoods. Refer to Response to Comment Nos. ORG 2B-4 to ORG 2B-7 in the LTCC comment letter dated December 8, 2023, which address the Project's compatibility with the Little

Tokyo historic neighborhood. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Nonetheless, while the Project would not result in significant aesthetics or off-site indirect impacts to the Little Tokyo historic neighborhood or Skid Row, the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR. These modifications are shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories, while increasing the height of Building 6 (on the South Site) from six stories to 26 stories. The Project's overall floor area (2,318,534 square feet) would remain the same as analyzed in the Draft EIR. Relevant figures from the Draft EIR have also been revised to illustrate the Project design modifications.

Comment No. ORG 12-3

I understand that there will be construction impacts from the DEIR, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshipping in, and visiting Skid Row and Little Tokyo.

Response to Comment No. ORG 12-3

This comment acknowledges that there will be construction impacts from the Project, including noise, traffic, and air quality issues. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. ORG 12-4

I have significant concerns about the 4th & Central project generally as well as the following unmitigated impacts which are sufficiently NOT addressed in the draft Environmental Impact Report.

I am concerned about:

- Nearby stakeholders have not had adequate time to review the draft EIR
- Construction Impacts on the neighborhoods
- Undeniable impact on the adjacent historic cultural neighborhoods of Skid Row and Little Tokyo
- Lack of affordable housing for a range of low-income levels
- The overwhelming height of the 40+ story tower

- Pedestrian and bike safety
- Connection and consistency of this project with the local communities
- Impact on nearby small businesses
- Impact on adjacent residents

Response to Comment No. ORG 12-4

This comment lists variety of concerns, which are similarly listed in Comment Nos. ORG 1B-4 to ORG 1B-11. Refer to Response to Comment Nos. ORG 1B-4 to ORG 1B-11 included in the Little Tokyo Service Center letter dated December 12, 2023. This comment also expresses indirect business displacement concerns. Refer to Response to Comment No. ORG 1B-10, which addresses impacts to small businesses. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. ORG 12-5

In addition to the above, I seek a neighbor engagement process learning from what we have with the DTLA 2040 community plan process together. I am not aware of any community engagement towards Skid Row regarding this project. Past media doesn't acknowledge Skid Row, instead referring to the neighborhood below Little Tokyo as Arts District Adjacent. In terms of equity and historic injustice, the lack of engagement with Skid Row around this project is very disturbing. ***I urge the Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package***.

Response to Comment No. ORG 12-5

This comment requests the City's Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package. Refer to Response to Comment No. 1B-12 included in the Little Tokyo Service Center letter dated December 12, 2023, which address this comment. Also, of note, both in advance of and during the entitlement process, the Applicant met with a broad array of stakeholders within the Downtown Los Angeles community, including but not limited to residents, Neighborhood Councils/members, Business Improvement Districts (BIDs), non-profit service providers, shelters, housing providers, resident associations, community groups, schools, small businesses, artists, museums, art groups, and labor groups. The outreach has taken the following forms:

- Community presentations;
- Small group meetings – over 150 individual and small group meetings held;

- Surveys – nearly 200 survey responses identifying community needs and focuses;
- Local business canvassing – throughout Skid Row, Arts District, and Little Tokyo;
- Community event participation; and
- Interactive project website – to receive input and constantly updated with existing project information.

As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. ORG 12-6

Furthermore, I am in support of similar advocacy letters by Skid Row Now and 2040 and Little Tokyo Community Council due to be submitted to you.

Response to Comment No. ORG 12-6

This comment expresses support for letters provided by Skid Row Now and 2040 Coalition and LTCC. These letters and responses to the comments provided therein are provided as Comment Letters ORG 3 and 2B, respectively. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment Letter No. ORG 13

Japanese American Cultural and Community Center
Stephanie Romero, Executive Assistant to the CEO
244 S. San Pedro St.
Los Angeles, CA 90012
Received December 11, 2023

Comment No. ORG 13-1

Please find attached the comment letter from Patricia Wyatt, President and CEO of JACCC.

Response to Comment No. ORG 13-1

The comment introduces the letter from the Japanese American Cultural and Community Center, which is addressed in Response to Comment Nos. ORG 13-2 to ORG 13-4 below.

Comment No. ORG 13-2

I am submitting this comment letter on behalf of the Japanese American Cultural and Community Center (JACCC).

We have a vested interest in - and history of - fighting for justice for the broader Nikkei community as well as the local community of Little Tokyo. With regards to the proposed 4th and Central Project, we stand with organizations such as the Little Tokyo Community Council, Nikkei Progressives, and Little Tokyo Service Center - and call for the Planning Department to require the developer of this project to further demonstrate that they are mitigating the negative effects of this project and working with the communities of Little Tokyo and Skid Row to ensure that this is a project which will benefit both of these historic cultural communities of color.

Response to Comment No. ORG 13-2

This comment introduces JACCC. The comment's 2nd paragraph regarding environmental effects to communities of color is identical to the 2nd paragraph in Comment No. ORG 8-2. Refer to Response to Comment No. ORG 8-2 in the Nikkei for Civil Rights and Redress comment letter dated December 11, 2023, which addresses this comment. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 13-3

Relative to environmental impacts of the project, we find that the Draft EIR as submitted does NOT meet the standards articulated in the CA Environmental Quality Act (CEQA) guidelines for disclosure of a project's significant environmental effects.

We are supportive of and reiterate the concerns raised in the Little Tokyo Community Council's letter – submitted to you via email:

- Nearby stakeholders have not had adequate time to review the draft EIR
- The draft EIR does not adequately address the projects impact on cultural & historic resources – and egregiously does not recognize Little Tokyo as an adjacent cultural & historical district
- The draft EIR incorrectly analyzes its impact on traffic in the area
- The project as proposed inadequately addresses issues of pedestrian and bicycle connectivity with adjacent communities
- The draft EIR does not adequately address construction impacts of the project
- The project as proposed does not provide adequate detail about publicly accessible open spaces – specifically types of amenities that will be provided for community members who do not live on-site, especially those who are unhoused
- The draft EIR and project description do not provide any analysis of the shadow which the 40+ story tower will cast on the adjacent neighborhoods of Skid Row and Little Tokyo
- The draft EIR does not adequately address displacement concerns - particularly the indirect displacement of residents in the adjacent neighborhood and businesses in the adjacent neighborhood

In addition to the above comments - which were documented in more detail in the aforementioned letter from the Little Tokyo Community Council, JACCC ***urges the Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package***.

Response to Comment No. ORG 13-3

This comment is identical to Comment No. ORG 8-3. This comment makes reference to issues raised in the comment letter provided by LTCC. Responses to LTCC's December 8, 2023 are provided in Response to Comment Nos. ORG 2B-2 to ORG 2B-42. It is also acknowledged that these comments are identical to a portion of Comment No. ORG 1B-4 and Comment Nos. ORG 1B-5 through ORG 1B-10. Thus, refer to Response to

Comment Nos. ORG 1B-4 to ORG 1B-10 in the Little Tokyo Service Center letter dated December 12, 2023.

This comment also requests the City's Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package. This portion of the comment is identical to the last sentence of Comment No. ORG 1B-12. Refer to Response to Comment No. 1B-12 in the Little Tokyo Service Center comment letter dated December 11, 2023, which addresses this comment. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

This comment makes reference to issues raised in the comment letter provided by LTCC. Responses to LTCC's comment letter dated December 8, 2023 are provided in Response to Comment Nos. ORG 2B-2 to ORG 2B-42.

This comment also requests the City's Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package. Refer to Response to Comment No. 1B-12 included in the Little Tokyo Service Center letter dated December 12, 2023, which addresses this comment. The comment does not provide substantial evidence that the Project will cause significant impacts not disclosed in the Draft EIR as required by CEQA or that the Draft EIR is otherwise deficient under CEQA. As such, no further response is necessary.

Comment No. ORG 13-4

This project is completely out of context with the surrounding communities of Little Tokyo and Skid Row – both in terms of its massive scale as well as its character. The proposed project will endanger the adjacent neighborhoods and overshadow the nearby area: putting residents, businesses, non-profits, other organizations and religious institutions at risk of displacement.

Given the disproportionately negative impact which the project will have on two historic communities of color – both of which have borne the brunt of decades of systemic racism in City Planning, if the Planning Department is to follow its stated goal of racial equity, it must follow the lead of those who are most affected by this project and ensure that the developer is responsive to these clearly articulated community concerns.

Thank you for your consideration of these comments. I look forward to reviewing the revisions to the Draft EIR.

Response to Comment No. ORG 13-4

This comment is identical to those provided in Comment Nos. ORG 1B-13 and ORG 1B-14. Refer to Response to Comment Nos. ORG 1B-13 and ORG 1B-14 included in the Little Tokyo Service Center letter dated December 12, 2023.

Comment Letter No. ORG 14

United Coalition East Prevention Project
Charles Porter, Project Coordinator
Received December 11, 2023

Comment No. ORG 14-1

Please see the attached public comment recently submitted to Tamar Gharibian.

Response to Comment No. ORG 14-1

The comment introduces the letter from the United Coalition East Prevention Project, which is addressed in Response to Comment Nos. ORG 14-2 to ORG 14-5 below. Comment No. ORG 14-2

My name is Charles Porter and I work for United Coalition East Prevention Project, a program of Social Model Recovery Systems, located in the Skid Row neighborhood. I am submitting this public comment to express our concerns and demand immediate action for the implementation of protective measures for the Skid Row community in light of the proposed development project within its boundaries. Skid Row is defined by 3rd Street to the north, Alameda to the east, 7th Street to the south, and Main Street to the west.

As advocates for the community, we are committed to ensuring responsible land use that prioritizes public health. Our efforts, in collaboration with the Skid Row Now and 2040 Coalition, have focused on promoting diversity and equity in land use as part of the pending Downtown Los Angeles Community Plan (DTLA2040). We have significant concerns regarding the 4th and Central Project and its potential impact on Skid Row community. This extensive development project, spanning over 7.5 acres, is set to include multiple buildings of varying heights, with the tallest soaring to forty-four stories. It is absolutely critical and non-negotiable that any development in Skid Row is executed with a deep and thorough consideration for its profound impact on the existing community and environment.

Response to Comment No. ORG 14-2

This comment provides background information on United Coalition East Prevention Project and the Skid Row community. The comment states that any development, such as the Project, in Skid Row should be executed with a deep and thorough consideration for its profound impact on the existing community and environment. The City has prepared a Draft EIR and this Final EIR in accordance with the requirements of CEQA, which adequately analyzes and discloses the Project impacts on the environment. Also, the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR. These modifications are shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on

the North Site) from 44 stories to 30 stories, while increasing the height of Building 6 (on the South Site) from six stories to 26 stories. The Project's overall floor area (2,318,534 square feet) would remain the same as analyzed in the Draft EIR. Relevant figures from the Draft EIR have also been revised to illustrate the Project design modifications.

As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment No. ORG 14-3

Since 1999, I have been a part of the Skid Row community, witnessing firsthand how residents bravely confronted and curbed nuisance businesses, particularly alcohol outlets, that threaten our community's health and safety. I have also witnessed resident-led initiatives for self-representation and agency to shape a Skid Row that addresses our long-ignored neighborhood needs. The proposed project threatens to fundamentally alter the character of our neighborhood, potentially introducing additional alcohol uses to an area already inundated with such establishments.

The dense concentration of alcohol uses in and around Skid Row is not just a public health threat but also a glaring example of inequitable distribution of land use. In the three core Skid Row census tracts (2063.01, 2063.02, 2063.03) and five adjacent tracts containing portions of Skid Row (2260.02, 2062.01, 2073.06, 2073.07, 2073.08), the California Department of Alcoholic Beverage Control (ABC) permits a total of 21 alcohol licenses (15 on-sale, 6 off-sale) per tract. Yet as of December 11, 2023, there exists a staggering 124 active alcohol uses {105 on-sale, 19 off-sale) in these areas, far exceeding the authorized limits. This overwhelming presence underscores the urgency for land use policies that are attuned to the needs of the Skid Row community. The proposed DTLA 2040 plan has made a start by prohibiting new off-sale alcohol establishments in the lx1 zone, but this is not enough. We strongly urge you to extend these restrictions to all new alcohol uses, including on-sale establishments in the Skid Row neighborhood, particularly those affiliated with the with the LA City Restaurant Beverage Program. This action is essential to safeguard the health and well-being of our community.

Response to Comment No. ORG 14-3

This comment relates to the Project's entitlement request for a Master Conditional Use Permit to permit the sale and dispensing of alcoholic beverages for on-site and/or off-site consumption, which is beyond the purview of CEQA. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nevertheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Of note, the requested Master Conditional Use Permit would require each individual establishment within the Project to obtain a Master Plan Approval (MPA) determination for on-site alcohol sales in conjunction with the operation of Project's commercial uses, in order to implement and utilize the Master Conditional Use Permit. The MPA process would allow the City to review each establishment in greater detail and to tailor site-specific conditions of approval for each of the premises subject to analysis of the venue's individual mode and character of operations, including, but not limited to, hours of operation, seating capacity, size, security, live entertainment, the length of a term grant and/or any requirement for a subsequent MPA application to evaluate compliance and effectiveness of the conditions of approval. In addition, the Project's commercial uses with alcohol service would require a license from the California Department of Alcoholic Beverage Control and would operate in conjunction with all applicable laws to ensure the safety of patrons, employees, and nearby residents, as well as harmony with the character of the surrounding area.

Comment No. ORG 14-4

Furthermore, I am deeply troubled by the extensive detrimental effects of the proposed project on both Skid Row and the neighboring little Tokyo community. This project threatens to unleash a host of environmental hazards, including excessive noise, disruptive traffic, and degraded air quality, adversely affecting all surrounding stakeholders. Particularly concerning is the increased danger to pedestrians and cyclists, especially given the high incidence of vehicle-related deaths among people experiencing homelessness. The project's construction phase poses a significant risk of exacerbating these dangers, demanding immediate and stringent mitigation measures to protect the vulnerable members of our communities.

Response to Comment No. ORG 14-4

This comment expresses general concerns related to noise, traffic, air quality, and pedestrian safety. The Draft EIR fully evaluated noise impacts in Section IV.G, *Noise*, air quality impacts in Section IV.A, *Air Quality*, and transportation-related impacts in Section IV.J, *Transportation*, of the Draft EIR, respectively. The Project would result in short-term significant and unavoidable impacts related to construction-related air quality emissions, on-site construction noise, off-site traffic noise, and groundborne vibration (structural damage). These significant and unavoidable impacts are also summarized in the Draft EIR's Executive Summary.

Also, the Project would implement a Construction Management Plan, included as Project Design Feature TRAF-PDF-1 in the Draft EIR. The Construction Management Plan will formalize how construction activities will be carried out and identify specific actions that will be required to reduce effects on the surrounding community, including how construction vehicles would safely access the Project Site. This would effectively ensure that the surrounding community, including the homeless population, would be safe from construction vehicles. The Construction Management Plan will be based on the nature

and timing of the specific construction activities and other projects in the vicinity of the Project Site.

As this comment does not raise any specific issues on the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. ORG 14-5

My concerns are multifaceted and urgent:

1. Stakeholders have been given insufficient time to review the draft Environmental Impact Report (EIR), compromising the thoroughness of community feedback.

2. The construction phase of the project threatens to disrupt life in the neighborhoods substantially.

3. The project will inevitably impact the historic and culturally rich neighborhoods of Skid Row and little Tokyo.

4. There is a conspicuous absence of affordable housing solutions for a broad range of low-income individuals.

5. The towering height of the proposed 40+ story building is disproportionate and overbearing.

6. Pedestrian and cyclist safety near the construction site is jeopardized.

7. The project does not align with, and may even contradict, the needs and essence of the local communities.

8. Nearby small businesses face potential adverse effects.

9. Residents living close to the project site will likely experience negative impacts.

In addition, I am calling for a community engagement process that mirrors the inclusive approach of the DTLA 2040 community plan. There is a noticeable lack of meaningful engagement with the Skid Row community regarding this project. Historical accounts often neglect to acknowledge Skid Row, inaccurately referring to the area as 'Arts District Adjacent'. This misrepresentation is more than a mere labeling issue; it reflects a systemic disregard for equity and historical injustice. The failure to involve the Skid Row community in the planning and development of this project is deeply concerning and requires urgent and comprehensive action to address these disparities.

Response to Comment No. ORG 14-5

This comment lists variety of concerns which are similarly listed in Comment Nos. ORG 1B-4 to ORG 1B-11. Refer to Response to Comment Nos. ORG 1B-4 to ORG 1B-11 included in the Little Tokyo Service Center letter dated December 12, 2023. This comment also expresses indirect business displacement concerns. Refer to Response to Comment No. ORG 1B-10, which addresses impacts to small businesses.

The comment also calls for involvement with the Skid Row community in the planning and development of the Project. With regard to the Draft EIR and the CEQA process, the City has complied with all applicable CEQA noticing and distribution requirements. Of note, both in advance of and during the entitlement process, the Applicant met with a broad array of stakeholders within the Downtown Los Angeles community, including but not limited to residents, Neighborhood Councils/members, BIDs, non-profit service providers, shelters, housing providers, resident associations, community groups, schools, small businesses, artists, museums, art groups, and labor groups. In the Skid Row/Industrial District area, the Applicant conducted outreach to and engaged in dialogue with the Neighborhood Council, BID, shelters, schools, small businesses, artists, community-based art groups, and residents. The outreach has taken the following forms:

- Community presentations;
- Small group meetings – over 150 individual and small group meetings held;
- Surveys – nearly 200 survey responses identifying community needs and focuses;
- Local business canvassing – throughout Skid Row, Arts District, and Little Tokyo;
- Community event participation; and
- Interactive project website – to receive input and constantly updated with existing project information.

As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 1

Mark Masaoka
3060 St. George Street
Los Angeles, 90027
Received October 24, 2023

Comment No. IND 1-1

How may I purchase the CD with the entire EIR report? I can come in person to City Hall.

Thank you.

Response to Comment No. IND 1-1

The following response was provided to the comment by Los Angeles Department of City Planning Staff on October 24, 2023:

> *Thank you for reaching out. The Department no longer prints CDs for purchase. However, you can find digital copies of the Draft EIR along with all its appendices and references at the website here: Fourth & Central Project I Los Angeles City Planning (lacity.org).*
>
> *If you prefer to review a physical copy, you can visit any of the locations below to review the Draft EIR.*
>
> - *Los Angeles Central Library, 630 West 5th Street, Los Angeles, CA 90071*
> - *North Hollywood Amelia Earhart Regional Library, 5211 Tujunga Avenue, North Hollywood, CA 91601*
> - *Studio City Branch Library, 12511 Moorpark Street, Studio City, CA 91604.*

As the comment does not address the adequacy or content of the Draft EIR, no further response is necessary.

Comment Letter No. IND 2

Hattie H. Bradshaw
72 Cactus Street
Riverside, CA 92509
Received November 7, 2023

Comment No. IND 2-1

I am writing to express my concerns regarding the Fourth & Central Project, identified as Case Number: ENV-2021-4071-EIR.

This two-billion-dollar project aims to develop a diverse array of facilities, including residential units, office spaces, restaurant/retail establishments, and hotels. It encompasses ten high-rise structures spanning a total of 2,318,534 square feet, comprising 1,521 residential units, 411,113 square feet of office spaces, and 101,088 square feet designated for restaurant/retail purposes. This project could bring significant benefits to the area, if done right.

What troubles me is the absence of any concrete measures for mitigating greenhouse gas emissions in a project of this magnitude. It seems that the Environmental Impact Report (EIR) has concluded that the project requires no mitigation, based on the premise that the project is replacing an existing cold storage facility and thus eliminating substantial emissions from that existing facility. The EIR calculates the emissions of the current facility to be approximately 20,386 metric tons per year of carbon dioxide equivalent.

However, there are reports suggesting that the emissions from the existing cold storage facility will not be eliminated but merely relocated. This move is part of an agreement reached between the developer and the property owner, Los Angeles Cold Storage, as indicated in a news article: "Continuum formed a partnership with the property owner, Los Angeles Cold Storage, to develop the site. The deal includes relocating the business" (https://therealdeal.com/la/2022/03/14/continuum-in-enviro-review-on-2b-plan-for-dtla/).

If the cold storage facility is merely being relocated rather than fully displaced, it implies that there is no genuine offset. In reality, emissions are effectively doubling due to this project, which raises concerns about the accuracy of the emissions accounting process.

I strongly believe that the approval of this project should be contingent upon the developer's commitment to ensuring that emissions are not merely shifted but are genuinely reduced or retired. Alternatively, the project should be mandated to take proactive steps in mitigating its greenhouse gas emissions.

It is crucial that we hold all developers, regardless of their origin, accountable in our pursuit of California's substantial emission reduction targets. Granting exemptions to affluent out-of-state developers undermines our collective efforts to combat climate change.

Response to Comment No. IND 2-1

This comment raises concerns regarding GHG impacts of the Project, with an inquiry as to whether the existing cold storage facility will be relocated elsewhere. With implementation of the Project, the existing cold storage facilities would be removed from the Project Site. As discussed above in Response No. ORG 4-2, there is substantial evidence in the record that the current operations will cease and will not be continued elsewhere. The commenter's assumptions are therefore, speculative. Thus, there is no potential for the Draft EIR to misrepresent the Project's air quality and GHG impacts as evaluated in the Draft EIR, nor is there any "piecemealing" of impacts related to the Project. Because there is no evidence that the current site operations would be replaced or relocated, any analysis of potential replacement project impacts would be speculative, which is not required by CEQA pursuant to CEQA Guidelines Section 15145. Furthermore, the Draft EIR's evaluation of GHG impacts is based on the questions set forth in Appendix G of the CEQA Guidelines, as utilized by the City of Los Angeles in their CEQA documents. As evaluated in Section IV.E, *Greenhouse Gas Emissions*, with supporting documentation provided in Appendix B, Air Quality/Greenhouse Gas Emissions Technical Documentation, of the Draft EIR, GHG impacts would be less than significant. Also, the Draft EIR addressed air quality impacts in Section IV.A, *Air Quality*, with supporting data provided in Appendix B of the Draft EIR. As analyzed therein, as the warehouse use would be discontinued and not replaced or relocated, the emissions from the operation of the warehouse would also cease and were discounted from the total emissions in determining the net operational emissions for the Project. T he Project would result in less-than-significant long-term operational impacts based on the removal of the existing uses on-site and the operation of the residential and commercial mixed-use project.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR. In addition, refer to Appendix C of this Final EIR for air quality and GHG emissions technical data associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Comment Letter No. IND 3

David Ranusch
618 E. 4th St., #8
Los Angeles, CA 90013
Received November 5, 2023

Comment No. IND 3-1

Enclosed is a copy of the EIR notice you sent last month. Also, a copy of my letter to Mr. Como from March, 2022. I still wish to track the status of the proposed project as I'm worried about the spillover effects noted in the letter to Como. Reading the top paragraph of page 2 on the notice, I'm not quite sure where it all stands or what's been resolved. Particularly that last sentence: "ALL OTHER POTENTIAL IMPACTS WOULD BE LESS THAN SIGNIFICANT OR MITIGATED TO LESS THAN SIGNIFICANT LEVELS." Living just across the street I'm sure you get my concern. Since I'm at my job in the 9 to 4 time I can't make appointments but I hope you'll write or phone to keep me informed when you have the time.

Thank you very much for your time and help,

Response to Comment No. IND 3-1

This comment references a comment letter sent by the same commenter dated March 19, 2022. The comments in the March 19, 2022 letter are addressed below.

Comment No. IND 3-2

I write to respond to the March 10 Preparation Notice you sent regarding a proposed demolition/construction project across the street from where I live. Since I can't attend the scoping meeting it's best to send comments by letter. The notice I got mentioned "significant environmental impacts" which I found alarming. Whatever impacts that may spell trouble at first evaluation should at least be doubled by things either unforeseen or thought trivial at first. For instance there may be an asbestos factor or something else even more harmful that could get in the air and pay us a visit. I also know for a fact that police protection around here is severely lacking.

All those items listed at the middle of page three of the notice must be taken into account as potentially major threats to our health and well-being as well as to the city if it lacks the infrastructure to keep this growth from turning cancerous. It's a fear of mine that business growth and revenue increase should take priority over what's best for the people of L.A. and speaking for myself I am afraid of being a little too close to the path of progress and maybe getting run over by that bulldozer or at least getting pushed out by it. It's worth repeating that all possible dangers be considered and then doubled rather than discounted before the green light is given to the plan.

I hope your department will keep me posted as to developments and I thank you for your time.

Response to Comment No. IND 3-2

The purpose of the Notice of Preparation (NOP) was to inform the public that an EIR will be prepared for the Project. The EIR prepared for the Project adequately addressed the environmental issues listed in the NOP with substantiation as to why impacts were found to be less than significant, mitigated to a less-than-significant level, or significant and unavoidable without or with mitigation.

This comment expresses general concerns regarding asbestos/hazardous emissions, air quality impacts, impacts regarding police protection services, and adequacy of infrastructure. With regard to hazardous materials, including asbestos, such impacts were determined to be less than significant as evaluated in the Project's Initial Study, which is included in Appendix A of the Draft EIR.

The Draft EIR addressed air quality impacts in Section IV.A, *Air Quality*, with supporting data provided in Appendix B, Air Quality/Greenhouse Gas Emissions Technical Documentation, of the Draft EIR. As analyzed therein, the Project would result in short-term significant and unavoidable impacts related to construction-related air quality emissions. These significant and unavoidable impacts are also summarized in the Draft EIR's Executive Summary. In addition, a health risk assessment was prepared for the Project with design modifications, which is included as Appendix B, Health Risk Assessment, of this Final EIR. As discussed in Response to Comment Nos. AG 4B-3 to AG 4B-5, the Project would not result in health risks above acceptable regulatory South Coast Air Quality Management District (SCAQMD) thresholds.

In addition, refer to Appendix C, of this Final EIR, for air quality and GHG emissions technical data associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

As concluded in Section VI, *Other CEQA Considerations*, of the Draft EIR, the Project is being proposed, notwithstanding the Project's short-term significant and unavoidable construction-related air quality impacts because (1) the Project would support a considerable number of regional and community land use and mobility objectives, including those that promote mixed-use, infill development within a Transit Priority Area (TPA); (2) the Project would provide needed housing to serve the local area and the region; and (3) the Project would provide economic benefits to the Central City community. In addition, as a result of the conclusions of the analyses contained within the Draft EIR, a statement of overriding considerations supported by substantial evidence will be prepared and reviewed by the decision-maker in accordance with the CEQA Guidelines Section 15093 when making a determination on the Project.

Regarding police protection, police services impacts were addressed in Section IV.I.2, *Public Services - Police Protection*, of the Draft EIR, with supporting data provided in Appendix I-2 of the Draft EIR. Pursuant to the CEQA Guidelines and the thresholds used by the City to determine the significance of impacts to police services, the focus of the analyses is on whether or not new or expanded facilities are needed to maintain adequate public service and whether a potential physical impact could occur if construction of facilities was warranted. In the case of the Project, it was determined that the Project would not generate a demand for additional police protection services that would result in the need for new or expanded fire and police services facilities. As such, Section IV.I.2, *Public Services – Police Protection*, of the Draft EIR, concluded that impacts to police services would be less than significant. Notably, regarding public safety, as provided in Project Design Feature POL-PDF-2, the Project would incorporate a security program to ensure the safety of its residents, employees, and visitors of the Project Site. The Project's security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services. Implementation of Project Design Feature POL-PDF-2 would help to offset the Project's operational demand for police protection services from LAPD. Furthermore, the addition of the Project would provide more "eyes and ears" on the ground from on-site residents, visitors, and employees, making the area safer for residents and pedestrians in the Project vicinity.

Regarding the adequacy of existing infrastructure, the Draft EIR addressed infrastructure impacts in Sections IV.L.1, *Utilities and Service System – Water Supply*, IV.L.2, *Utilities and Service System – Wastewater*, IV.L.3, *Utilities and Service System – Solid Waste, and* IV.L.2, *Utilities and Service System – Energy and Natural Gas* with supporting data provided in Appendix L, Utility Information, of the Draft EIR. As analyzed therein, water and wastewater infrastructure impacts would be less than significant after mitigation, where applicable. Solid waste and energy infrastructure impacts would also be less than significant without the need for mitigation. Also, the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR. These modifications are shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR. See Appendix G, Modified Project Utility Information of this Final EIR, which includes applicable supporting data for the Project with design modifications.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 4A

Jeff Liu
Received November 9, 2023 and November 14, 2023

Comment No. IND 4A-1

I am a board member of the Little Tokyo Community Council and I am writing in regards to the 4th and Central development project, case #ENV-2021-4071-EIR.

I have some questions about the project DEIR that I hope you can answer:

1. Was there a shade study conducted for the project? If so, where can I find it?

Response to Comment No. IND 4A-1

The commenter's involvement in LTCC and identification as a stakeholder in Little Tokyo is acknowledged by the City.

The Project's CEQA documentation does not include a shade study as shading is not considered a CEQA impact. Furthermore, as discussed in the Project's Initial Study, which is included in Appendix A of the Draft EIR, Senate Bill (SB) 743 (Public Resources Code [PRC] Section 21099[d]) sets forth guidelines for evaluating project aesthetic impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." Furthermore, the related City of Los Angeles Department of City Planning Zoning Information (ZI) No. 2452 provides further guidance concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA." PRC Section 21099 and ZI No. 2452 apply to the Project. Therefore, the Project is exempt from significant aesthetic impact findings, including those related to shade and shadow.

As this comment does not raise any issues with respect to the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. IND 4A-2

2. Does the DEIR include a current study of existing vehicular traffic (number of vehicles, average speeds during the day) on streets surrounding the project.

Response to Comment No. IND 4A-2

The Project conducted a Transportation Assessment (TA) that evaluated transportation impacts required by CEQA, as well as a non-CEQA component for consistency with Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines

(TAG). The TA is included in Appendix J of the Draft EIR. In addition, as shown in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, design modifications made to the Project in response to public and agency comments received on the Draft EIR have been addressed within a modified Project VMT analysis, included in Appendix F of this Final EIR.

Pursuant to SB 743, the California Natural Resources Agency adopted the Office of Planning and Research's (OPR) recommended vehicle miles traveled (VMT) guidelines on December 28, 2018. The guidelines resulted in changes to Section 15064.3 and Appendix G of the CEQA Guidelines that effectively removed automobile delay and associated level of service (LOS) as the metric to evaluate transportation impacts pursuant to CEQA, and replaced it with VMT. Accordingly, pursuant to these changes, the City adopted VMT as a CEQA threshold to determine transportation impacts. Therefore, the analysis of transportation impacts in Section IV.J, *Transportation*, of the Draft EIR, was focused on VMT and other analyses required by Appendix G of the CEQA Guidelines. Transportation issues not required to be analyzed under CEQA were presented in Chapter 5 of the TA (Appendix J of the Draft EIR).

Based on SB 743 and the City's TAG, LOS, congestion, delay, and parking effects are no longer considered impacts on the environment, and, therefore, such effects were not evaluated as CEQA impacts in the Draft EIR. As such, refer to Chapter 5 of the TA for a discussion of these non-CEQA issues. With regard to vehicle speeds, average speeds were discussed in the analyses, where relevant and appropriate.

The City, through the LADOT TAG, continues to require that transportation assessments analyze various non-CEQA transportation topics, such as pedestrian, bicycle, and transit access; intersection operations; project access; construction period traffic effects; and residential street cut-through effects. The City's TAG also establishes various criteria for these analyses where corrective actions may be appropriate to address non-CEQA adverse effects. These issues were discussed in the non-CEQA portion (Chapter 5) of the TA prepared for the Project. The results of these analyses of non-CEQA topics and the proposed corrective actions identified in the TA will be addressed through potential Project conditions of approval.

As this comment does not raise any issues with respect to the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. IND 4A-3

3. Given that Alameda St. is a City of Los Angeles-recognized truck route from the 10 Freeway to the 101 Freeway, is there a current study included of commercial truck traffic (number of vehicles, average speeds during the day) on Alameda St. and other streets surrounding the project? Was truck traffic factored into the DEIR? If so, where can I find this information?

Response to Comment No. IND 4A-3

This comment asks whether truck traffic was factored into the Draft EIR. As discussed above, the Project's TA analysis of non-CEQA impacts in Chapter 5 of the TA analyzed issues related to intersection operations, project access, and construction period traffic effects. Existing traffic conditions counts included truck traffic along Alameda Street. However, the counts did not distinguish vehicle types for purposes of intersection operations. Refer also to Response to Comment No. ORG 2B-13, which addresses safety considerations along Alameda Street due to truck traffic. The commenter does not otherwise identify any specific CEQA issues related to truck traffic. Regardless, the Draft EIR's transportation analysis included in Section IV.J, *Transportation*, of the Draft EIR, fully analyzed the Project's transportation impacts as required by CEQA and the City's TAG and determined impacts to be less than significant.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications. Applicable updates to the CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications will not result in any significant new or substantially increased impacts.

Comment No. IND 4A-4

3. Does the DEIR include estimated vehicular traffic impacts to the surrounding streets once the project is fully in operation? Where can I find this information?

Response to Comment No. IND 4A-4

This comment asks if the Draft EIR evaluated vehicular traffic impacts to the surrounding streets once the Project is fully in operation. An analysis of the Project's impacts to the surrounding streets was included in Chapter 5 of the TA. Refer to Response to Comment No. IND 4A-2 for additional information on the Project's non-CEQA analysis included in the Project's TA, included in Appendix J of the Draft EIR.

Comment No. IND 4A-5

4. Does the DEIR include information on where the bicycle parking will be located within the project and what type of bicycle parking (lockers, exposed racks, etc.) will be included? If so, where can I find this information?

Response to Comment No. IND 4A-5

This comment asks about the location bicycle parking and the types of bicycle facilities provided. As discussed in Chapter II, *Project Description*, of the Draft EIR, and updated in Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, the Project would include 163 short-term bicycle parking spaces and 629 long-term bicycle

parking spaces for a total of 792 bicycle spaces. The Project's bicycle parking spaces and facilities would be provided at various locations throughout the Project Site, as shown in Figure II-7, *Ground Level Plan*, in Section II, *Project Description*, of the Draft EIR, and would include lockers, fix-it/repair stations, and showers. An updated Figure II-7 reflecting the Project with design modifications is provided in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR.

Comment No. IND 4A-6

5. Does the DEIR include a bicycle study of the project area and current bike trips? Does the DEIR include information on estimated number of bicycle trips once the project is fully in operation? If so, where can I find this information?

Response to Comment No. IND 4A-6

This comment asks about the availability of a bicycle study. A bicycle study, discussing the estimated number of bicycle trips, was not provided as part this EIR or required for purposes of analyzing the Project's impacts under CEQA. However, the Project's inclusion of bicycle facilities, which is required to meet LAMC requirements, is relevant to analyzing the Project's consistency with applicable transportation plans and policies and VMT impacts. These facilities were considered as part of the TA's assessment of CEQA impacts, and were incorporated into Section IV.J, *Transportation*, of the Draft EIR.

Comment No. IND 4A-7

6. Does the DEIR describe how the project will handle stormwater runoff and management? If so, where can I find this information?

Response to Comment No. IND 4A-7

This comment asks about stormwater runoff and management, which were evaluated in the Project's Initial Study, included in Appendix A of the Draft EIR. Specifically, see the discussion of Hydrology and Water Quality impacts on pages 87 to 97 of the Initial Study. As analyzed therein, the Project would decrease the 50-year flow volume from the entire Project Site, and the Project would improve current conditions by capturing and treating the 85th percentile storm, thus decreasing the volume of the stormwater discharged to the public infrastructure. In addition, the Project Site does not currently have best management practices (BMPs) for the management of water runoff, while the Project would implement both construction and operation BMPs, which would reduce stormwater runoff and decrease the amount of stormwater runoff discharging into the existing storm drain system. Furthermore, the Project would comply with the City's Low Impact Development (LID) Ordinance, which would require implementation of capture and use system to temporarily store the captured stormwater until the stored volume is entirely used through irrigation on the Project Site. Therefore, the Initial Study determined that the Project would not violate any water quality standards or waste discharge requirements or, otherwise, substantially degrade surface or groundwater quality, and impacts related

to stormwater runoff, including water quality, drainage, and flooding, would be less than significant. Because impacts were appropriately addressed in the Initial Study, with no potential for significant environmental impacts, hydrology and water quality impacts need not be further analyzed as part of the Draft EIR's environmental impacts included in Section IV, *Environmental Impact Analysis*.

Comment No. IND 4A-8

7. Will the project generate its own electricity, or will it incorporate renewable energies such as solar panels? If so, where can I find this information in the DEIR?

Response to Comment No. IND 4A-8

This comment asks about the Project's use of solar panels and renewable energies. As portions of the buildings' rooftops would serve as amenity spaces or landscaped areas, some rooftop or shade structure areas would potentially support solar panels. The Project would include solar panels consistent with applicable requirements of the City, with the location and extent of such panels determined through the plan check and building permit process for each building

Comment No. IND 4A-9

8. Does the DEIR discuss the project's thawing of the historical building on the corner of Central Ave. and Fourth St., and any potential harmful or toxic gases/substances that may be released into the surrounding area? Is there mitigation for this? If so, where can I find this information in the DEIR?

Response to Comment No. IND 4A-9

This comment asks about the Project's thawing of the Los Angeles Cold Storage Building and potential release of harmful or toxic gases/substances in doing so. The thawing of the LACS Building is discussed in Section IV.B, *Cultural Resources*, of the Draft EIR. As shown on page IV.B-44, Mitigation Measure CUL-MM-3 requires preparation of a Thawing Plan for the LACS Building. No known harmful or toxic gases/substances are expected to occur with the thawing of the building. Nonetheless, the thawing of the LACS Building would be conducted under the oversight of the Los Angeles Department of Building and Safety to ensure no significant hazards occur to the public or the environment.

Comment No. IND 4A-10

9. Does the project include a helipad on top of any of the buildings, and/or is the project required by the City of Los Angeles to have a helipad on top of any of the project buildings?

I look forward to receiving your prompt reply.

Response to Comment No. IND 4A-10

This comment asks whether the Project would include a helipad on top of any of the buildings. As stated on page IV.I.1-11 in Section IV.I.1, *Public Services – Fire Protection*, of the Draft EIR, Section 57.4705.4 of the LAMC requires each high-rise building to have a rooftop emergency helicopter landing facility in a location approved by the Chief, unless certain life safety features, as specified in LAFD Requirement No. 10, are provided by the Project. Thus, a determination of the need for emergency helipads will occur as the Project moves through the City's design review and permitting process, should it be approved by the City. Further, the use of any potential helipads would be for emergency use only.

Comment No. IND 4A-11

My questions below are to help us prepare our organization's public comment letter. Can you help answer these questions?

Response to Comment No. IND 4A-11

The following response was provided to the comment by Los Angeles Department of City Planning Staff on November 14, 2023:

> *Unfortunately, we would not be able to provide answers to your questions until publication of the Final EIR. Due to the nature of CEQA, questions and comments regarding the contents of the Draft EIR are responded to in the Final EIR.*
>
> *Please let me know if you have any other questions.*

As the comment does not address the adequacy or content of the Draft EIR, no further response is necessary.

Comment Letter No. IND 4B

Jeff Liu
Received November 30, 2023

Comment No. IND 4B-1

Just a question about process. At what point is there a public hearing? Is it after the Final EIR is released or before?

Also, if there's a document that has the project development approval process I would like a copy of that.

Thank you,

Response to Comment No. IND 4B-1

The comment requests information about the EIR and project approval process. The following response was provided to the comment by Los Angeles Department of City Planning Staff on December 4, 2023:

> *There will be a hearing for the Project after the publication of the Final EIR. If at any point until that hearing you have any questions, you can submit them by emailing me.*
>
> *Thank you, please let me know if you have any other questions.*

As the comment does not address the adequacy or content of the Draft EIR, no further response is necessary.

Comment Letter No. IND 4C

Jeff Liu
Received December 11, 2023

Comment No. IND 4C-1

As a longtime stakeholder of Little Tokyo, I would like to submit this letter to be considered as part of the Public's review of the Draft Environmental Impact Report (EIR) for the Fourth and Central Project.

- On pages II-11, the Draft EIR incorrectly describes Little Tokyo as a *"neighborhood where numerous former warehouse structures are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses."* This description is FALSE and incorrectly characterizes Little Tokyo as a neighborhood that is experiencing adaptive re-use of its buildings. Little Tokyo is a recognized California Cultural District and a recognized National Historic District. It has existed as a vibrant community of residents, small businesses, religious institutions and community-serving organizations for 139 years. This description of Little Tokyo needs to be corrected.

Response to Comment No. IND 4C-1

The commenter's involvement in LTCC and identification as a stakeholder in Little Tokyo is acknowledged by the City.

The comment makes reference to a description in a subsection named, *Surrounding Land Uses*, in Section II, *Project Description*, of the Draft EIR. This description was carried forward from the Project's Initial Study dated March 2022, which identified projects that were contemplated for redevelopment, such as LTSC's Umeya project, located at the intersection of the Little Tokyo and Skid Row neighborhoods. Specifically, this project would convert and adaptively reuse the Umeya Rice Cake Company factory and warehouse into a transit-oriented, mixed-use development, featuring 175 affordable apartments. Nonetheless, this sentence has been clarified in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, to add inclusion of the Arts District, where warehouses and other manufacturing/industrial buildings are being converted to artists' workshops, live-work spaces, and neighborhood-serving retail and commercial uses. However, this clarification does not in any way affect or change the analysis of cultural and historic resources included in Section IV.B, *Cultural Resources*, of the Draft EIR. See Response to Comment Nos. ORG 2B-5 and ORG 2B-6, which address specific comments on the cultural resources analysis in the Draft EIR.

Comment No. IND 4C-2

- In the Draft EIR, the Project fails to consider Little Tokyo as a cultural and historic district resource, despite the Project being adjacent to the community. As a result, the

Project also fails to consider its impacts to the many historic resources that are located near the Project in Little Tokyo. I am concerned that the Project would add significant height to the skyline in an area that is low-density in character, would alter the immediate and wider surroundings such as Little Tokyo, and compromise the integrity of Setting for these cultural and historic resources.

Response to Comment No. IND 4C-2

This comment states the Draft EIR did not adequately address impacts on the Little Tokyo neighborhood. However, the Draft EIR appropriately analyzed historical resources within the Study Area, which were the only historical resources that had the potential to be significantly impacted by the Project. This issue is similarly mentioned in Comment Nos. ORG 2B-5 and ORG 2B-6. Refer to Response to Comment No. ORG 2B-5 and ORG 2B-6, which discuss impacts to the Little Tokyo Historic District. As discussed therein, the Draft EIR appropriately considered the potential for direct and indirect impacts to historical resources in the Study Area, and the analysis and conclusions in the Draft EIR are consistent with CEQA Guidelines. Despite the addition of new height and density in the area as proposed by the Project, there would be no substantial adverse change to historical resources in the Study Area such that they could no longer convey their historical significance. Therefore, there is no potential for indirect impacts to historical resources outside the Study Area, such as the Little Tokyo Historic District and its contributing buildings, which are separated from the Project Site by distance, multiple streets, and numerous intervening parcels. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 4C-3

The gigantic size and scale of the Project is such that it would visually dominate how the cultural and historic resources in Little Tokyo would convey themselves. Little Tokyo is one of the last 3 remaining Japantowns in the United States. It is an enduring symbol of how immigrant laborers forged a community for themselves despite racist Alien Land Laws and anti-miscegenation laws. Little Tokyo is also an important symbol of how the Japanese American community was able to rebuild itself after being imprisoned in U.S. internment camps during World War II. In addition, Little Tokyo is a constant reminder of how Americans of all backgrounds must uphold democratic values and Constitutional rights. The Project would overshadow the significance of Little Tokyo to Japanese Americans and American history. Therefore, the Project EIR should include an extensive shade and visual impact study on its aesthetic impacts to this cultural and historic resource and provide, as mitigation, lowering the heights on its buildings to a maximum of 14 floors.

Response to Comment No. IND 4C-3

This comment states that the size and scale of the Project would visually dominate how the cultural and historic resources in Little Tokyo would convey themselves. Refer to Response to Comment No. ORG 1B-13 , which discusses the Project's size and compatibility with the surrounding Project vicinity, and Response to Comment Nos. ORG 2B-5 and IND 4C-2 regarding Project impacts on historical resources. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories while increasing the height of Building 6 (on the South Site) from six stories to 26 stories, and to reduce the residential density/unit count in Building 2 from 449 units to 335 units, a reduction of 114 units. Additionally, the hotel component (68 rooms) in Building 6 has been removed. With the conversion of the 68 hotel rooms to residential units, as well as the transfer of 114 units from Building 2 to Building 6, the residential unit count in Building 6 has increased from 68 units to 250 units. Overall, the Project's unit count has been increased from 1,521 units to 1,589 units. Also, the amount of restaurant and retail space within Building 1 has been increased from 16,378 square feet to 61,038 square feet. As such, the Project's overall amount of restaurant/retail square footage has been increased from 101,088 square feet to 145,748 square feet.[39] Within Building 1, the 44,660 square feet of residential floor area (which was previously designated for residential amenity space) would be removed to accommodate the increase in restaurant and retail square footage. With these modifications, the Project's overall floor area (2,318,534 square feet) would remain the same as analyzed in the Draft EIR. The Project's total parking count has also been reduced from 2,475 spaces to 2,444 spaces. Within Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, relevant figures from the Draft EIR have also been revised to illustrate the Project design modifications summarized above.

[39] 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 Project's retail/restaurant uses, the environmental analyses included in Chapter 4, *Environmental Impact Analysis*, of the Draft EIR, evaluates a total of 158,225 square feet of restaurant/retail uses. It is assumed that there would be 67,595 square feet of retail uses and 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

Comment No. IND 4C-4

- I am concerned about the Project's transportation impacts and believe its Vehicle Miles Traveled (VMT) impacts are understated because they are not site specific nor context specific. The Project's inclusion of Transportation Demand Management (TDM) measures in its VMT analysis, including reduced parking supply, parking cash-out, bike share station, and 742 short-term and long-term bicycle parking spaces, is claimed to reduce VMT. However, the Project should provide its basis for why these TDM measures were chosen for this site. The streets (Central Ave., Alameda St., and 4th St.) surrounding and running between the Project are part of the City's High Injury Network (https://ladotlivablestreets.org/programs/vision-zero/maps) and present safety challenges for bicyclists and pedestrians. Alameda Street is also a recognized truck route (https://geohub.lacity.org/datasets/lahub::truck-route-weight-limit/about), which also presents safety and air quality issues. As the Project is located in an industrial area and the surrounding streets are not safe to walk and bike, my concern is that the TDM measures the Project will utilize to encourage walking and biking will be ineffective.

Response to Comment No. IND 4C-4

This comment expresses concerns that VMT impacts are understated because they are neither site-specific nor context specific. The commenter also states the Draft EIR should have provided a basis for why the TDM measures were chosen for the site. The commenter indicates that, since Alameda Street is a truck route, and the site is located in an industrial area, the TDM measures the Project will utilize to encourage walking and biking will be ineffective. The Project's inclusion of TDM measures was based on the available TDM strategies for the Project and the Project Site in the City's VMT Calculator. The commenter is referred to Response to Comment Nos. ORG 2B-12, which discusses the basis for the Project's TDM measures. The commenter is also referred to Response to Comment No. ORG 2B-13, which discusses the Project's TDM in consideration of the surrounding street system, including Alameda Street as a truck route. For additional information on the Project's TDM measures and their adequacy for the Project, refer to Response to Comment Nos. ORG 2B-14 and ORG 2B-15.

Comment No. IND 4C-5

Additionally, the Project would fail to connect tenants and residents to high quality transit at the Metro Little Tokyo/Arts District Regional Connector station in a safe manner. Since the Project is not an affordable housing development, the Project residents and tenants would have greater financial resources and rates of car ownership, which would result in increased traffic due to driving, use of shared ride services such as Uber, and increased GHG emissions. This is supported by research, including a report[1] by Transform that found that households with High-Income who live within ¼ mile of High Quality Transit Areas have higher VMT than households that are Extremely Low-Income and Low-Income in the same area. An increase in vehicle

wait times is corroborated by the City in Attachment C of the LADOT Transportation Assessment findings, located in Appendix J, pages J-22 and J-23, comparing Level of Service in Existing Conditions (2021) and Future with Project (2030). Attachment C clearly shows a significant and negative traffic impact to Little Tokyo and, as a result, increase in vehicle-related GHG emissions.

[1] https://drive.google.com/file/d/1CQnJjE3uFWHe3v4kjAM54JafjAyDgGxq/ view?usp=sharing

Response to Comment No. IND 4C-5

This comment states that there would be traffic-related Project impacts, which would result in increased GHG emissions. The commenter further provides information on VMT relative to income levels. However, the analysis of traffic impacts and GHG impacts are based on the standards and methodologies set forth by the CEQA Guidelines and the City, as the Lead Agency. Project impacts regarding GHG and transportation impacts were analyzed in Section IV.E, *Greenhouse Gas Emissions,* and Section IV.J, *Transportation*, of the Draft EIR, respectively. As analyzed therein, GHG and transportation impacts would be less than significant. With regard to transportation impacts, levels of service (LOS) of intersection operations are a non-CEQA issue that were analyzed for informational purposes in the Project's Transportation Assessment in accordance with LADOT's Transportation Assessment Guidelines (TAG). As a non-CEQA issue, LOS cannot be a significant CEQA impact. In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications. Applicable updates to the CEQA transportation analysis for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate that the Project with design modifications would not result in any significant new or substantially increased impacts.

The methodology for analyzing GHG impacts is described on pages IV.E-51 to IV.E-52 of Section IV.E, *Greenhouse Gas Emissions*, of the Draft EIR. As discussed therein, the analysis is primarily based on the Project's consistency with applicable GHG reduction plans and policies, as well as providing a determination as to whether the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. As indicated on page IV.E-54, it is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions resulting from Project-related incremental (net) increases from emissions sources, such as emissions from the use of on-road mobile vehicles, electricity, and natural gas, compared to existing conditions. Thus, the determination of GHG emissions impacts analyzed the whole of the Project, including traffic-related emissions, to determine the overall net increase in GHG emissions from the Project. As indicated in the impact analysis in Section IV.E, *Greenhouse Gas Emissions*, of the Draft EIR, there is no quantified threshold to analyze the significance of GHG impacts. Accordingly, as analyzed in Section IV.E, *Greenhouse Gas Emissions*, of the Draft EIR, since the Project would not conflict with applicable plans, regulations or goals, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the

environment. Thus, Project impacts related to GHG emissions would be less than significant. While there would be increased vehicle traffic generated by the Project compared to existing conditions, this does not indicate a significant transportation or GHG impact under CEQA.

In addition, refer to Appendix C of this Final EIR for technical data related to GHG emissions associated with the Project with design modifications. Applicable updates to Section IV.E, *Greenhouse Gas Emissions*, of the Draft EIR, associated with the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 4C-6

As Little Tokyo and the surrounding area are recognized as an Environmental Justice community and already overburdened by existing air quality challenges, the Project and the City should do more to ensure that transportation-related emission impacts are properly mitigated. I support and emphasize the importance of the mitigations included in the public comment letter submitted by the Little Tokyo Community Council on Dec.8, such as:

- Through its own funds, the Project should build and maintain a hardened, landscaped protected bicycle lane along Central Avenue from 5th Street to First Street, which would take users between the Project and the Metro Little Tokyo/Arts District Regional Connector station.

- Through its own funds, the Project should build infrastructure supportive of a Pedestrian Enhanced Network on streets connecting Project tenants and residents between Metro Little Tokyo/Arts District Regional Connector station and the Arts District.

Response to Comment No. IND 4C-6

This comment reiterates suggested measures to be taken by the Project Applicant to enhance the bicycle and pedestrian system in the local area. These suggested measures are similarly stated in Comment No. ORG 2B-15. Please refer to Response to Comment No. ORG 2B-15, which addresses these suggested measures. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 4C-7

- The Draft EIR does not sufficiently provide details nor analysis on how the Project will deal with stormwater runoff and how it will mitigate impacts from stormwater runoff. On page II-51, the Draft EIR says: *"The Project would incorporate water conservation and rainwater management strategies such as 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."* This information is insufficient. The size and scale of the buildings in the Project increases the amount of impervious surfaces channeling rainwater. The rapid release of rainwater can lead to flash flooding in streets and low-lying areas, causing damage to property and infrastructure. Central Avenue is prone to flooding during large rainstorms and the Project could exacerbate these problems. In addition, due to proximity of the Project to the Los Angeles River (approx. 3,250 ft./0.6 miles), I am concerned that the stormwater runoff from the Project would introduce pollutants such as trash and debris, bacteria and viruses, oil and grease, sediments, nutrients, metals, and toxic chemicals that can negatively affect the surrounding streets and the L.A. River, such as plant and animal life, and public health.

  From our experience as Angelenos dealing with impacts from climate change and drought, managing stormwater runoff is practical. It is important that new developments incorporate stormwater capture and infiltration strategies that will help replenish local aquifers. Therefore, the Project should provide greater detail on stormwater impacts to the surrounding area caused by the Project, how the Project will mitigate stormwater impacts resulting from a large storm, how the Project will meet and exceed best practices for stormwater management, and how it complies with Local, State, and Federal regulations on stormwater management.

Response to Comment No. IND 4C-7

This comment asks for greater detail regarding stormwater runoff and management. Please refer to Response to Comment No. IND 4A-7, which addresses these issues.

Comment No. IND 4C-8

- In Table IV.L.1-7, Estimated Project Water Demand, the Project Draft EIR includes several car washes as proposed uses in buildings 1,5,6, 7, 8, 9, and 10. The Table estimates that 42 cars will be cleaned daily, using 40 gallons per day. Used car wash water is considered industrial wastewater and may include toxic substances such as automotive fluids (e.g., motor oil, gasoline, antifreeze, brake fluid, and transmission fluid) and heavy metals such as zinc, copper, and lead. Use of the City's drainage system to discharge industrial water is a violation of city ordinance and I am concerned that used car wash water would negatively impact the surrounding environment. However, there is no further information in the Draft EIR about how the Project plans to mitigate the impacts of the proposed car washes located on the property. Therefore,

the Project should provide additional details about the proposed car washes, what potential toxic chemicals the Public would be exposed to, as well as how the Project proposes to mitigate the environmental impacts of the car washes.

Response to Comment No. IND 4C-8

This comment expresses concerns about car wash water being discharged into the City's drainage system. As with any business use on the Project Site or elsewhere, operations would be subject to all applicable local and State regulations pertaining to water quality and the use of hazardous materials, as well as obtaining permits from the City to operate. Through compliance with local and State regulations, as well as conditions to be implemented via the City permitting processes, to prevent toxic substances from entering the City's drainage system, no significant environmental impacts related to the Project's proposed car washes would occur.

Comment No. IND 4C-9

- I am concerned that the Project will present a number of significant and unavoidable construction impacts (air quality, noise, and vibration) to residents, small businesses and cultural and historic resources in Little Tokyo, such as the Higashi Honganji Buddhist Temple, which is less than 780 feet away from the Project. The temple is a sacred space for the community, providing prayer services, childcare services and important cultural events such as *obon*, which commemorates and remembers deceased ancestors. As stated in section IV.A Air Quality of the Draft EIR, the Project's air quality impacts would be cumulative, meaning that they would add to the existing air quality impacts in the surrounding area. This Project must provide additional mitigations to ensure that Little Tokyo's residents, businesses, religious and cultural institutions, are not overburdened by these air quality impacts during all phases of construction. The Project should include, as mitigation for the severity and length of time of its construction impacts, lowering the height of its buildings.

Response to Comment No. IND 4C-9

This comment expresses concerns regarding the Project's significant and unavoidable impacts related to air quality, noise, and vibration on residents, small businesses, and cultural and historic resources in Little Tokyo, such as the Higashi Honganji Buddhist Temple. The comment further expresses concerns regarding cumulative air quality impacts and states that the Project should lower the height of its buildings as mitigation for the severity and length of time of its construction impacts. These same concerns and suggestions are similarly included in Comment Nos. ORG 2B-29 and ORG 2B-31. Please refer to Response to Comment Nos. ORG 2B-29 and ORG 2B-31, which address these comments. Also, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories. As indicated in Section III, *Revisions, Clarifications and*

Corrections to the Draft EIR, of this Final EIR, the Project with design modifications would not result in any significant new or substantially increased impacts.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 4C-10

> Additionally, the potential demolition, in whole or in part, of the six-story historic building on the corner of Fourth and Central presents a number of health and air quality challenges due to the likely presence of lead paint and asbestos in the building. Additionally, the thawing of the historic building may release harmful refrigerants to the surrounding area. Due to these significant health threats, the Project should provide in its Final EIR, a complete and detailed audit of toxic chemicals and mitigation plan, including methods of disposal and containment, to the Public.

Response to Comment No. IND 4C-10

This comment expresses general concerns regarding asbestos and lead based paint removal, as well as the release of refrigerants during the thawing of the Los Angeles Cold Storage Building. With regard to hazardous materials, including asbestos and lead-based paint removal, such impacts were determined to be less than significant as evaluated in the Project's Initial Study, which is included in Appendix A of the Draft EIR. As discussed on pages 83 and 84 on the Initial Study, asbestos and lead-based paint removal activities are highly-regulated construction activities. Adherence to standard construction practices and compliance with existing regulations would ensure the Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. In addition, a health risk assessment was prepared for the Project with design modifications, which is included in Appendix B, Health Risk Assessment, of this Final EIR. As discussed in Response to Comment Nos. AG 4B-3 to AG 4B-5, the Project would not result in health risks above acceptable regulatory South Coast Air Quality Management District (SCAQMD) thresholds.

This comment also expresses concerns about the Project's thawing of the Los Angeles Cold Storage Building and potential release of harmful or toxic gases/substances in doing so. The thawing of the LACS Building is discussed in Section IV.B, *Cultural Resources*, of the Draft EIR. As shown on page IV.B-44, Mitigation Measure CUL-MM-3 requires preparation of a Thawing Plan for the LACS Building. No known harmful or toxic gases/substances are expected to occur with the thawing of the building. Nonetheless, the thawing of the LACS Building would be conducted under the oversight of the Los Angeles Department of Building and Safety to ensure no significant hazards occur to the public or the environment. As this comment does not provide substantial evidence

supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. IND 4C-11

- Lastly, it has come to my attention that the Project applied for SB7 Environmental Leadership Development Project certification, concurrent to its local EIR process. However, I want to point out that the Project's TDM measures included in the Project's EDLP application, Exhibit 4, Transportation Efficiency Analysis (available here: https://opr.ca.gov/ceqa/judicial-streamlining/environmental-leadership.html), are not consistent with the measures employed in the Project's Draft EIR. The discrepancies in the TDM measures included in the Draft EIR and the ELDP application, result in different VMT results. In the Project Draft EIR, on IV.J-35, it states, "As calculated by the VMT Calculator, the Project is estimated to generate a total of 13,724 daily vehicle trips and a total daily VMT of 89,694." The Project's ELDP application, in comparison, claims 12,262 daily vehicle trips and a total daily VMT of 80,575 {Exhibit 4, page 8).

  By providing different TDM measures resulting in different VMT results, and thus different transportation and GHG impacts during a Draft EIR review, the Project proponents have shown that they do not respect the Public review process. The Project has presented two different VMT analysis concurrently under public review. The Public cannot reasonably be expected to review the environmental impacts of the Project if the information is different and keeps changing based on what is convenient and advantageous to the developer.

  By utilizing different information to lower the Project's VMT in its State ELDP program, the Project stands to benefit by receiving expedited judicial review in CEQA-related legal cases. Yet, the People of Los Angeles stand to lose by not having a consistent set of information to evaluate the Project's impacts under CEQA. Given that the Project has shown that it does not respect the CEQA public review process, the Lead Agency should cancel the Project, or at the very least, restart the EIR process.

Response to Comment No. IND 4C-11

The comment expresses concern that the Project's TDM measures included in the Project's Environmental Leadership Development Project (EDLP) application are not consistent with the measures employed in the Project's Draft EIR. The Project would implement TDM measures outlined in the Draft EIR to meet the California Environmental Quality Act (CEQA) requirements. As discussed on page IV.J-32 of the Draft EIR, the Project would be subject to the City's TDM Ordinance. For the purposes of evaluating the Project's potential for significant transportation impacts under CEQA, the Project's transportation analysis in the Draft EIR accounted for the City's requirements as well as the additional TDM and vehicle trip reduction measures that would be sufficient to demonstrate less than significant impacts under CEQA. Also, the Draft EIR VMT analysis only took credit for the TDM measures discussed in the Draft EIR.

However, ELDP certification is a completely voluntary process that is distinct from and not required by CEQA. Projects seeking ELDP certification are required to achieve a transportation efficiency of 15 percent or more than a project with similar size, capacity, and location type. As detailed in Exhibit 4 of the ELDP Application, to achieve ELDP requirements, the Project would implement the TDM Program measures outlined in the Draft EIR plus additional TDM measures, which are discussed on pages 11 and 12 of the ELDP Application. The Governor has issued ELDP certification for the Project. As such, these additional TDM measures will be implemented by the Project since it was certified as an ELDP. Also, note that the LADOT Assessment letter for the Project, dated September 8, 2022 (included in Appendix J of the Draft EIR), states that the developer agreed to additional TDM measures to be enforced through a Development Agreement.

Although there is a discrepancy between the ELDP application and the Draft EIR as it relates to the TDM measures, the additional TDM measures in the ELDP application would ensure that the Project would achieve a minimum of 15 percent transportation efficiency, which is required for ELDP certification, although it is not otherwise required by CEQA or the City. Thus, the Draft EIR presented a worst-case scenario and still determined that VMT impacts would be less than significant. Therefore, the Project's analysis of TDM measures and corresponding VMT results in the Draft EIR and the ELDP Application are appropriate and no revisions to the Draft EIR are required.

Comment No. IND 4C-12

The above issues are very important to me. As I mentioned, I am a longtime stakeholder of Little Tokyo, having worked at different organizations in the Little Tokyo community for over 15 years. I continue to serve as a board member of the Little Tokyo Community Council, a non-profit coalition of residents, small businesses, religious and cultural institutions dedicated to protecting, preserving, and promoting this cultural/historic district.

Given that the City of Los Angeles is in a housing crisis, I support new development in and around Little Tokyo. While the LEED-certified goals are admirable and desirable, this Project is a luxury development that seeks to take advantage of, but does little to connect to its surrounding neighborhoods. With its terraces, pools and meditation areas, the Project's amenities are clearly aimed at high-income renters and tenants. This is the opposite of what Los Angeles desperately needs. We need affordable housing, not more luxury rentals, nor another boutique, luxury hotel.

I fully support the information contained in the Little Tokyo Community Council's public comment letter submitted on Friday, Dec. 8, as well as their vision for a project is a model for sustainability; whose size and scale better integrates with its surrounding neighborhoods; advances walkability, biking and transit; and provides housing that is both affordable and encourages long-term ownership.

Thank you for your consideration of these comments.

Response to Comment No. IND 4C-12

This comment states that the Project would be comprised of a luxury development as opposed to needed affordable housing. This comment also makes reference of support for a letter provided by LTCC. This letter and responses to the comments provided therein are provided as Comment Letter ORG 2B and Response to Comment Nos. ORG 2B-1 through ORG 2B-42, respectively.

The Project includes an affordable housing component. As stated on page II-19, in Chapter II, *Project Description*, of the Draft EIR, the Project would set aside 5 percent of the total rental units for Extremely Low-Income Households. In addition, and consistent with Measure JJJ, between 11 percent and 40 percent of the total units built would be set aside for Very Low-, Low-, or Moderate-income households. In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR. As shown therein, the Project's hotel has been removed from the Project, and 68 additional residential units have been added to the Project. An overview of the Project design modifications is provided in Response to Comment No. IND 4C-3. This comment does not raise any additional issues with respect to the content or adequacy of the Draft EIR. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 5

Sarah Fukui
Received November 16, 2023

Comment No. IND 5-1

I am a stakeholder in the Little Tokyo community and am very concerned about the impacts of the aforementioned project on our neighborhood. The proposed project is of an unprecedented size and scale for the immediate surroundings. It will drastically alter the existing community -- Little Tokyo is the 2nd oldest neighborhood in Los Angeles. It is a historic community, which will be dramatically impacted by this development. The initially provided 45 day comment period for the draft EIR of this project is nowhere near the sufficient amount of time necessary to review this lengthy document.

As such, I am in support of this letter requesting an extension to the comment period through January 15, 2024. Thank you for your consideration.

Response to Comment No. IND 5-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City.

This comment states that the Project is of an unprecedented size and scale for the immediate surroundings and will alter the existing historic Little Tokyo community. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment requests an extension of the Draft EIR public review period to January 15, 2024. The original public review comment period was extended by the City to conclude on December 11, 2023. As such, the 61-day public review comment period exceeded the minimum 45-day review period as required by the CEQA Guidelines Section 15105(a) for Draft EIRs submitted to the State Clearinghouse for public review by state agencies. The Project's public review period also exceeded the maximum review period duration of 60 days per Section 15105(a), with such exceedances only permitted when there are unusual circumstances. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter for further discussion of the Project's Draft EIR comment period extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines.

Comment No. IND 5-2

Attachment

Response to Comment No. IND 5-2

The comment letter includes a copy of an extension request letter, which is included as Comment No.ORG 2A-3. Please refer to Response to Comment No. ORG 2A-3, which addresses the comments in the attached letter.

Comment Letter No. IND 6

Kaz Matamura
Received November 16, 2023

Comment No. IND 6-1

I am a stakeholder in the Little Tokyo community and am very concerned about the impacts of the aforementioned project on our neighborhood. The proposed project is of an unprecedented size and scale for the immediate surroundings. It will drastically alter the existing community -- Little Tokyo is the 2nd oldest neighborhood in Los Angeles. It is a historic community, which will be dramatically impacted by this development. The initially provided 45 day comment period for the draft EIR of this project is nowhere near the sufficient amount of time necessary to review this lengthy document.

As such, I am in support of this letter requesting an extension to the comment period through January 15, 2024. Thank you for your consideration.

Response to Comment No. IND 6-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. The content in this comment is the same as Comment No. IND 5-1. Refer to Response to Comment No. IND 5-1 which responds to this comment.

Comment No. IND 6-2

Attachment

Response to Comment No. IND 6-2

The comment letter includes a copy of an extension request letter, which is included as Comment No.ORG 2A-3. Please refer to Response to Comment No. ORG 2A-3, which addresses the comments in the attached letter.

Comment Letter No. IND 7

Joy Yamaguchi
Received November 16, 2023

Comment No. IND 7-1

I work in and am actively involved in multiple community organizations within Little Tokyo. I am extremely concerned about the impacts of the Fourth and Central Project on our neighborhood.

The proposed project is of an unprecedented size and scale for the immediate surrounds. It will drastically alter the existing community. Little Tokyo is the 2nd oldest neighborhood in Los Angeles. It is a historic community which will be dramatically impacted by this development.

The initially provided 45 day comment period for the draft EIR of this project is nowhere near the sufficient amount of time necessary to review this lengthy document. Even as I have committed time already to review, it is inaccessible especially as someone who is not well versed in public policy.

As such, I am in strong support of this letter requesting an extension to the comment period through January 15, 2024.

Thank you for your time and consideration

Response to Comment No. IND 7-1

The commenter's involvement in various organizations in Little Tokyo is acknowledged by the City. The content in this comment is the same as Comment No. IND 5-1. Refer to Response to Comment No. IND 5-1 which responds to this comment.

Comment No. IND 7-2

Attachment

Response to Comment No. IND 7-2

The comment letter includes a copy of an extension request letter, which is included as Comment No.ORG 2A-3. Please refer to Response to Comment No. ORG 2A-3, which addresses the comments in the attached letter.

Comment Letter No. IND 8

Andie Kimura
Received November 16, 2023

Comment No. IND 8-1

As a stakeholder in the Little Tokyo community, I'm EXTREMELY concerned about the impacts the 400 S. Central Ave project will have on our neighborhood. The current proposal is of ridiculously GIGANTIC size and scale for the immediate surrounds. It will not only drastically alter the existing community, but the unprecedented scale will inevitably affect traffic, and affordability in surrounding communities as well.

It's completely unreasonable to ask the working public to review over 1,000 pages of permit/code/governmental jargon in a mere 45 days and truly seems irresponsible of of [sic] the City to not allow a longer period given the irreversible impacts a project at this scale would create.

As such, I am in support of this letter requesting an extension to the comment period through January 15, 2024. I appreciate your consideration.

Response to Comment No. IND 8-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment raises similar concerns regarding the Project size, impacts on the Little Tokyo historic community, and length of the public comment period as included in Comment No. IND 5-1. Refer to Response to Comment No. IND 5-1 which responds to these issues in the comment. The commenter also raises concerns about traffic. The Project's CEQA transportation impacts were evaluated in Section IV.J, *Transportation*, of the Draft EIR, as required by CEQA and the City of Los Angeles Department of Transportation (LADOT). The Project's impacts from vehicle trips generated by the Project on intersection operations in the Project vicinity are included in Chapter 5, *Non-CEQA Transportation Analysis*, of the Project's Transportation Assessment (TA), included as Appendix J, of the Draft EIR. The results of the analyses of non-CEQA topics and the proposed corrective actions identified in the TA would be addressed through potential Project conditions of approval. Refer to Response to Comment No. IND 4A-2 for additional discussion of the Project's CEQA impacts as evaluated in Section IV.J, *Transportation*, of the Draft EIR, and the non-CEQA impacts analyzed in Chapter 5 of the TA.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications. Applicable updates to the CEQA transportation analysis for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate that the Project with design modifications will not result in any significant new or substantially increased impacts.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 8-2

Attachment

Response to Comment No. IND 8-2

The comment letter includes a copy of an extension request letter, which is included as Comment No.ORG 2A-3. Please refer to Response to Comment No. ORG 2A-3, which addresses the comments in the attached letter.

Comment Letter No. IND 9

Edward Escarsega
Received November 17, 2023

Comment No. IND 9-1

I am a stakeholder in the Little Tokyo community and am very concerned about the impacts of the aforementioned project on our neighborhood. The proposed project is of an unprecedented size and scale for the immediate surrounds. It will drastically alter the existing community. Little Tokyo is the 2nd oldest neighborhood in Los Angeles. It is a historic community which will be dramatically impacted by this development.

The initially provided 45 day comment period for the draft EIR of this project is nowhere near the sufficient amount of time necessary to review this lengthy document.

As such, I am in support of this letter requesting an extension to the comment period through January 15, 2024.

Thank you for your consideration.

Response to Comment No. IND 9-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. The content in this comment is the same as Comment No. IND 5-1. Refer to Response to Comment No. IND 5-1 which responds to this comment.

Comment No. IND 9-2

Attachment

Response to Comment No. IND 9-2

The comment letter includes a copy of an extension request letter, which is included as Comment No.ORG 2A-3. Please refer to Response to Comment No. ORG 2A-3, which addresses the comments in the attached letter.

Comment Letter No. IND 10

Alain Vincent Pastor
448 S. Hill Street, Suite #815
Los Angeles, CA 90013
Received November 20, 2023

Comment No. IND 10-1

My name is Alain, I am a local realtor in and around DTLA. I saw your post about the project on 4th and central. I wanted to let you know that lam [sic] available for any research or help with lease and or sales or purchase of residential unts. [sic]

Let me know how I can help.

Thank you,

Response to Comment No. IND 10-1

This commenter expresses their availability to help with lease and or sales or purchase of the Project's residential units. The comment does not raise any issues with respect to the content or adequacy of the Draft EIR. As such, no further response is necessary.

Comment Letter No. IND 11

Mike Callhan
Received November 20, 2023

Comment No. IND 11-1

A new project in the downtown area seeks to transform 7+ acres of industrial warehouses and vacant land to a mixed use development. One of the warehouses to be impacted is the historic 1903/07 L.A. Ice and Cold Storage Company building located at 4th and Central. This warehouse is one of the oldest cold storage facilities in the city, and it represents a tangible link to the city's industrial and agricultural history. I fully support the L.A. Conservancy position that the building should be adaptively reused rather than demolished. In addition to its historic function, the building was designed by famous architect George Wyman (architect of the landmarked Bradbury building).

In recognizing it's historic use, I would like to see some portion of the existing refrigeration system retained. Perhaps the ground floor retail could house grocery markets, meat butchers, and wine merchants. All have some need for refrigerated storage. Another idea would be to construct an ice rink, either indoors or on the roof. Every housing complex includes the typical pool in following the sunny California theme, none serve those with interest in winter sports. An ice rink, open to the public, would relate to the theme of the building and provide a valuable recreation facility for area youth.

Thanks for this opportunity to provide input.

Response to Comment No. IND 11-1

This comment supports the adaptive reuse of the LACS building, rather than its demolition. The commenter also offers suggestions for uses within the potential adaptively reused LACS Building. The Draft EIR addresses impacts to historic resources in Section IV.B, *Cultural Resources*, of the Draft EIR. As analyzed therein and as stated in Chapter II, *Project Description*, of the Draft EIR, the Project intends to adaptively reuse a portion (West Volume) of the six-story LACS cold storage warehouse building located on the North Site but would demolish the remaining portion of the LACS Building (i.e., East Volume) and the attached single-story warehouse building (i.e., North Wing) on the North Site. The North Wing is not part of the LACS Building. The Project would retain the West Volume of the LACS Building if a qualified structural engineer confirms through additional testing that, once the building is no longer in use as a cold storage facility, it would be structurally sound, and the historical features would remain intact following the thawing process.

Responses to L.A. Conservancy's comment letter are provided in Response to Comment Nos. ORG 7-2 to ORG 7-9. As discussed in Response to Comment No. ORG 7-3, due to the extent and severity of the existing damage, the anticipated damage to the bricks and mortar once the building is thawed, and the programmatic requirements of the

Project, the retention, rehabilitation, and adaptive reuse of the East Volume is not feasible or practical from a structural, economic, or historic preservation standpoint. Therefore, the Project does not include mitigation measures to explore the potential retention of the East Volume of the LACS Building.

This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 12

Christine Hikido
Received November 21, 2023

Comment No. IND 12-1

I am a stakeholder in the Little Tokyo community and am very concerned about the impacts of the aforementioned project on our neighborhood. The proposed project is of an unprecedented size and scale for the immediate surrounds. It will drastically alter the existing community. Little Tokyo is the 2nd oldest neighborhood in Los Angeles. It is a historic community which will be dramatically impacted by this development.

The initially provided 45 day comment period for the draft EIR of this project is nowhere near the sufficient amount of time necessary to review this lengthy document.

As such, I am in support of this letter requesting an extension to the comment period through January 15, 2024.

Thank you for your consideration,

Response to Comment No. IND 12-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. The content in this comment is the same as Comment No. IND 5-1. Refer to Response to Comment No. IND 5-1 which responds to this comment.

Comment No. IND 12-2

Attachment

Response to Comment No. IND 12-2

The comment letter includes a copy of an extension request letter, which is included as Comment No.ORG 2A-3. Please refer to Response to Comment No. ORG 2A-3, which addresses the comments in the attached letter.

Comment Letter No. IND 13

David Solomon
Received November 21, 2023

Comment No. IND 13-1

Thank you for the chance to comment on the Fourth & Central project. Young's Holdings is a family-owned business located immediately south of the project site at 500 S. Central Ave. We are long-time stakeholders and have called Larry Rauch and the LA Cold Storage family our neighbors for 50+ years.

As immediate neighbors to the project, we were eager to see what the findings of the draft environmental impact report might show in terms of impact on our operations. After going over the document, we are satisfied with its findings. The temporary constructions impacts are nothing that our team cannot handle. Our relationship with Larry on this project has been collaborative so far, and we do not expect any change once construction starts.

It is also reassuring to see that this project will be built with union labor. Our initial concerns about navigating the complexities of deliveries, road closures, etc. are much smaller knowing that we will be working with experienced professionals.

The Arts District continues to prove itself as one of the most promising and dynamic communities in all of Los Angeles. Recent developments like the Regional Connector, Sixth Street Viaduct, and the passing of the Downtown LA 2040 plan are very exciting. We are excited that this project will build on that progress and continue the revitalization of this area.

Thank you for the opportunity to comment.

Response to Comment No. IND 13-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 14

Sergio Moreno
720 East 7th St.
Los Angeles, CA 90021
Received November 21, 2023

Comment No. IND 14-1

Thank you for the opportunity to comment on the Fourth and Central project. As a member of the Downtown Industrial District Business Improvement District, I am supportive of new businesses joining our community as well as bold projects that make that happen. This area of Downtown has steadily grown over the years with all kinds of exciting businesses setting up shop here. It is very encouraging to finally see the release of the draft environmental impact report. This project cannot come soon enough.

The Fourth and Central project represents an amazing opportunity for new businesses to open, and existing ones to expand. As a city, we should be building space for our most creative Angelenos to thrive. 93K square feet of retail and restaurant space gives people the chance to open up their first brick-and-mortar shops.

The same goes for the 400K square feet of new office space that is proposed as part of the project. With many companies beginning to return to the office on a more regular basis, it is best that we create work environments that are designed with all the lessons we learned during the pandemic in mind.

Additionally, the location of this project makes it the perfect place to create more space for people and businesses. With such a close proximity to mass transit, both lines that are already built and the others planned for this area, Fourth and Central is situated in a logical location for dense development. The Regional Connector and West Santa Ana Branch will make it possible for people across the entire city and county to visit the Arts District and all it has to offer. The bike infrastructure, connective design, and plentiful open space make this an especially inviting and accessible place for anyone and everyone to enjoy.

Thank you for this opportunity to make myself heard.

Response to Comment No. IND 14-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 15

Ernie Doizaki
Received November 21, 2023

Comment No. IND 15-1

As decades-long neighbors of Larry Rauch and the Los Angeles Cold Storage facility, my family and I are very pleased that the draft environmental impact report has finally been released. Larry is an active and prominent member of our Industrial District community. Whether it is his involvement with the Central City East Association and Downtown Industrial District Business Improvement District or his contributions to the local cold storage community, Larry is as great of a neighbor you could ask for. He has involved us in this development process from day one and provided space for our voices to be heard. We are very happy that this project is making progress.

This project and all that it stands for aligns with mine and my family's values. Our city is in desperate need of more housing, especially affordable housing, and we are immensely happy to see the large number of affordable housing units included in this project. As cold storage operators, the majority of our workforce are middle-class, blue-collar people. The housing crisis takes its toll on everyone, especially our employees, who often commute from across the city and county to our facilities. It is reassuring to see that this project will include housing opportunities for people of all incomes.

On that same note, we appreciate Continuum Partners' commitment to utilizing skilled and trained workers from the local community. Thousands of good-paying union jobs are critical to uplifting our middle class partners. A project of this scale will entail years and years of multi-phase construction that will sustain many workers. Additionally, the extensive mitigation measures included in this report really give my family and I peace of mind. Seeing that the impacts of the project are only temporary and limited to during the construction phase was reassuring.

This project will be a gamechanger for the neighborhood. We look forward to its approval.

Response to Comment No. IND 15-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 16

Cindy Lin and Gabriel McCormick
Received November 22, 2023

Comment No. IND 16-1

My husband and I are residents and homeowners in Little Tokyo, residing at 222 S Central Ave #400. I am very concerned about the impacts of the aforementioned project on Little Tokyo and the surrounding neighborhoods. The proposed project is of an unprecedented size and scale in this area of Los Angeles and will drastically alter the existing community. Little Tokyo is the 2nd oldest neighborhood in Los Angeles. It is a historic community which will be dramatically impacted by this development.

Additionally, the notice to review the draft EIR and provide comment within the initially provided 45 day period fis [sic] utterly insufficient for anyone, but especially for non-real estate professionals to read, comprehend, and meaningfully respond to, which is the majority of the affected stakeholders including ourselves.

As such, I am in support of this letter requesting an extension to the comment period through January 15, 2024.

Response to Comment No. IND 16-1

The commenter's identification as a resident in Little Tokyo is acknowledged by the City. This comment raises concerns about traffic. Refer to Response to Comment No. IND 8-1, which addresses traffic impacts. This comment also raises concerns regarding the Project size, impacts on the Little Tokyo historic community, and the length of the public comment period which are similarly included in Comment No. IND 5-1. Refer to Response to Comment No. IND 5-1 which responds to these issues in the comment.

Comment No. IND 16-2

Attachment

Response to Comment No. IND 16-2

The comment letter includes a copy of an extension request letter, which is included as Comment No.ORG 2A-3. Please refer to Response to Comment No. ORG 2A-3, which addresses the comments in the attached letter.

Comment Letter No. IND 17

Stephanie Caridad
Received November 22, 2023

Comment No. IND 17-1

I'm a Little Tokyo resident and am very concerned about the impacts of the Cold Storage project on our neighborhood. The proposed project is of an unprecedented size and scale in proportion to the neighboring communities, Skid Row and Little Tokyo.

The project will drastically alter the existing community. Little Tokyo is the 2nd oldest neighborhood in Los Angeles. It is a historic community which will be dramatically impacted by this development.

The initially provided 45 day comment period for the draft EIR of this project is nowhere near the sufficient amount of time necessary to review this lengthy document.

As such, I am in support of this letter requesting an extension to the comment period through January 15, 2024.

Thank you for your consideration,

Response to Comment No. IND 17-1

The commenter's identification as a resident in Little Tokyo is acknowledged by the City. The content in this comment is to the same as Comment No. IND 5-1. Refer to Response to Comment No. IND 5-1 which responds to this comment.

Comment No. IND 17-2

Attachment

Response to Comment No. IND 17-2

The comment letter includes a copy of an extension request letter, which is included as Comment No.ORG 2A-3. Please refer to Response to Comment No. ORG 2A-3, which addresses the comments in the attached letter.

Comment Letter No. IND 18

Sheryl Quock
Received November 25, 2023

Comment No. IND 18-1

I am a stakeholder in the Little Tokyo community and am very concerned about the impacts of the aforementioned project on our neighborhood. The proposed project is of an unprecedented size and scale for the immediate surrounds. It will drastically alter the existing community. Little Tokyo is the 2nd oldest neighborhood in Los Angeles. It is a historic community which will be dramatically impacted by this development.

The initially provided 45 day comment period for the draft EIR of this project is nowhere near the sufficient amount of time necessary to review this lengthy document.

As such, I am in support of this letter requesting an extension to the comment period through January 15, 2024.

Thank you for your consideration,

Response to Comment No. IND 18-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. The content in this comment is the same as Comment No. IND 5-1. Refer to Response to Comment No. IND 5-1 which responds to this comment.

Comment No. IND 18-2

Attachment

Response to Comment No. IND 18-2

The comment letter includes a copy of an extension request letter, which is included as Comment No.ORG 2A-3. Please refer to Response to Comment No. ORG 2A-3, which addresses the comments in the attached letter.

Comment Letter No. IND 19

George Lu
Received November 26 and December 8, 2023

Comment No. IND 19-1

I'm writing to provide some comments on the EIR referenced above.

The attached article indicates that the project applicant, Continuum Partners, is partnering with Los Angeles Cold Storage Co. and that the existing warehouse would be relocated before construction of the Fourth & Central Project.

The EIR should address impacts associated with relocation of the existing warehouse. Even if the new site of the warehouse is not yet known, the EIR should address the potential for associated impacts to occur given these impacts/emissions would not cease to exist because of the project.

It's an oversight and misrepresentation of the full impacts if the EIR does not mention that the warehouse will be relocated to another site. Even if the new location of the warehouse is not known at this time, or contingent on something, the relocation should be mentioned and the potential impacts associated with relocation should be analyzed as part of the project. The City needs to be transparent to comply with CEQA. The air pollutant and GHG estimates provided in the EIR falsely suggest that the warehouse would simply disappear and all the truck travel to and from the warehouse, and associated GHGs (and other air pollutants), would no longer be emitted as a result (Table IV.A-13 and Table IV.E-11). Even if the new location of the warehouse is not known at this time, a rough estimate of its emissions of air pollutants and GHGs should be estimated and, most importantly, these emissions should not be subtracted from the levels of emissions associated with operation of the Fourth & Central Project.

As stated on page 164 of the CEQA Guidelines, "the lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect. (*Citizens Assoc. For Sensible Development of Bishop Area v. County of Inyo* (1985) 172 Cal.App.3d 151)." This EIR is piecemealing the true impacts of the project and thus with the current analysis should be deemed deficient. Given California is at the forefront of climate action globally and the exact requirements of CEQA stated above, it is necessary that the EIR that [sic] addresses the impacts of the entire project and executes the analysis in an accurate and transparent fashion.

Thank you for your consideration.

Response to Comment No. IND 19-1

This comment raises concerns regarding air quality and GHG impacts with an inquiry as to whether the existing cold storage facility will be relocated elsewhere, thus, simply

displacing the existing facility emissions. The content in this comment is similar to Comment No. ORG 4-2, ORG 4-4, and IND 2-1. Refer to Response to Comment No. ORG 4-2, ORG 4-4, and IND 2-1, which addresses these concerns.

Comment No. IND 19-2

Thank you very much Tamar. I've actually been re-reading the EIR and have a revised comment here. I'd be okay if you add this or swap it out with my previous comment as this is a bit more robust after spending the extra time to review.

The estimate of regional operational emissions of criteria pollutants summarized in Table IV.A-20 in the EIR is flawed. Consider emissions of NOx, for example, Table IV.A-20 implies that the new land uses would generate 80 pounds of NOx per day and that the 252 pounds per day of NOx generated by the existing cold warehouse facilities would disappear as a result of the project. However, the EIR does not explain why these emissions would simply disappear. The "Existing VMT" table in Appendix B, Air Quality/ Greenhouse Gas Emissions Technical Documentation, indicates that the existing cold warehouse facility produces 39,515 VMT per day and that more than 90% of this VMT is by large trucks, which would result in a fair amount of NOx. It's unrealistic for the analysis to assume that development of the Fourth & Central Project would result in this VMT no longer occurring in California or even in the air basin. Another table on the same page of Appendix B shows a breakdown of where these existing truck trips are traveling. It's unrealistic to think that the goods being picked up from or delivered to the Ports would no longer be picked up from or delivered to the Ports simply because the existing cold warehouse on the Fourth & Central site would be demolished. It's unrealistic to assume that the trucks delivering goods from cold storage in Los Angeles to or from other parts of Southern California, to or from Northern California, or to or from other states would no longer make deliveries to or from these locations. It's important for the City of Los Angeles to recognize that NOx and the other pollutants listed in Table IV.A-20 are pollutants of regional concern and when/if these operations and subsequent emissions are relocated in the air basin, the impact would not be removed at all. This is why Table IV.A-20 is titled Estimated Maximum Mitigated Regional Operational Emissions. The air quality analysis should address how the project would effect emissions of these pollutants in the air basin. The importance of examining air quality at the air basin-wide level is explained on pages IV.A-2through IV.A-10 in the EIR, and the attainment status is reported for the South Coast Air Basin in Table IV.A-1.

Table IV.A-20 shows that Fourth & Central project operations would result in 80 pounds per day of NOx, a level that exceeds the SCAQMD threshold of 55 pounds per day. This is a significant impact that should be mitigated.

Response to Comment No. IND 19-2

This comment states that the analysis of air quality impacts is flawed because it compares potential Project emissions to emissions from existing uses and analyzes impacts based on net Project emissions. The commenter also presumes that the existing truck trips from

the Project Site would continue to occur elsewhere in the air basin; however, the existing facility operator has not taken any action to move the current site operations to another site within the Basin or chosen a potential relocation site. With implementation of the Project, the existing cold storage facilities would only be removed from the Project Site. As such, whether the existing facilities will continue to operate elsewhere is speculative and not required to be analyzed under CEQA. Thus, there is no potential for the Draft EIR to misrepresent the Project's air quality and GHG impacts as evaluated in the Draft EIR. Since there is no evidence that the current site operations would be replaced or relocated, any analysis of potential replacement project impacts would be speculation, which is not required by CEQA pursuant to CEQA Guidelines Section 15145.

The analysis in Table IV.20 in Section IV.A, *Air Quality*, along with the rest of the air quality impact analyses, follows the guidelines, standards, and methodologies of the South Coast Air Quality Management District (SCAQMD) guidance documents, which are referenced under Subsection b), Methodology, on page IV.A-35 of the Draft EIR. The methodologies for the Project's air quality impact analyses are explained on pages IV.A-34 to IV.A-45 of the Draft EIR. As discussed therein, the net change in operational emissions is based on the difference between the existing Project Site emissions and the emissions of the Project Site at full buildout. Per the SCAQMD guidance documents, the maximum daily net emissions from operation of the Project are to be compared to the SCAQMD daily regional significance thresholds. Therefore, the emissions and impact conclusions in Table IV.A-20 appropriately analyzed the Project's emissions based on net regional emissions, which consider the removal of the existing Project Site emission sources.

Comment No. IND 19-3

In doing some additional research, it becomes even more clear that plans are in the works to move the existing cold warehouse to another location, which makes sense given the project would not remove demand for goods movement regionally:

From https://www.latimes.com/business/story/2021-04-29/fourth-central-development-arts-district, "Terms of Continuum's partnership with L.A. Cold Storage were not disclosed. 'L.A. Cold Storage will find a new home at a more fitting location, and our current site will be a new home and community to thousands of Angelenos – that gives me a tremendous amount of pride,' said President [of L.A. Cold Storage,] Larry Rauch."

From https://therealdeal.com/la/2022/03/14/continuum-in-enviro-review-on-2b-plan-for-dtla/, "Continuum formed a partnership with the property owner, Los Angeles Cold Storage, to develop the site. The deal includes relocating the business."

From https://wwvv.planningreport.com/2021/06/14/dtla-arts-district-development-plans-fourth-central-continuum-partners-mark-falcone. This piece is presented in a Q&A Format between The Planning Report and Mark Falcone of Continuum Partners:

Question by The Planning Report: "Given Continuum is partnering with Larry Rauch and actually replacing the existing Los Angeles Cold Storage building, which has long

anchored the City's produce market, speak both to where Cold Storage (refrigeration) might relocate and your take on the future land uses of the Alameda Corridor and the Arts District?"

Answer by Mark Falcone: "That industry has been an important part of that neighborhood, but it's not a dense industry from an employment standpoint. The opportunity is there, as the neighborhood transitions to more creative, office-driven enterprises, which will significantly increase the density of employment. This is great for the city of Los Angeles. It just doesn't make sense to have this massive transit infrastructure feeding a truck logistics apparatus. Larry has refrigeration systems that are decades old. The refrigeration plant on the north side of Fourth Street, runs under Fourth Street and connects to the rest of the buildings, so LA Cold Storage cannot move piecemeal. They will need to eventually upgrade and modernize their plant. With our arrangement he can take the next few years to carefully plan what that transition looks like and by the time we are ready, he will have a relocation plan worked out."

The above sources indicate that the proposed Fourth & Central development and relocation of the existing cold warehouse facility are part of the same "project" and that the entire project should be evaluated as one single project in the EIR, especially when examining impacts to air quality in the air basin. And the fact that plans are in the works to move the existing cold warehouse is yet another reason its NOx emissions should not be subtracted from the NOx level associated with the Fourth & Central Project. The EIR should be revised to evaluate the NOx emissions associated with the new relocated warehouse as well as the new Fourth & Central project. The public should be given the opportunity to comment on an EIR prepared for the entire project, rather than only one component.

Response to Comment No. IND 19-3

This comment includes references to various articles that state a plan is in place to relocate the existing on-site uses, which should be considered as part of the Project, and accounted for in the EIR's air quality analysis, including for NOx emissions. Refer to Response to Comment Nos. ORG 4-2, ORG 4-4, IND 2-1 and IND 19-2, which address this comment.

Comment No. IND 19-4

The EIR made the same error in the calculation of GHG emissions shown in Table IV.E-11of the EIR. When presenting the level of GHGs that would be emitted by the Fourth & Central Project, the EIR should not subtract out emissions from the existing cold warehouse that will be relocated. Also, while the GHG analysis focuses on whether the Fourth & Central Project would be consistent with all applicable, plans, policies, or regulations adopted for the purpose of reducing GHGs; it does not, however, examine whether the new relocated cold warehouse would be consistent with all applicable, plans, policies, or regulations adopted for the purpose of reducing GHGs. Again, the public

should be given the opportunity to comment on an EIR prepared for the entire project, rather than one component.

I appreciate that the GHG discussion includes quantification of the project's GHGs presented in Table IV.E-11 and context about how much GHGs are currently emitted in California, as provided in Table IV.E-6. This is helpful in understanding the scale of the project's GHGs.

However, the GHG levels presented in Table IV.E-6 are misleading. It shows that operation of the project would generate approximately 19,000-27,000 metric tons per year depending on which set of GHG reduction characteristics would be included in the project design, but it also subtracts out approximately 20,000 metric tons of CO2e per year from the Existing Site, which based on the evidence above is incorrectly representing the project's impact.

The EIR does not need to evaluate the emissions of a project that already exists. Table IV.E-7 shows the level of GHGs emitted by the existing operations on the project site, most of which are from "OnRoad Mobile Sources" (which presumably is mostly from truck travel). It's highly likely this level of truck activity would continue despite the development of the Fourth & Central project given the accelerating demand for the distribution and warehousing of goods in California. It is understandable that given the likely relocation of the warehouse, the trip distances and routes could change, but it is unlikely that the relocation would significantly reduce emissions and could even increase emissions depending on purchasing trends and locations. The analysis should not presume these emissions would disappear as a result of the project without evidence.

Response to Comment No. IND 19-4

This comment reiterates the presumption that the air quality impact, in addition to the GHG analysis, is flawed since it takes credit for existing uses and analyzes impacts based on net Project emissions. The commenter also presumes that the existing truck trips from the Project Site would continue to occur elsewhere in the air basin; however, the existing facility operator has not taken any action to move the current site operations to another site within the Basin nor has it chosen a potential relocation site. Refer to Response to Comment No. ORG 4-2, ORG 4-4, and IND 19-2, which addresses these comments.

Comment Letter No. IND 20

Sam Nakahira
Received November 26, 2023

Comment No. IND 20-1

We are stakeholders in the Little Tokyo community and are very concerned about the impacts of the 4th and Central Project on our neighborhood. The proposed Project is of an unprecedented size and scale for the immediate surroundings and will affect the Little Tokyo area. We firstly urge for an extension of the public comment period. The draft EIR is over 1,000 pages in length. The initially provided 45-day comment period for the draft EIR of this project is nowhere near being a sufficient amount of time to review this document - both for our community members who can read and speak English, and who read and speak in languages other than English.

While the draft Environmental Impact Report ("EIR") states that "no people or housing would be displaced...because there are no residential uses currently on the Project Site" (IV.H-24 of the draft EIR), the Project will gentrify the neighborhoods immediately adjacent to it and has the potential to displace the long-time, working-class residents and small businesses who have been a part of their respective communities for several years. This includes the community members of Little Tokyo, Skid Row, the Fashion District, and others.

The scale of gentrification that is happening in this area is much bigger with all the new massive-scale developments and tower projects in the Arts District at designated "Hybrid Industrial" zoning lots following the City-approved Downtown Community Plan. The City is complicit in playing the role of promoting "revitalization" of the area while it actually brings a massive displacement of the existing established historical community.

90,113 SF of "publicly accessible" open space at the proposed site will bring in an increase in security vis a vis police presence and surveillance in the area. With more policing, there will likely be targeted arrests and harassment of the adjacent community made up of mostly African Americans and BIPOC people. Sweeps will also increase and thus, cause more displacement of unhoused residents.

The community is concerned with the potential gentrification and displacement caused by the Project, especially with multiple high-rise mixed-use projects planned for the area, at least one of which the CPC already approved without many of us knowing. If this project gets approved, this will make it easier for other developers to come in and build high-rise buildings. With development and "revitalization," Little Tokyo, one of the oldest neighborhoods in Los Angeles, will become unrecognizable, with its legacy businesses and former residents displaced. The impacts of this project must be analyzed; it is short-sighted and lacking due diligence to neglect such analysis and to be given only 45 days for community input.

Response to Comment No. IND 20-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment states that the Project is of an unprecedented size and scale for the immediate surroundings and it will alter the existing historic Little Tokyo community. The comment also requests an extension of the EIR public review period. These comments are similarly included Comment No. IND 5-1. Refer to Response to Comment No. IND 5-1, which addresses these comments.

This comment also raises concerns regarding gentrification and displacement, which are similarly expressed in Comment Nos. ORG 1B-10 and ORG 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns.

This comment states that with increased security, there will likely be targeted arrests and harassment of the adjacent community made up of mostly African Americans and black, indigenous, and people of color (BIPOC). The commenter also states that sweeps by police will increase and thus, cause more displacement of unhoused residents. This comment expresses concern regarding increased policing of public open spaces, which the commenter speculates would result from the Project. Pursuant to CEQA Guidelines Sections 15131 and 15145, CEQA does not require that an EIR analyze social issues or engage in speculation. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nevertheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment Letter No. IND 21

Eri Yamagata
Received November 27, 2023

Comment No. IND 21-1

I am a stakeholder in the Little Tokyo community and I am very concerned about the impacts of the 4th and Central Project ("Project") on our neighborhood. The proposed Project is of an unprecedented size and scale for the immediate surroundings and will affect the Little Tokyo area with regards to the existing housing crisis and gentrification. I write to urge for an extension of the public comment period and for additional analysis as to the impact of the forthcoming Project.

Though the draft Environmental Impact Report ("EIR") states that "no people or housing would be displaced ... because there are no residential uses currently on the Project Site" (IV.H-24 of the draft EIR), members of the Little Tokyo community understand that major projects such as these do not occur in a vacuum. The Project will gentrify the neighborhoods immediately adjacent to it and has the potential to displace the long-time, working-class residents and small businesses who have been a part of their respective communities for several years. Indeed, the increased cost of rent, shuttering of local businesses, and associated residential evictions will displace the community members of Little Tokyo, Skid Row, the Fashion District and others. These impacts that were elided over in the draft EIR must be analyzed. Solutions to the disastrous consequences the Project can create must also be considered. Community members have proposed solutions such as the developer having 100% affordable housing units at the cost appropriate for the lowest income in the area available in the entire Project for working-class individuals (including those they say will be employed within the proposed development). It is imperative that the developer take such feedback into consideration before proceeding.

The draft EIR is over 1,000 pages in length, not including the over 3,000 pages of appendices. As other community stakeholders have stated in an earlier letter, an inclusive, thoughtful review of this draft EIR absolutely necessitates an extension of the public comment period. The initially provided 45 day comment period for the draft EIR of this project is nowhere near being a sufficient amount of time to review this document - both for our community members who can read and speak English, and who read and speak in languages other than English. Also many of the community members are elderly who require technical assistance in reviewing and commenting on these documents. We must have an extension so that all members of the Little Tokyo community can meaningfully participate in this process.

Little Tokyo is the second oldest neighborhood in Los Angeles and one of the last remaining Japantowns in the United States. The risk of losing the businesses and community members who make up our community merely to "improve the aesthetics of the neighborhood" (as the developer remarked earlier on in this process) is not a risk we

are willing to take. I again urge for an extension of the public comment period and for additional analysis as to the impact of the forthcoming Project.

Thank you for your consideration,

Response to Comment No. IND 21-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment states that the Project is of an unprecedented size and scale for the immediate surroundings and it will alter the existing historic Little Tokyo community. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

This comment also raises concerns regarding displacement and gentrification, which are similarly expressed in Comment Nos. ORG 1B-10 and ORG 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment also requests an extension of the Draft EIR public review period. The original public review comment period was extended by the City to conclude on December 11, 2023. As such, the 61-day public review comment period exceeded the minimum 45-day review period as required by the CEQA Guidelines Section 15105(a) for Draft EIRs submitted to the State Clearinghouse for public review by state agencies. The Project's public review period also exceeded the maximum review period duration of 60 days per Section 15105(a), with such exceedances only permitted when there are unusual circumstances. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter for further discussion of the Project's Draft EIR comment period extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines.

Comment No. IND 21-2

Attachment

Response to Comment No. IND 21-2

The comment letter includes a copy of an extension request letter, which is included as Comment No.ORG 2A-3. Please refer to Response to Comment No. ORG 2A-3, which addresses the comments in the attached letter.

Comment Letter No. IND 22

Kim Cooper and Richard Schave
Received November 27, 2023

Comment No. IND 22-1

We have reviewed the Cultural Resources sections of the Draft EIR for the Fourth & Central Project (ENV-2021-4071- EIR) and note with concern the absence of any mention of the historic utility tunnel system through which cold water and other refrigerated products were delivered from the ice district to the hotel district to the west.

Architect George Wyman had a particular interest in the integration of industrial service tunnels into his buildings, having constructed a power plant serving the neighborhood in the basement of The Bradbury Building (1893).

We have spoken with city workers who have been inside the historic cold storage utility tunnel system in recent years, and believe that it still exists largely intact, and that one or more tunnels terminate at 4th and Central.

After the 1970s planning error of permitting the Bonaventure Hotel's footings to compromise the integrity of the red car subway tunnel, which might otherwise have been repurposed for transit or pedestrian use, we believe all surviving utility tunnels should be assessed for historic value and potential adaptive reuse. There is intense public interest in accessing historic service tunnels, and in other cities they have been made accessible as interpretive centers.

The ice house utility tunnel system's absence from the Draft EIR strongly suggests that more research and documentation is needed before major construction is approved on this site.

Response to Comment No. IND 22-1

As part of the Cultural Resources analysis conducted for the Draft EIR, a Historical Resources Technical Report and an Archaeological Resources Assessment Report were prepared for the Project. As part of these reports, extensive databases were reviewed to determine the presence of known historic resources within the Project Site. Both reports were included in Appendix C of the Draft EIR. The list of databases searched as part of the Historical Resources Technical Report was shown on pages 20 and 21 of the report. The list of databases searched as part of the Archaeological Resources Assessment report was shown on pages 25 through 33 of the report. Neither report identified the presence of a known tunnel system on or beneath the Project Site. The comment does not provide substantial evidence that such tunnels exist beneath the Project Site. Since there is no evidence that tunnels exist beneath the site, any analysis of potential project impacts to tunnels would be speculative, which is not required by CEQA pursuant to CEQA Guidelines Section 15145. As such, the Draft EIR appropriately did not address

the potential existence of the tunnel system. However, Mitigation Measures CUL-MM-9 through CUL-MM-12 are in place to address potential historic (archeological) resources if they are unearthed. As such, in the event that a tunnel or tunnel system is discovered during the Project's construction activities, the tunnel(s) shall be assessed for their historic value and potential adaptive reuse. Impacts related to archaeological resources during Project construction would be reduced to less than significant with implementation of Mitigation Measures CUL-MM-9 through CUL-MM-12. Monitoring of the Project Site during ground disturbing activities by a professional archaeologist shall result in the identification and assessment of significant or unique archaeological resources, including tunnels, as well as the implementation of appropriate measures in accordance with CEQA for avoidance of the resource. If the resource(s) cannot be avoided, measures for data recovery, assessment and analysis, curation, and commemoration shall be implemented, or adaptive reuse may be considered in the case of a tunnel.

Comment Letter No. IND 23

Mark Shinbane
Received November 28, 2023

Comment No. IND 23-1

Thank you for the opportunity to comment on the Fourth & Central project at 400 S. Central Ave. The Shinbane family has long history as a stakeholder in the Industrial District neighborhood dating back to 1961. During this time, Larry Rauch and Los Angeles Cold Storage have been our neighbors for this same duration.

My family and I are incredibly excited for this project to come to fruition. Our business, Fisherman's Outlet, located at 529 S. Central Ave. is located within a few hundred feet of the proposed development. With the thousands of people who will frequent this site on a regular basis we believe it will greatly contribute to the viability of our business allowing us to continue operating for years to come.

In particular, the proposed approximately 100,000 square feet of retail and restaurant space will provide many other individuals with the opportunity to start and/or expand an existing business. We wholeheartedly support development projects like these that afford others the same opportunity my family was fortunate enough to have, as small businesses are essential income and job providers to the Los Angeles landscape.

Finally, projects such as this will help to enhance the greater neighborhood both visually as well as functionally, drawing in visitors from throughout the region in addition to revitalizing and repurposing underutilized areas of greater downtown.

Thank you for hearing my comments at this time in the process. The Shinbane family is eager to see the project move forward.

Response to Comment No. IND 23-1

The commenter’s identification as a stakeholder in the Industrial District is acknowledged by the City. The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. This comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 24

Eddie Isaacs
Received November 29, 2023

Comment No. IND 24-1

Thank you for the opportunity to comment on the Fourth & Central project. I'm a nearby resident in Little Tokyo, just two blocks north from this proposed project at Second St and Central Ave. I have lived in my building for 16 and a half years and am proud to call Little Tokyo home. After taking some time to review the Draft Environmental Impact Report, I feel satisfied with its findings and excited for the next steps in this process.

This project represents a huge step in the right direction for this community in terms of making it more walkable. I regularly rely on public transit to get around and I walk all around the Arts District-Little Tokyo area. Replacing the existing cold storage warehouses with more community-serving uses is something I am all for. For example, the open space and greenery in the project is something I eagerly look forward to using. There is barely any open space in the area now, except for the Arts District Dog Park. The trees and landscaping that will be part of this project will make this community a much more enjoyable area to walk around in. The industrial activity and 18-wheelers driving around that are part of the landscape today do not make for a pedestrian-friendly environment.

Fourth & Central will also greatly benefit the Little Tokyo business community. The thousands of people who will live and work at this site will visit our shops and restaurants. This will help keep some of my favorite neighborhood spots open and busy. That kind of support is definitely needed in this post-pandemic era. The new Metro Regional Connector has certainly helped regain some of the community's former commercial activity and foot traffic, and this project will help even more.

Thank you for the chance to comment. As a local resident, I am excited about what this project can do for my community.

Response to Comment No. IND 24-1

The commenter’s identification as a resident in Little Tokyo is acknowledged by the City. The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 25

Matt Klein
Received December 1, 2023

Comment No. IND 25-1

Thank you for the opportunity to comment on the draft environmental impact report for the Fourth & Central project. My family and I are longtime Arts District stakeholders, and we are excited to see this development take a step forward in the process.

My family has been property owners since 1974, and I have long seen the potential of the Arts District to become one of the most dynamic communities in Los Angeles. In 2009, we developed the Factory Place Arts Complex, which transformed industrial warehouses into live/work lofts with retail storefronts and restaurants. Our space is now occupied by some of the most entrepreneurial and creative spirits in this city. Over the years, we have witnessed other property owners follow suit by repurposing their sites.

We are ecstatic that Larry Rauch and Continuum Partners are redeveloping a key property in this neighborhood. The Los Angeles Cold Storage facility sits at the nexus of three communities: the Arts District, Little Tokyo, and the Industrial District. This project would increase neighborhood connectivity, promote walkability, and encourage more connections to the new Metro Little Tokyo/Arts District station. The abundant open space and multi-structure design will foster a creative campus environment similar to what we strived to create with the Factory Arts Complex.

This is a vital project for the Arts District, and we cannot wait to see it built.

Response to Comment No. IND 25-1

The commenter's identification as a stakeholder in the Arts District is acknowledged by the City. The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 26

Nancy Kurihara-Johnson
Received December 5 and December 8, 2023

Comment No. IND 26-1

My name is Nancy Kurihara-Johnson and my place of worship is Higashi Honganji Buddhist Temple in Little Tokyo. I am concerned about the present and future betterment of the Little Tokyo community.

During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo. This project is a huge development covering 7.5 acres and encompassing several buildings of different heights, the tallest standing at forty-four stories!

My concern is quite personal. I continue the tradition of being an active member of Higashi Honganji Buddhist Temple which was the practice of my parents since before their incarceration in Heart Mountain, WY, during WWII. My parents contributed toward building the current temple on 3rd and Central in 1976. My father was involved with the Tokyo Towers residential facility on 3rd Street and was a founding member of the Southern California Gardeners' Federation on San Pedro near 3rd Street.

I am very concerned about the size and heights of these buildings in the Project which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will conspicuously change the character of our neighborhood and overshadow our Higashi Honganji Buddhist Temple located at 505 E. Third Street which is also a cultural and historic resource in the City of Los Angeles.

Response to Comment No. IND 26-1

The commenter’s identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment states that the Project is out scale for the immediate surroundings and will alter the existing historic Little Tokyo community. Refer to Response to Comment No. ORG 1B-13, which discusses the Project’s size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project’s compatibility with the Little Tokyo historic neighborhood.

In addition, the commenter states the Project would overshadow the Higashi Honganji Buddhist Temple. Refer to Response No. ORG 2B-5, which addresses historic resources impacts to the Higashi Honganji Buddhist Temple. As discussed therein, the Higashi Honganji Buddhist Temple is located approximately 785 feet from the Project Site. Consistent with CEQA Guidelines, it is outside of the Study Area for the Project as there are no reasonably foreseeable potential impacts that would materially impair the Higashi Honganji Buddhist Temple such that it would no longer convey its historical significance.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR. Within Section III *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, relevant figures from the Draft EIR have also been revised to illustrate the Project design modifications summarized above.

Comment No. IND 26-2

Additionally I am concerned about the serious construction impacts from the proposed Project, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially people living, working, and visiting Little Tokyo.

These significant impacts include:

* Construction noise and debris-dust-pollution emissions

* Increased traffic and air pollution along Alameda, Central, 3rd and 4th Streets

* Disruption to local businesses, especially small, family owned legacy businesses

* Disruption to nearby residents, child care centers, and places of worship

* Disruption to the historical and cultural Little Tokyo

* Cause possible damage to unrecognized underground structures/weaknesses

Response to Comment No. IND 26-2

This comment raises general concerns from construction-related impacts related to air quality impacts, traffic impacts, noise/vibration impacts, as well as disruptions to nearby businesses, residents, child care centers, places of worship, and the historical and cultural Little Tokyo.

The Draft EIR fully evaluated air quality impacts in Section IV.A, *Air Quality*, noise impacts in Section IV.G, *Noise*, and transportation-related impacts in Section IV.J, *Transportation*, of the Draft EIR. The Project would result in short-term significant and unavoidable impacts related to construction-related air quality emissions, on-site construction noise, off-site traffic noise, and groundborne vibration (structural damage). These significant and unavoidable impacts are also summarized in the Draft EIR's Executive Summary.

In addition, refer to Appendix C and Appendix E of this Final EIR for air quality/ greenhouse gas emissions and noise technical data, respectively, associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate that the Project with design modifications would not result in any significant new or substantially increased impacts.

With regard to construction traffic, the City, through the LADOT Transportation Assessment Guidelines (TAG), continues to require that transportation assessments (TAs) analyze various non-CEQA transportation topics, such as pedestrian, bicycle and transit access, intersection operations, project access, construction period traffic effects, and residential street cut-through effects. The City's TAG also establishes various criteria for these analyses where corrective actions may be appropriate to address non-CEQA adverse effects. These issues were discussed in the non-CEQA portion (Chapter 5) of the TA prepared for the Project. The TA for the Project was included in Appendix J of the Draft EIR. The results of these analyses of non-CEQA topics and the proposed corrective actions identified in the TA would be addressed through potential Project conditions of approval. Refer to Response to Comment No. IND 4A-2 for additional information on the Project's non-CEQA analysis included in the Project's TA (Appendix J of the Draft EIR). In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications. Applicable updates to the CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate that the Project with design modifications would not result in any significant new or substantially increased impacts.

For additional discussion of the Project's construction-related impacts, refer to Response to Comment Nos. ORG 2B-29 to ORG 2B-32.

This comment also raises concerns regarding displacement, which are similarly expressed in Comment No. ORG 1B-10. Refer to Response to Comment No. ORG 1B-10, which addresses this concern.

The comment also suggests there would be significant impacts to the historical Little Tokyo. Refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As concluded in Section VI, *Other CEQA Considerations*, of the Draft EIR, the Project is being proposed, notwithstanding the Project's short-term significant and unavoidable construction-related air quality impacts because (1) the Project would support a considerable number of regional and community land use and mobility objectives, including those that promote mixed-use, infill development within a Transit Priority Area (TPA); (2) the Project would provide needed housing to serve the local area and the region; and (3) the Project would provide economic benefits to the Central City

community. In addition, as a result of the conclusions of the analysis contained within the Draft EIR, a statement of overriding considerations supported by substantial evidence will be prepared and reviewed by the decision-maker in accordance with the State CEQA Guidelines Section 15093 when making a determination on the Project.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 26-3

My name is Nancy Kurihara-Johnson, a member of Higashi Honganji Buddhist Temple at 3rd and Central in Little Tokyo.

I am writing again in response to worrying information in the DEIR with potential for the following dire impacts upon our stakeholders:

* Noise, pollution, toxicity, heavy-duty traffic resulting from 651,000 CY of grading at the Project sites. Plus, undermining of stability and safety from depths of below ground surface excavations.

Response to Comment No. IND 26-3

This comment reiterates construction-related concerns raised in Comment No. IND 26-2. Refer to Response to Comment No. IND 26-2, which addresses these concerns. Also, with regard to stability and safety from depths of below ground surface excavations, the Project's Initial Study, included in Appendix A of the Draft EIR, evaluated site-specific impacts related to geology and soils. As evaluated therein, with compliance to existing building codes and adherence to site-specific design recommendations contained in the final geotechnical reports prepared for the Project, Project impacts associated with geologic stability and safety hazards would be less than significant.

Comment No. IND 26-4

* Unspecified hours of construction Monday through Saturday. Will stakeholders be notified of the hours and if hours are changed or extended?

Response to Comment No. IND 26-4

This comment asks about the Project's construction hours and if stakeholders would be notified of the construction hours prior to construction. The Project's construction hours and impacts associated with any construction during extended are address in Response to Comment No. ORG 2B-32. Refer to Response to Comment No. ORG 2B-32 for a discussion of the Project's construction hours as evaluated in the Draft EIR. As discussed therein, Project's construction impacts were analyzed in Sections IV.A, *Air Quality*, and

IV.G, *Noise,* of the Draft EIR respectively. All Project noticing would occur in accordance with City requirements, including compliance with the allowable, hours of construction as established in the LAMC, as is typical for construction projects throughout the City.

Comment No. IND 26-5

* Health and safety related to the tremendous amount of dirt to be excavated: when will that occur and during what hours?

* Health and safety if the historic building at 4th and Central is reused or demolished. What plans are in place for asbestos and lead paint removal? Will our temple and other stakeholders be notified in a timely manner?

Response to Comment No. IND 26-5

The comment expresses concerns regarding health and safety related to excavation activities. The Draft EIR addressed air quality impacts in Section IV.A, *Air Quality*, with supporting data provided in Appendix B, Air Quality/Greenhouse Gas Emissions Technical Documentation, of the Draft EIR. As analyzed therein, localized construction impacts regarding the exposure of substantial pollutant concentrations on sensitive receptors during construction would be reduced to less than significant with the implementation of Mitigation Measure AQ-MM-1 as described on pages IV.A-63 to IV.A-64. Excavation activities would occur during the permitted construction hours allowed by the LAMC. See Response to Comment No. ORG 2B-32 for further discussion of the Project's construction hours.

In addition, refer to Appendix C of this Final EIR for air quality and greenhouse gas emissions technical data associated with the Project with design modifications. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

This comment also expresses general concerns regarding asbestos and lead-based paint removal. Impacts regarding hazardous materials, including asbestos and lead-based paint, were determined to be less than significant as evaluated in the Project's Initial Study, which is included in Appendix A of the Draft EIR. As discussed on pages 83 and 84 on the Initial Study, asbestos and lead-based paint removal activities are highly-regulated construction activities. Adherence to standard construction practices and compliance with existing regulations would ensure the Project construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As removal of these materials would be controlled on-site in accordance with applicable regulations, no specific noticing is required for such activities.

In addition, a health risk assessment was prepared for the Project with design modifications, which is included in Appendix B, Health Risk Assessment, of this Final EIR. As discussed in Response to Comment Nos. AG 4B-3 to AG 4B-5, and as discussed in the health risk assessment, the Project would not result in health risks above acceptable regulatory South Coast Air Quality Management District (SCAQMD) thresholds.

Comment Letter No. IND 27

Lisa Spencer
1819 W. Charlie Sifford Drive
Los Angeles, CA 90047
Received December 7, 2023

Comment No. IND 27-1

This comment letter includes copies of the Draft EIR's Notice of Availability from the Los Angeles Times, and other miscellaneous copies of portions of LA Times articles. Please refer to Appendix A of the Draft EIR for copies of the provided articles.

Response to Comment No. IND 27-1

These articles do not include comments that raise any issues with respect to the content or adequacy of the Draft EIR. Thus, no further response is necessary.

Comment Letter No. IND 28

Sara Daleiden
Received December 7, 2023

Comment No. IND 28-1

My name is Sara Daleiden and for two decades I have lived and worked at 9th+Broadway in Downtown Los Angeles with my small creative business called Sara Daleiden Consulting. I also am a leader with the Skid Row Now and 2040 Coalition and I frequently engage with local small businesses in Little Tokyo. I am concerned with the present and future betterment of the Skid Row and Little Tokyo communities, as well as the health of Downtown Los Angeles overall. I am writing concerning the 4th and Central Project located south of and adjacent to Skid Row and Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

sm [sic]

I am extremely concerned about the size and heights of these buildings, which are completely out of scale with development in Skid Row and Little Tokyo and the existing, surrounding low-rise development. The buildings will change the character of our neighborhood and overshadow our cultural and historic resources.

Response to Comment No. IND 28-1

The commenter's identification as a stakeholder in the Little Tokyo and Skid Row communities is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Skid Row and Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 28-2

I understand that there will be construction impacts from the DEIR, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshipping in, and visiting Skid Row and Little Tokyo.

I have significant concerns about the 4th & Central project generally as well as the following unmitigated impacts which are sufficiently NOT addressed in the draft Environmental Impact Report.

I am concerned about:

- Construction Impacts on the neighborhoods
- Undeniable impact on the adjacent historic cultural neighborhoods of Skid Row and Little Tokyo
- The overwhelming height of the 40+ story tower
- Lack of affordable housing for a range of low income levels
- Pedestrian and bike safety
- Connection and consistency of this project with the local communities
- Impact on nearby small businesses
- Impact on adjacent residents

In addition to the above, I seek a neighbor engagement process learning from what we have with the DTLA 2040 community plan process together.

Furthermore, I am in support of similar advocacy letters by Skid Row Now and 2040 and Little Tokyo Community Council due to be submitted to you.

Response to Comment No. IND 28-2

This commenter raises general concerns for a variety of topics for which they describe as unmitigated impacts. The Draft EIR thoroughly analyzed the Project's potential for construction-related and operational impacts. The Project's significant and unavoidable impacts identified in the Draft EIR include short-term construction-related air quality emissions, direct historic resource impact to the on-site Los Angeles Cold Storage (LACS) Building, on-site construction noise, off-site construction traffic noise, and construction-related groundborne vibration (structural damage). These significant and unavoidable impacts are also summarized in the Draft EIR's Executive Summary.

This comment's list of concerns are similarly listed in Comment Nos. ORG 1B-5 to ORG 1B-11. Refer to Response to Comment Nos. ORG 1B-5 to ORG 1B-11, which address these concerns. Also, refer to Response to Comment Nos. ORG 2B-15, ORG 2B-16, and ORG 2B-22, which address pedestrian and bicycle safety.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is

necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR. As shown therein, modifications have been made to reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories while increasing the height of Building 6 (on the South Site) from six stories to 26 stories, and to reduce the residential density/unit count in Building 2 from 449 units to 335 units, a reduction of 114 units. Additionally, the hotel component (68 rooms) in Building 6 has been removed. With the conversion of the 68 hotel rooms to residential units, as well as the transfer of 114 units from Building 2 to Building 6, the residential unit count in Building 6 has increased from 68 units to 250 units. Overall, the Project's unit count has been increased from 1,521 units to 1,589 units. Also, the amount of restaurant and retail space within Building 1 has been increased from 16,378 square feet to 61,038 square feet. As such, the Project's overall amount of restaurant/retail square footage has been increased from 101,088 square feet to 145,748 square feet.[40] Within Building 1, the 44,660 square feet of residential floor area (which was previously designated for residential amenity space) would be removed to accommodate the increase in restaurant and retail square footage. With these modifications, the Project's overall floor area (2,318,534 square feet) would remain the same as analyzed in the Draft EIR. The Project's total parking count has also been reduced from 2,475 spaces to 2,444 spaces. Within Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, relevant figures from the Draft EIR have also been revised to illustrate the Project design modifications summarized above.

This comment also requests a neighbor engagement process similar to the outreach conducted for the DTLA 2040 Community Plan. Refer to Response to Comment No. ORG 12-5, which addresses this comment. This comment also makes reference of support for letters provided by Skid Row Now and 2040 Coalition and LTCC. These letters and responses to the comments provided therein are provided as Comment Letters ORG 3 and ORG 2B, respectively. As this portion of the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. However, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

40 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 Project's retail/restaurant uses, the environmental analyses included in Chapter 4, *Environmental Impact Analysis*, of the Draft EIR, evaluates a total of 158,225 square feet of restaurant/retail uses. It is assumed that there would be 67,595 square feet of retail uses and 90,630 square feet of restaurant uses (indoor and outdoor uses combined).

Comment Letter No. IND 29

Dina Furumoto
Received December 7, 2023

Comment No. IND 29-1

My name is Dina Furumoto, and I work in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been a Little Tokyo community member all my life and grew up visiting Little Tokyo. I have seen it change and become a victim of gentrification.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations, and religious institutions.

Response to Comment No. IND 29-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

This comment also raises concerns regarding gentrification, which is similarly expressed in Comment No. ORG 1B-11. Refer to Response to Comment No. ORG 1B-11, which addresses these concern.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 29-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the doors this will open for futher [sic] displacement and gentrification. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 29-2

This comment raises a list of concerns included in Comment No. IND 26-2 and expresses safety concerns for pedestrians and cyclists. Refer to Response to Comment Nos. IND 26-2, as well as Response to Comment Nos. ORG 2B-15, ORG 2B-16, and ORG 2B-22, which address pedestrian and bicycle safety.

This comment also raises concerns regarding displacement and gentrification, which are similarly expressed in Comment Nos. ORG 1B-10 and 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment also makes reference of support for a letter provided by LTCC. This letter and responses to the comments provided therein are provided as Comment Letter ORG 2B and Response to Comment Nos. ORG 2B-1 through ORG 2B-42, respectively. As this portion of the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. However, the comment is

noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment Letter No. IND 30

Celeste Shimoura Goedert
Received December 7, 2023

Comment No. IND 30-1

My name is Celeste and I work at the JACCC in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been visiting Little Tokyo intermittently for the past 5 years, and now I have the pleasure of working here.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 30-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 30-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions

- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 30-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 31

Justin Kawaguchi
Received December 8, 2023

Comment No. IND 31-1

My name is Justin Kawaguchi, and I am a community member in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been visiting, shopping, and volunteering in the Little Tokyo community for my entire life. My great great grandparents immigrated to Los Angeles in the early 1900s and chose to settle in the downtown area. We have stayed close to DTLA because of the Little Tokyo community. During my time in college at USC and now as a young professional in Los Angeles, it is very important for me to have a strong and protected cultural community where I feel that my identity and family's history is honored.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 31-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 31-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the rapid gentrification of the region, displacing legacy businesses and pushing out small businesses in the interest of aggressive landlords and multinational corporation encroachment. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 31-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments..

This comment also raises concerns regarding displacement and gentrification, which are similarly expressed in Comment Nos. ORG 1B-10 and 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 32

Scott Oshima
Received December 11, 2023

Comment No. IND 32-1

My name is Scott Oshima and I am a former Board Member of the Little Tokyo Community Council and current member of Sustainable Little Tokyo. I am deeply concerned about the 4th and Central Project located adjacent to Little Tokyo. In addition to my support for the LTCC letter submitted to the City, I wanted to share my own concerns.

My family has been strongly involved in our historic Japantown since the 1920s, and I have also worked and served as the director of Sustainable Little Tokyo (SLT) from 2027-2022. Our SLT Community Vision identifies neighborhood priorities for sustaining our history, culture, and community–all of which would be negatively impacted by this project.

I am very concerned about the FAR of these buildings, which are completely out of scale with our human-scale and village zoned neighborhood. The proposed buildings will change the character of our neighborhood and overshadow the nearby housing, businesses, organizations, temples, and churches.

Response to Comment No. IND 32-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 32-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially people living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the negative impacts and lack of benefits for our unhoused residents in Skid Row and the surrounding area.

Response to Comment No. IND 32-2

This comment includes the same list of construction-related concerns included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these concerns.

This comment also raises concerns regarding the lack of benefits for unhoused residents in Skid Row and the surrounding area, which are similarly expressed in Comment No. ORG 1B-12. Refer to Response to Comment No. ORG 1B-12, which addresses these concerns.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 33

David Ikeda
Received December 8, 2023

Comment No. IND 33-1

My name is David Ikeda, and my wife Kathleen and I attend the (Higashi Honganji Buddhist Temple) in Little Tokyo. As stakeholders, we continue to support the present and future betterment of the Little Tokyo community. During this public comment time, I am writing about our concerns about the 4th and Central Project whose proposed location is adjacent to Little Tokyo. As proposed this is a comparatively large development for the area . We, [sic] understand that it covers over 7.5 acres and includes several buildings of different heights, with the tallest standing at forty-four stories.

My wife and I have been active members of Higashi for over 35 years. I have served on the Board of Directors in various capacities for 30 years. My wife has been involved in educational and religious programming for over 30 years. We have already seen the changes in LittleTokyo [sic] and the constuction [sic] impacts on the community over all those years. Changing times have also brought with it a concomitant increase in crime and traffic to the area. Many auto burglaries occur on a daily basis on the streets surronding [sic] our Temple due to the lack of public parking structures. . [sic] My father was in business in Little Tokyo for many years and my wife's family continues to do business there for over 120 years. It is a legacy business that will likelly [sic] be impacted by this development. Many of the Little Tokyo businesses are concerned about these critical issues [sic]

We are also very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the Higashi Honganji Buddhist Temple, located at 505 E. Third Street. Our Temple is also a cultural and historic landmark in the City of Los Angeles. This year we are celebrating our 120th year in Los Angeles and 50 years at our present location. [sic] (Higashi Temples were first established in the 1600's in Japan. Our traditional roof-line was built by artisans from Japan) [sic]

Response to Comment No. IND 33-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. In addition, please refer to Section III*, Revisions, Clarifications and*

Corrections to the Draft EIR, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

This comment also expresses concern with crime in the Project Area. As discussed on page IV.2-14 in Section IV.I.2, *Public Services – Police Protection*, of the Draft EIR, the Project will incorporate a security program to ensure the safety of residents, employees, and visitors as part of Project Design Feature POL-PDF-2. Specifically, the security measures outlined in Project Design Feature POL-PDF-2 include a security program to provide security for the Project's ground level open space areas, including publicly-accessible areas. Furthermore, the addition of the Project would provide more "eyes and ears" on the ground from on-site residents, visitors, and employees, making the area safer for residents and pedestrians in the area.

The commenter also raises concerns about traffic. The Project's CEQA transportation impacts were evaluated in Section IV.J, *Transportation*, of the Draft EIR, as required by CEQA and the City of Los Angeles Department of Transportation (LADOT). The Project's impacts from vehicle trips generated by the Project on intersection operations in the Project vicinity were included in Chapter 5, *Non-CEQA Transportation Analysis*, of the Project's Transportation Assessment (TA), included as Appendix J, of the Draft EIR. The results of the analyses of non-CEQA topics and the proposed corrective actions identified in the TA would be addressed through potential Project conditions of approval. Refer to response to Comment No. IND 4A-2 for additional discussion of the Project's CEQA impacts as evaluated in Section IV.J, *Transportation*, of the Draft EIR, and the non-CEQA impacts analyzed in Chapter 5 of the TA.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications. Applicable updates to the CEQA transportation analysis for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 33-2

Additionally, we are concerned about construction impacts from the proposed Project, including noise, traffic, and air quality issues, which will likely be felt by all nearby stakeholders, especially those living, working, worshipping, and visiting Little Tokyo.

These significant impacts include:

*Construction along with noise and debris/dust/pollution emissions

*Traffic-will have a significant impact on traffic flow and air pollution emissions along, Alameda, Central, Aiso 1st 2nd , [sic] 3rd and 4th Streets; The noise and construction dust will impact our members and the elderly residents of the area who live in a number of subsidized senior housing units in this area.

*Disruptions to local businesses, especially small, family-owned and legacy businesses. Parking as mentioned above is alreay [sic] at a premium in Little Tokyo.

*Disruptions to nearby residents, child care centers, and places of worship. Our pre-school children have a playground situated on the corner of Central and Third St. We are already faced with significant dust and exhaust fumes because of our urban location. Now our students will be subjected to construction noise, construction dust and noise pollution. We believe that the above issues will have an impact on our pre-school enrollment. Since we are already situated on a one- way street our staff and members coming from various suburbs will likley [sic] be impacted in terms of attending meetings, services, funerals and special events.

Submitted as our public comment on the DEIR, your reference (ENV-2021-4071-EIR)

Response to Comment No. IND 33-2

This comment raises a list of concerns included in Comment No. IND 26-2. Refer to Response to Comment No. IND 26-2, which addresses these concerns.

The comment also expresses concerns about pre-school enrollment at a children's pre-school located at the corner of 3rd Street and Central Avenue. Project construction vehicles would not utilize a route that passes in front of the pre-school. Also, the Project would prepare and implement a Construction Traffic Management Plan (Project Design Feature TRAF-PDF-1) subject to review and approval by LADOT that will be incorporated into the Project. The Construction Traffic Management Plan will include elements, such as street closure information, detour plans, haul routes, and staging plans, and will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The various safety features that will be implemented during Project construction would also reduce the potential for incidents that would require police responses.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 34

Yukio Kawaratani
Received December 9, 2023

Comment No. IND 34-1

I am Yukio Kawaratani, a member of the Little Tokyo Community Council and Little Tokyo Historical Society for over a dozen years. I am also a volunteer planning and design consultant for the Little Tokyo Community Council. I am a retired city planner, formerly with the Community Redevelopment Agency of the City of Los Angeles, working on the Bunker Hill, Central Business District and Little Tokyo Redevelopment Projects. Attached are my comments on the 4th and Central project and DEIR.

Response to Comment No. IND 34-1

This comment introduces the commenter and the comments provided below. The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. As the comment does address the adequacy or content of the Draft EIR, no further response is necessary.

Comment No. IND 34-2

i [sic] would like to see housing constructed nearby, as it will add visitor activity to the many uses in Little Tokyo. However, on behalf of the Litle [sic] Tokyo community that will be environmentally adversely affected, I oppose the proposed extra high density of 7.13 to 1 floor area ratio (FAR) and nearly three million square feet of floor area proposed in the project. Litle [sic] Tokyo was developed under redevelopment with a 3:1 FAR limit and the Central City General Plan and existing zoning for the project site and surrounding area provide for a 3:1 FAR. To achieve more needed housing in the Downtown area, a little higher FAR density is warranted, but the 7.13 FAR is excessive for this area. The 10 high-rise buildings and especially the 44 stories high residential building are completely out of scale with development in Litle [sic] Tokyo and the existing, surrounding low rise development that will be slow to change for many years into the future. The proposed high-rise development will stand out like a sore thumb. If constructed densely as proposed, it would also spike adjacent land values and make it more difficult to assemble parcels of land for more housing.

Response to Comment No. IND 34-2

This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the

concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 34-3

I also strongly question the over 400,000 square feet of office floor area proposed in three high-rise buildings. Even being adjacent to the Civic Center, there has been no market for a new office building in Litle [sic] Tokyo for several decades. The office buildings proposed would be in a surrounding environment of primarily 1 to 3 story industrial buildings and some commercial uses. A few blocks to the west is Skid Row with its homeless population, SRO hotels and social services that separates the project from the more central parts of Downtown that are already hurting for office tenants. The major spot changes to Regional Commercial in the General Plan and Zoning will be highly difficult to justify and the City to ever approve.

Central Avenue that terminates at 1st Street has very limited vehicular traffic and Alameda Street is an industrial street with much truck traffic. Pedestrian traffic is non-existent now and into the foreseeable future, so the over 100,000 square feet of restaurant/retail space is excessive. The uses will struggle to gain off-site patronage. Subterranean parking is an additional deterrent for outsiders.

Response to Comment No. IND 34-3

This comment questions the need for the office and restaurant/retail uses proposed by the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 34-4

In summary, I recommend an all residential development with appropriate restaurant/retail space and with a slightly increased and not overly high density. Construction of such a development would be considerably expedited and a better fit with its surrounding environment. Primarily because it would not require the significant and major General Plan, Zoning and other public approvals required by the proposed project that could take years of time to resolve. Time can be a killer of projects and we want this project to be built.

These are my comments on the proposed 4th & Central project covered by the Draft EIR, on behalf of the Litle [sic] Tokyo community, where I am a volunteer planning and design consultant. I am a retired and former principle city planner with the Community

Redevelopment Agency of the City of Los Angeles working on the redevelopment of the Bunker Hill and Central Business District Redevelopment Projects for 31 years.

Response to Comment No. IND 34-4

This comment recommends an all-residential Project development with restaurant/retail space and with a slightly increased density. The commenter states such an alternative development would have fewer approvals thereby expediting the approval process. The Draft EIR did assess a "Single-Use (Non-Employment Center) Alternative in Chapter V, *Alternatives*, of the Draft EIR. As discussed therein, single-use alternatives, such as all-residential development or all-commercial (retail) uses that would not be large employment centers do not include a mix of land uses that reduce vehicle miles traveled (VMT) as encouraged by State and local regulations; and, thus, do not contribute to the reduction of greenhouse gas emissions. Therefore, single-use alternatives were not further considered or evaluated as potential alternatives to the Project.

This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. The comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 35

Avalon Igawa
Received December 9, 2023

Comment No. IND 35-1

My name is Avalon Igawa, and I work at Little Toky [sic] Service Center and organize with Nikkei Progressives in Little Tokyo, and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been coming to Little Tokyo since I was a child when I would come to visit my grandparents in Los Angeles. It became a more important part of my life during undergrad at USC as a connection to my Japanese-American community and culture. For the last few years, Nikkei Progressives has become a political home where I often organize around issues in Little Tokyo. I had the privilege of starting to work in Little Tokyo this past year as well and now come into the area often to work, eat, shop, and organize.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations, and religious institutions.

Response to Comment No. IND 35-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 35-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the values of the community being prioritized. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 35-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments..

This comment also raises concerns about the values of the community being prioritized. Refer to Response to Comment No. ORG 1B-12, which addresses the community benefits of the Project.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 36

Alex Kanegawa
Received December 9, 2023

Comment No. IND 36-1

My name is Alex Kanegawa, and I work with Nikkei Progressives in Little Tokyo as a highly engaged community stakeholder in the neighborhood. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I've lived in Los Angeles my whole life and the past five generations of my family have called this place home–throughout segregation, following internment and beyond.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions. They add to the feeling of encroachment and shrinkage that diminishes the area's character as a thriving, 130+ year old site of spiritual and community significance.

Response to Comment No. IND 36-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 36-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about how this new development impacts the rapid gentrification of this wing of downtown and takes into account its proximity to its neighbors in Skid Row. I understand that affordable and/or workforce housing are part of the plan, but I am concerned that it will have a larger impact on the unhoused populations nearby and further contribute to negative outcomes including criminalization and displacement. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 36-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also raises concerns regarding displacement and gentrification, which are similarly expressed in Comment Nos. ORG 1B-10 and ORG 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns. As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 37

Pranay Reddy
Received December 9, 2023

Comment No. IND 37-1

My name is Pranay Reddy, and I work in Little Tokyo with the nonprofit arts space, LA Artcore. I am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is an extensive development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have worked in this community for 17 years and I have continually seen how opportunistic developments contribute to a segregated community fabric in both economic and cultural terms.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations, and religious institutions.

Response to Comment No. IND 37-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 37-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the ongoing gentrification of downtown which has continued to displace longtime residents. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 37-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also raises concerns regarding displacement and gentrification, which are similarly expressed in Comment Nos. ORG 1B-10 and 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns. As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 38

Alex Hager
Received December 10, 2023

Comment No. IND 38-1

Hello I live in Little Tokyo/Arts District 90012 and I am in full support of this project at 4th and Central.

The developer is doing a great service to Little Tokyo by removing a cold storage facility that does nothing for Little Tokyo into one where people can live and exist.

The local community will benefit from less truck traffic as well. We are in a housing crisis. Stop with the BS and get it built.

Response to Comment No. IND 38-1

The commenter's identification as a resident in Little Tokyo/Arts District is acknowledged by the City. The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 39

Junko Yamauchi
Received December 10, 2023

Comment No. IND 39-1

My name is Junko Yamauchi, and I worship at Nishi Honganji Temple in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I've been worshiping at Nishi Honganji Temple over year, and I've been visiting and seeing the changes Little Tokyo area last 20 years.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 39-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 39-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about there will be more projects will follow your project; therefore, these projects will disrupt more to the historic cultural Little Tokyo neighborhood, local family owned business, and safety for children learning at temples. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 39-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

The comment also expresses general concerns about disruptions to the Little Tokyo neighborhood, local family owned business, and safety caused by other projects that may follow this Project. As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 40

Mariko Rooks
Received December 10, 2023

Comment No. IND 40-1

My name is Marik Rooks, and I work for Nikkei Progressives, a 501(c)3 organization based out of the Far East Lounge in Little Tokyo. I am writing because I am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning th[e] 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

As a longtime Japanese American community member who has attended preschool and summer camp in Little Tokyo and continues to regularly visit the neighborhood to partake in cultural dance classes, community events, and complete tasks for my job with Nikkei Progressives, I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low- rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 40-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 40-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the threat to community-owned businesses that is created by this new industrial development, along with the long-term environmental impacts of such a large structure with water, power, and waste needs. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 40-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also raises concerns regarding displacement of businesses, which are similarly expressed in Comment No. ORG 1B-10. Refer to Response to Comment No. ORG 1B-10, which addresses this concern.

The commenter also expresses concerns regarding the ability of utilities to accommodate the Project, such as water, power, and waste needs. The Draft EIR fully evaluated impacts to utilities and service systems in Section IV.L.1 to IV.L.4, in Section IV, *Environmental Impact Analysis*, of the Draft EIR, including impacts to water supply and infrastructure, wastewater, solid waste, and electric power and natural gas infrastructure. As analyzed therein, impacts would all be less than significant, including impacts to water infrastructure after implementation of the required Mitigation Measure PS-MM-1, whereby the Project would be responsible for utility updates.

In addition, refer to Appendix G of this Final EIR for a discussion of utility impacts related to the Project with design modifications. Applicable updates to the CEQA utility analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 41

Dante Scott
Received December 10, 2023

Comment No. IND 41-1

I am writing to share my feedback on the proposed development at 400 S Central Ave in the Arts District.

This is a massive project with significant potential community benefits for this part of Downtown LA. 1,521 units of new housing, 100k+ square feet of restaurant and retail, and more across ten new buildings will be a game changer for this community.

I was extremely excited when I saw this project on Urbanize LA back in 2021. Downtown LA and the Arts District seemed to be on such a promising path with the Regional Connector, Sixth Street Bridge, and DTLA 2040.

2 years had passed, and I hadn't heard much on this project recently.

The city shouldn't delay any further. We cannot keep letting years pass by.

The longer this property is used as cold storage warehouses, the longer the Arts District and Little Tokyo are deprived of community benefits.

Response to Comment No. IND 41-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 42

Maria Ahverdyan
Received December 10, 2023

Comment No. IND 42-1

My name is Maria Ahverdyan and I live in Little Tokyo and am concerned with the present and future betterment of the community. I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 42-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 42-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets

- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the displacement of many of my neighbors as our community continues to change. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 42-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also raises concerns regarding displacement, which is similarly expressed in Comment Nos. ORG 1B-10. Refer to Response to Comment No. ORG 1B-10, which addresses this concern.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 43

Irene Ota
Received December 10, 2023

Comment No. IND 43-1

As a third generation Japanese American, I have shopped at the markets and stores in Little Tokyo, eaten in the restaurants in the area, and worshipped at Higashi Honganji Temple, located at Third Street and Central Ave. since I was very young, I am very concerned about the impact the Fourth and Central Project will have on the surrounding neighborhoods.

The DEIR describes Little Tokyo as a place where numerous former warehouse structures are being converted into artists' workshops and a neighborhood-serving retail and commercial uses. That is false! Little Tokyo is a thriving neighborhood with many restaurants, small businesses, a museum, arts/cultural institutions, churches and temples, and apartments/condos. Several of these businesses and my temple have existed here for over 100 years. Little Tokyo has been a cultural and historic hub for several generations, primarily low density in character. How will the Project, with its tall buildings and huge sprawl over many blocks, be integrated into the Little Tokyo District?

Response to Comment No. IND 43-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. The comment makes reference to a description of Little Tokyo in a subsection named, *Surrounding Land Uses*, in Chapter II, *Project Description*, of the Draft EIR. This issue was also raised in Comment No. IND 4C-1. Refer to Response to Comment No. 4C-1, which addresses this comment. See Response to Comment Nos. ORG 2B-5 and ORG 2B-6, which address the Project's historic impacts on Little Tokyo and compatibility with the Little Tokyo historic neighborhood. Refer also to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity.

Comment No. IND 43-2

I am a board member of Higashi Honganji Temple, and is intrinsically involved in its affairs, including the Lumbini Child Development Center, housed within the temple. The children, teachers, staff, ministers, and temple members will certainly be affected by the increased traffic, noise, air pollution, and disruptions, as well as nearby residents, business owners/employees, and visitors.

The DEIR states that construction hours would occur Monday through Saturday, and that hours of operation could be extended beyond those allowable as set forth in the LAMC. There would also be excavations of depths up to about 57 feet. So what happens to all

that dirt? What safeguards are in place for asbestos, and lead paint removal? The long hours of construction are also unacceptable.

Response to Comment No. IND 43-2

This comment expresses a general concern for the children, teachers, staff, ministers, and members of the Higashi Honganji Temple, the Lumbini Child Development Center, and other local community members, who the commenter states will be affected by the increased traffic, noise, air pollution, and disruptions. The comment does not present any substantial evidence to support a contention that the Project would significantly impact traffic, noise or air pollution or with respect to the content and adequacy of the Draft EIR and instead raises questions which are addressed in the Draft EIR.

With regard to the question regarding disposal of excavated dirt, as explained on pages V.L.3-13 through IV.L.3-15 in Section IV.L.3, *Utilities and Services Systems – Solid Waste*, of the Draft EIR, the soil and demolition debris would be hauled off-site to approved and appropriate regional disposal sites. As further discussed therein, the Azusa Land Reclamation Facility has the capacity to receive the Project's construction waste as the Project's estimated total solid waste disposal quantities during construction represents only approximately 0.38 percent of the estimated remaining capacity at the Facility.

This comment also expresses general concerns regarding asbestos and lead based paint removal, which were similarly raised Comment No. IND 4C-10. Refer to Response to Comment No. IND 4C-10, which addresses these issues.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 43-3

With such a massive construction project, what plans are in place to house the homeless encampments that this will displace? If there are no plans, the homeless will navigate their way further into Little Tokyo. We are already dealing daily with the encampments on Third Street and Crocker Street, directly across the street from Higashi Honganji, frequently cleaning up debris, drugs and hazardous material, and human feces from the sidewalks and within our temple grounds. Those problems would multiply extensively if the displaced homeless population is not given adequate resources.

Response to Comment No. IND 43-3

The comment expresses concern about the potential for the Project to displace homeless people to move into Little Tokyo. As stated in CEQA Guidelines Section 15131, economic or social effects of a project shall not be treated as significant effects on the environment.

As such, this topic was not evaluated in the Draft EIR, and no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 43-4

In summary, the significant impacts include:

- construction along with noise and air pollution
- increased traffic, causing safety issues
- disruptions to local businesses, especially small, family-owned and legacy businesses
- disruptions to nearby residents, child care centers, and places of worship
- disruptions to the historic and cultural Little Tokyo district
- displacement of homeless encampments, which may have them move northward into Little Tokyo

Thank you for your consideration in these matters.

Response to Comment No. IND 43-4

This comment raises a list of concerns included in Comment No. IND 26-2 and expresses safety concerns for pedestrians and cyclists. Refer to Response to Comment Nos. IND 26-2, as well as Response to Comment Nos. ORG 2B-15, ORG 2B-16, and ORG 2B-22, which address pedestrian and bicycle safety.

The comment also expresses concerns about displacement of homeless encampments, which is addressed in Response to Comment No. IND 43-3.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 44

Rickie Dean
Received December 11, 2023

Comment No. IND 44-1

This below comments are from a form letter, where the commenter has filled in their name and location where they live/work/worship.

My name is Rickie Dean and I live/work/worship at Koyasan Temple in Little Tokyo and am concerned with the present and future of the Little Tokyo community specifically the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings, with the tallest standing at forty-four stories.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 44-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 44-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

Construction along with noise and debris/dust/pollution emissions

Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets

Safety concerns for pedestrians and cyclists along with disruptions to nearby residents

Disruptions to local businesses, especially small, family-owned and legacy businesses

Disruptions to the historic and cultural Little Tokyo neighborhood

I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 44-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 45

Susan Kashiwabara
Received December 11, 2023

Comment No. IND 45-1

My name is Susan Kashiwabara, and I work & am a member at Higashi Honganji Buddhist Temple in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

Our temple will be celebrating its 120th Anniversary in 2024 and have been at our current location in Little Tokyo for nearly 50 years. We are proud to be a part of this community which continues to work hard to preserve our heritage. It is without question that it is a struggle to maintain and serve our community, but it is our passion and the passion of our community leaders that have maintained Little Tokyo and our hopes for it to be a thriving community for future generations and welcoming to all.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the Higashi Honganji Buddhist Temple, located at 505 E. Third Street, which is also a cultural and historic resource in the City of Los Angeles.

Response to Comment No. IND 45-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 45-2

In addition, I am concerned about construction impacts from the proposed Project, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshipping, and visiting Little Tokyo. These significant impacts include:

*Construction along with noise and debris/dust/pollution emissions

*Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets

*Disruptions to local businesses, especially small, family-owned and legacy businesses

*Disruptions to nearby residents, child care centers, and places of worship

*Disruptions to the historic and cultural Little Tokyo neighborhood

Thank you for listening to our voices and your consideration in planning this project.

Response to Comment No. IND 45-2

This comment raises a list of concerns included in Comment No. IND 26-2. Refer to Response to Comment No. IND 26-2, which addresses these concerns.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 46

Allison Kamiya
Received December 11, 2023

Comment No. IND 46-1

My name is Allison Kamiya and I am a frequent visitor to Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been a frequent visitor to many Little Tokyo businesses/services throughout my life, including attending family services at Koyasan.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 46-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 46-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the economic and demographic impact to local small businesses. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 46-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also raises concerns regarding economic and demographic impacts to local small businesses. Refer to Response to Comment No. ORG 1B-10, which addresses concerns regarding displacement. As stated in CEQA Guidelines Section 15131, economic or social effects of a project shall not be treated as significant effects on the environment.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 47

Szo Kiat Lee
Received December 11, 2023

Comment No. IND 47-1

I am writing to give my strong support for the 4th & Central development. As a resident of Downtown and a frequent visitor of Little Tokyo and the Arts District, this is an exceptional project that needs to happen as soon as possible. If anyone has ever been to where the project is slated to be, it is extremely apparent that this area is barren and in need of revitalization. This mega project would do that, and knit Little Tokyo and Arts District even closer together, while also expanding the livable parts of downtown further. I have full confidence that the impact of this development would be miniscule, any slowdown or threats to derail has no standing, given the limited number of people to even impact nearby. People's reasonable concerns should be addressed, but not in the place of watering down this project.

This project provides so much to revitalize this corner of the two neighborhoods,1,521 residential units - including 949 rental units, 572 for-sale homes, and 214 units of affordable housing, is desperately needed for a city and neighborhood that continues to experience housing shortages and ever increasing rents. Demand for living in these massively popular neighborhoods are not going down, but constantly trending up. Providing over 1,500 homes is key to keeping prices in check! People need to go somewhere and having new residents add to the vitality of our downtown neighborhoods is the best place to go about it. I absolutely love that this project provides opportunities to buy units. As we all know, homeowners are more likely to invest and want what's best for the neighborhood. This is something we need more of in Downtown.

On top of that. the other components of the project like the roughly 411,000 square feet of offices, approximately 45,000 square feet of retail space, nearly 56,000 square feet of restaurant space, and a 68-key hotel, are all extremely needed to further economic development, vitality, and energy of not only Little Tokyo and the Arts District, but for all of Downtown LA. This project also sits within walking distance of the Little Tokyo/Arts District station, and it isn't very far from the eventual 6th St station for the B/D Line extension, PLUS an eventual West Santa Ana Branch station on 7th/Alameda. This area is exceptionally transit accessible and walkable that will inevitably encourage future residents to live a low-carbon, sustainable, urban lifestyle. This is the type of growth Downtown and the rest of the city should be striving for.

Enough with the small developments of five-over-ones, when large high rise developments are feasible like this. I would hate it if this project was downgraded or severely watered down because of a loud minority of activists that have confused the cause and effect of gentrification. I am invested and truly love Downtown, and I want to see Downtown be successful in our continued renaissance. As Downtown continues to recover from the devastating impacts of COVID-19, this project will help Downtown take

a big step towards the right direction. Our Central Business District deserves better. I implore LA City Planning to give its full support to moving this project forward.

Thank you for your time.

Response to Comment No. IND 47-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 48

Kathy Masaoka
Received December 11, 2023

Comment No. IND 48-1

My name is Kathy Masaoka and I have worked in and volunteer in Little Tokyo because I am concerned with the present and future betterment of this/my community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

For 50 years, from 1971 until the present, I have been actively engaged with organizations headquartered in Little Tokyo and have worked on issues of housing, reparations and sustainability and serve on the Board of the Little Tokyo Service Center. As someone who helped to build the grassroots campaign for reparations for the unjust incarceration and removal of Japanese Americans and who is also engaged in support of reparations for the enslavement of African Americans, I have come to see even more clearly how the destruction of our communities was a result of racist policies and have impact today. The City of LA has not made amends to the JA community nor has it put the wishes of the community at the forefront.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 48-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

The commenter also provides personal background information and political beliefs regarding the Japanese American community. These comments are acknowledged although they do not fall within the purview of CEQA.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 48-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 48-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 49

Eric Chu
Received December 11, 2023

Comment No. IND 49-1

I am a resident at Tokyo Villa (222 S Central Ave) (6+ yrs) and a board member of the Arts District & Little Tokyo Neighborhood Council (2+ yrs).

I support the 4th & Central Cold Storage project because we need higher housing density in downtown Los Angeles.

I strongly advocate for the project to be a community+ project which

- prioritizes people over cars

- connects the project physically (safe+ green sidewalks, bike lanes, shaded bus stops, pedestrianized zones) and culturally to the communities of Little Tokyo, Skid Row, & Arts District

- creates public spaces, especially GREEN ones, for young and old to enjoy.

Response to Comment No. IND 49-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 50

Midori Tachibana
Received December 11, 2023

Comment No. IND 50-1

My name is Midori Tachibana, and my family and I have been both business and property owners in both Little Tokyo and the Arts District since 1981. Having seen many new developments and their impacts on the community, I am especially concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

Although the developer has reasons for the plans they have chosen for the area, I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. Since your project will essentially be a bridge between the Arts District and Little Tokyo, I hope they will consider the implications of such a stark change.

Response to Comment No. IND 50-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 50-2

We have so many vulnerable populations living so close to your large-scale project that I believe it will have considerable impacts on their everyday lives (noise, traffic, and air quality issues). Three generations of families have been able to comfortably exist in this special Little Tokyo neighborhood for over a century and nearly all our historical buildings/ establishments are still in use and make significant impacts to our daily lives.

I personally went to the Lumbini Daycare, attended every summer event at Centenary Church and Higashi Hongangi, shopped or visited my aunt's jewelry store in the Little Tokyo Mall 3-4 times/ week, and lived in Tokyo Villa while my family ran their business in Honda Plaza. My entire childhood has been here.

Significant concerns/ impacts include:

- Noise and debris/dust/pollution emissions during construction with daycares, places of worship, and elderly residential communities within 1 block away.
- Increased vehicle traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets because of diverted traffic.
- Daily safety concerns for pedestrians and nearby residents as our community is mostly accessed on foot, not bike.
- Diversion of business away from the Little Tokyo legacy businesses that are struggling to survive.
- General rise of rents due to establishments geared towards the younger wealthier individuals who may be drawn to your project.

Response to Comment No. IND 50-2

This comment raises a list of concerns included in Comment No. IND 26-2 and expresses safety concerns for pedestrians. Refer to Response to Comment Nos. IND 26-2, as well as Response to Comment Nos. ORG 2B-15, ORG 2B-16, and ORG 2B-22, which address pedestrian and bicycle safety.

This comment also raises concerns regarding displacement and gentrification, which are similarly expressed in Comment Nos. ORG 1B-10 and 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 50-3

I hope the project will consider:

- More family accessible common areas/ green spaces as the children and elderly in our area have little greenery that is close by to enjoy. We certainly have a LOT of condos and new structures though.

- Smaller sized retail/ commercial spaces for smaller businesses to thrive. Our community has seen many businesses come, go, move, adapt within the area because the smaller spaces have allowed some flexibility.

- More designated affordable/ below market units for the individuals in our community that are finding it harder and harder to live close to their workplace here in Little Tokyo.

- Cooperation and communication with the Little Tokyo community to create a smooth physical pathway between the Metro Station and your project (through Little Tokyo). I hope to work together so our community can encourage the overall benefit to the area through your project.

With consideration of input from neighboring communities, I hope the project becomes a beautiful corridor between the historic Little Tokyo and the newer Arts District adjacent. Please help us preserve the history of this very special place called Little Tokyo. I hope you and so many others will visit us often and have experiences here that will be [sic] stay in your memory like so many others.

I also support the letter submitted to the City by the Little Tokyo Community Council who have been meeting tirelessly to be the voice of our tiny immigrant community.

Thank you so much for taking the time to recognize our concerns.

Response to Comment No. IND 50-3

This comment provides recommendations for the Project to consider. First, with regard to open space, the Project would include 90,113 square feet of publicly-accessible open space, including paseos passing through the Project Site between Central Avenue and Alameda Street, plazas, and pocket parks within the North and South Sites. Retail spaces would be sized based on market needs, but the commenter's recommendation for smaller spaces is noted. The Project would include an affordable housing component. As stated on page II-19, in Chapter II, *Project Description*, of the Draft EIR, the Project would set aside 5 percent of the total rental units for Extremely Low-Income Households. In addition, and consistent with Measure JJJ, between 11 percent and 40 percent of the total units built would be set aside for Very Low-, Low-, or Moderate-income households. The commenter also recommends cooperation and communication by the Project with the Little Tokyo community to create a smooth physical pathway between the Metro station and the Project Site (through Little Tokyo). The Project is not responsible for providing a complete connection from the Project Site to the Metro Regional Connector Little Tokyo/Arts District Station. Additional pedestrian improvements would continue to occur as future development occurs along such pedestrian corridors and with improvements made by the City funded by the City's Mobility Trust Fund.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is

necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment also makes reference of support for a letter provided by LTCC. This letter and responses to the comments provided therein are provided as Comment Letter ORG 2B and Response to Comment Nos. ORG 2B-1 through ORG 2B-42, respectively. As this portion of the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. However, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment Letter No. IND 51

Ted Oyama
Received December 11, 2023

Comment No. IND 51-1

I would like to comment on this proposed development.

I believe as a design professional this is totally out of scale with the adjacent neighborhoods. Where is the urban context?

Response to Comment No. IND 51-1

This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 51-2

Added traffic congestion is one major concern since the streets are not designed to accept thousands of cars in the morning and at quitting time.

Response to Comment No. IND 51-2

This comment raises concerns about traffic. The Project's CEQA transportation impacts were evaluated in Section IV.J, *Transportation*, of the Draft EIR, as required by CEQA and the City of Los Angeles Department of Transportation (LADOT). The Project's impacts from vehicle trips generated by the Project on intersection operations in the Project vicinity are included in Chapter 5, *Non-CEQA Transportation Analysis*, of the Project's Transportation Assessment (TA), included as Appendix J, of the Draft EIR. The results of the analyses of non-CEQA topics and the proposed corrective actions identified in the TA would be addressed through potential Project conditions of approval. Refer to Response to Comment No. IND 4A-2 for additional discussion of the Project's CEQA impacts as evaluated in Section IV.J, *Transportation*, of the Draft EIR, and the non-CEQA impacts analyzed in Chapter 5 of the TA.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications. Applicable updates to the CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

Comment No. IND 51-3

How is this development addressing the unhoused community in the immediate area?

Response to Comment No. IND 51-3

The comment asks about how the Project is addressing the unhoused community in the immediate area. As stated in CEQA Guidelines Section 15131, economic or social effects of a project shall not be treated as significant effects on the environment. As such, this topic was not evaluated in the Draft EIR, and no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 51-4

I go to Little Tokyo every week to attend religious services at Higashi Temple on Third Street . [sic] Change is inevitable but I do not believe this is appropriate at this proposed high rise scale.

Little Tokyo area is a historical district and existed for over 100 years. Is Chinatown next to be altered with high rises?

I can see mid rise development or lower high rises similar to the development closer to the Railroad overpass on third street currently under construction.

Response to Comment No. IND 51-4

This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment also raises concerns regarding gentrification, which is similarly expressed in Comment No. 1B-11. Refer to Response to Comment No. ORG 1B-11, which addresses these concerns.

Comment No. IND 51-5

Less [sic] all be reasonable. I don't not [sic] believe this proposal is the best solution for its location. Let the developer go back to the drawing board and down scale the proposal.

Response to Comment No. IND 51-5

This comment expresses general opposition to the Project. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity, as well as modifications made to the Project, which reduce the Project's maximum building height. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 52

Steve Nakasone
Received December 11, 2023

Comment No. IND 52-1

My name is Steven Nakasone, and my family and I worship at Highashi Honganji in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

Our family have been temple members for more than twenty years and have I have [sic] been shopping, dining and attending events in Little Tokyo for over seventy years.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the Higashi Honganji Buddhist Temple, located at 505 E. Third Street, which is also a cultural and historic resource in the City of Los Angeles.

Response to Comment No. IND 52-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment states that the Project is out scale for the immediate surroundings and It will alter the existing historic Little Tokyo community. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

In addition, the commenter states the Project would overshadow the Higashi Honganji Buddhist Temple. Refer to Response No. ORG 2B-5, which addresses historic resources impacts to the Higashi Honganji Buddhist Temple. As discussed therein, the Higashi Honganji Buddhist Temple is located approximately 785 feet from the Project Site with intervening structures along both sides of Central Avenue, including the Little Tokyo Market and the Centenary United Church on the east side of Central Avenue and various commercial/light industrial buildings on the west side of Central Avenue. Between these intervening structures and the temple is the intersection of 3rd Street and Central Avenue. Consistent with CEQA Guidelines, as there are no reasonably foreseeable potential impacts that would materially impair the Higashi Honganji Buddhist Temple, such that it would no longer convey its significance, it is outside of the Study Area for the Project.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is

necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 52-2

In addition, I am concerned about construction impacts from the proposed Project, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshipping, and visiting Little Tokyo.

These significant impacts include:

*Construction along with noise and debris/dust/pollution emissions

*Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets

*Disruptions to local businesses, especially small, family-owned and legacy businesses

*Disruptions to nearby residents, child care centers, and places of worship

*Disruptions to the historic and cultural Little Tokyo neighborhood

Response to Comment No. IND 52-2

This comment raises a list of concerns included in Comment No. IND 26-2. Refer to Response to Comment No. IND 26-2, which addresses these concerns.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 53

Shin Ito
Received December 11, 2023

Comment No. IND 53-1

My name is Shin Ito, and I worship at Higashi Honganji Buddhist Temple in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been a part of the temple since I was born, as my father was the head minister at the temple, when he was alive. Now, my brother is the head miister [sic] at temple. Obviously, the temple has been a huge part of my life, but it is also importnt [sic] to the lives of our many members.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the Higashi Honganji Buddhist Temple, located at 505 E. Third Street, which is also a cultural and historic resource in the City of Los Angeles.

Response to Comment No. IND 53-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment states that the Project is out scale for the immediate surroundings and It will alter the existing historic Little Tokyo community. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

In addition, the commenter states the Project would overshadow the Higashi Honganji Buddhist Temple. Refer to Response to Comment No. ORG 2B-5, which addresses historic resources impacts to the Higashi Honganji Buddhist Temple. As discussed therein, the Higashi Honganji Buddhist Temple is located approximately 785 feet from the Project Site with intervening structures along both sides of Central Avenue, including the Little Tokyo Market and the Centenary United Church on the east side of Central Avenue and various commercial/light industrial buildings on the west side of Central Avenue. Between these intervening structures and the Temple is the intersection of 3rd Street and Central Avenue. Consistent with CEQA Guidelines, it is outside of the Study Area for the Project as there are no reasonably foreseeable potential impacts that would materially impair the Higashi Honganji Buddhist Temple, such that it would no longer convey its historical significance.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 53-2

In addition, I am concerned about construction impacts from the proposed Project, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshipping, and visiting Little Tokyo.

These significant impacts include:

*Construction along with noise and debris/dust/pollution emissions

*Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets

*Disruptions to local businesses, especially small, family-owned and legacy businesses

*Disruptions to nearby residents, child care centers, and places of worship

*Disruptions to the historic and cultural Little Tokyo neighborhood

Response to Comment No. IND 53-2

This comment raises a list of concerns included in Comment No. IND 26-2. Refer to Response to Comment No. IND 26-2, which addresses these concerns. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 54

Trish Nicholson
Received December 11, 2023

Comment No. IND 54-1

My name is Patricia Nicholson, and I am a [sic] active member of Higashi Honganji Buddhist Temple in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been a member of the Higashi temple since before it relocated to Little Tokyo in 1976. I continue to attend services and participate and lead activities which include residents of Little Tokyo and members of our temple.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 54-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 54-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about how it will change the "feel" of Little Tokyo. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 54-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also raises concerns about how it will change the “feel” of Little Tokyo. Refer to Response to Comment No. 54-1 for a discussion of the Project’s compatibility with the surrounding Project vicinity.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 55

Andie Kimura
Received December 11, 2023

Comment No. IND 55-1

My name is Andie Kimura and I am writing concerning the 4th and Central Project located adjacent to Little Tokyo. I'd like to first thank you for hearing the community's need for an extended public comment period. Though it was still a short turnaround, the extra time was appreciated.

Response to Comment No. IND 55-1

This comment thanks the City for extending the original public review comment period to 61 days concluding on December 11, 2023. As this comment does not raise a concern with respect to the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. IND 55-2

While I do not currently live in Little Tokyo, I have always considered the neighborhood as home. It has been the site of formative years for me both educationally, spiritually, and professionally and continues to shape who I am as a person. I am approaching this proposed project through my background in architecture and cultural spaces.

It is for this reason that I feel obligated to voice my concern about the size and heights of the buildings, which are completely out of scale with the existing and surrounding development in Little Tokyo. Denying neighbors access to sun and altered air flow due to huge shadow casts and enormous dark buildings that absorb heat and will require more intense air conditioning (furthering emissions and generator heat) will continue to negatively harm surrounding communities if the project were to be completed as currently proposed.

Response to Comment No. IND 55-2

The commenter’s identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project’s size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project’s compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

The comment raises concerns about increased emissions and generator heat effects on the community. The Draft EIR addressed air quality impacts in Section IV.A, *Air Quality*, with supporting data provided in Appendix B, Air Quality/Greenhouse Gas Emissions Technical Documentation, of the Draft EIR. As analyzed therein, the Project would result in less-than-significant impacts related to long-term operational air quality emissions. In addition, as evaluated in Section IV.E, *Greenhouse Gas Emissions*, with supporting documentation provided in Appendix B, Air Quality/Greenhouse Gas Emissions Technical Documentation, of the Draft EIR, GHG impacts would also be less than significant.

The comment also raises concerns about potential shadows cast by the Project. The Project's CEQA documentation does not include a shade study as shading is not considered a CEQA impact. Furthermore, as discussed in the Project's Initial Study, which is included in Appendix A of the Draft EIR, Senate Bill (SB) 743 (Public Resources Code [PRC] §21099[d]) sets forth guidelines for evaluating project aesthetic impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." Furthermore, the related City of Los Angeles Department of City Planning Zoning Information (ZI) No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA." PRC Section 21099 and ZI No. 2452 apply to the Project. Therefore, the Project is exempt from significant aesthetic impact findings.

Refer to Appendix C of this Final EIR for air quality and greenhouse gas emissions technical data associated with the Project with design modifications, as discussed below. Applicable updates to the respective CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 55-2

The project is also not culturally considerate, not just of Little Tokyo, but being situated in Los Angeles in general. This project is designed as if it could be plopped into another metropolis and doesn't take into account how people and vehicles will move throughout and around the site considering the mass amount of people this project aims to attract through housing, hotel, office, and retail.

I am in support of development and much needed housing, however what this project fails to consider, and what is evident in the DEIR report are the significant impacts including:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

More importantly, the blatant disregard to the surrounding context and omission of Little Tokyo as a historic and cultural resource is alarming. Not only will the project contruction's [sic] noise, traffic, mobility safety, and air quality negatively affect ALL nearby stakeholders, once complete, the project as currently proposed will continue to harm neighboring communities.

I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 55-2

This comment states that the Project was designed without consideration of how people and vehicles will move throughout and around the site. With regard to pedestrian movement, the Project would enhance the overall pedestrian experience in the Central City area by creating new pedestrian connections through the Project Site and expansive publicly-accessible open spaces to transform the Project Site into a walkable part of the neighborhood. Also, the Project's site plan, including its plans for vehicular access, would be subject to review and approval by the City of Los Angeles Department of Transportation (LADOT) to ensure adequate vehicular site access in and around the Project Site.

The commenter also states that the Draft EIR omitted Little Tokyo as a historic and cultural resource. This issue is similarly mentioned in Comment Nos. ORG 2B-5 and ORG 2B-6. Refer to Response to Comment Nos. ORG 2B-5 and ORG 2B-6, which discuss impacts to Little Tokyo. As discussed in these responses, the Little Tokyo District it is not a resource that has "a reasonably foreseeable" potential to be substantially impacted by the Project and as such, the Draft EIR was not required to analyze impacts to the Little Tokyo District as a historic resource.

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 56

Grace Yamashiro
Received December 11, 2023

Comment No. IND 56-1

My name is Grace Yamashiro and I worship at Higashi Honganji Buddhist Temple in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been a member of the Higashi Honganji Buddhist Temple since I was born. At that time, the temple was located on Mott St. in Boyle Heights, and my father was instrumental in the move of the temple to its current location in Little Tokyo. Thus, I "grew up" attending the temple at both of its locations, and am currently on the temple board of directors.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 56-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 56-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

I support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 56-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 57

Leslie Andrew Ridings
Received December 11, 2023

Comment No. IND 57-1

I write to voice my strong support for the 4th & Central development (ENV-2021-4071-EIR).

As a resident and stakeholder in Downtown Los Angeles, who frequently visits Little Tokyo and the Arts District, I believe this is an exceptional project that should be allowed to proceed to fruition.

Not only would this massive investment in the community further knit Little Tokyo and the Arts District, it would expand the larger envelope of desirable livable area in downtown, attract more residents and investment in our community, and also do this all in an area where impacts on its surroundings would be minimal. I urge you to consider reasonable concerns, but to move this project forward. Despite the vocal minority of appellants fears, increased investment in our cities densest job, residential, and transit-served hub are a very good thing!

This project would bring 1,521 residential units-949 rental units and 572 for-sale homes-214 units of which would be affordable housing vital to alleviating LA's housing shortage. Further, the inclusion of a for-sale units encourages not only further long term investment, but will likely be more affordable than equivalent single family Homes for first time buyers and folks seeking to live in a more urban setting.

Included in the project are roughly 411,000 square feet of offices, approximately 45,000 square feet of retail space, nearly 56,000 square feet of restaurant space, and a 68-key hotel, all within easy walking distance of the Little Tokyo/ Arts District Metro station, and even closer to the planned 6th St station for the BID Line and the planned West Santa Ana Branch station on 7th/Alameda. This area is exceptionally transit accessible and that will inevitably encourage future residents to live a low-carbon, sustainable, urban lifestyle that decreases vehicle reliance and increases a building of community.

This is the type of growth Downtown and the rest of the city should be striving for.

Thank you,

Response to Comment No. IND 57-1

The commenter’s identification as a stakeholder in Downtown Los Angeles is acknowledged by the City. The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 58

Francis Cullado
Visual Communications Media
120 Judge John Aiso St.
Los Angeles, CA 90012
Received December 11, 2023

Comment No. IND 58-1

I am submitting this comment letter on behalf of VISUAL COMMUNICATIONS MEDIA, which is located in Little Tokyo. Founded in 1970 with the understanding that media and the arts are powerful forms of storytelling, Visual Communications creates cross-cultural connections between peoples and generations. Our mission is to develop and support the voices of Asian American & Pacific Islander filmmakers and media artists who empower communities and challenge perspectives.

We have a vested interest in - and history of - fighting for justice for the broader Nikkei community as well as the local community of Little Tokyo. With regards to the proposed 4th and Central Project, we stand with organizations such as the Little Tokyo Community Council, Nikkei Progressives, and Little Tokyo Service Center - and call for the Planning Department to require the developer of this project to further demonstrate that they are mitigating the negative effects of this project and working with the communities of Little Tokyo and Skid Row to ensure that this is a project which will benefit both of these historic cultural communities of color.

Response to Comment No. IND 58-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment provides background information about Visual Communications Media. The comment also makes a general statement that the developer of the Project should further demonstrate that they are mitigating the negative effects of the Project and working with the communities of Little Tokyo and Skid Row to ensure that this is a Project which will benefit both of these historic cultural communities of color. The City has prepared a Draft EIR and this Final EIR, which adequately analyze and disclose the Project impacts on the environment, in accordance with the requirements of CEQA. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 58-2

Relative to environmental impacts of the project, we find that the Draft EIR as submitted does NOT meet the standards articulated in the CA Environmental Quality Act (CEQA) guidelines for disclosure of a project's significant environmental effects.

We are supportive of and reiterate the concerns raised in the Little Tokyo Community Council's letter – submitted to you via email:

- Nearby stakeholders have not had adequate time to review the draft EIR
- The draft EIR does not adequately address the projects impact on cultural & historic resources – and egregiously does not recognize Little Tokyo as an adjacent cultural & historical district
- The draft EIR incorrectly analyzes its impact on traffic in the area
- The project as proposed inadequately addresses issues of pedestrian and bicycle connectivity with adjacent communities
- The draft EIR does not adequately address construction impacts of the project
- The project as proposed does not provide adequate detail about publicly accessible open spaces – specifically types of amenities that will be provided for community members who do not live on-site, especially those who are unhoused
- The draft EIR and project description do not provide any analysis of the shadow which the 40+ story tower will cast on the adjacent neighborhoods of Skid Row and Little Tokyo
- The draft EIR does not adequately address displacement concerns - particularly the indirect displacement of residents in the adjacent neighborhood and businesses in the adjacent neighborhood

In addition to the above comments - which were documented in more detail in the aforementioned letter from the Little Tokyo Community Council, Visual Communications urges the Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package.

Response to Comment No. IND 58-2

This comment includes the same list of concerns listed in Comment Nos. ORG 1B-4 to 1B-10. Refer to Response to Comment Nos. ORG 1B-14 to 1B-10, which address these concerns.

This comment also requests the City's Planning Department to require the developer to work with representatives from Little Tokyo and Skid Row to develop a mutually agreed upon community benefits package. Refer to Response to Comment No. ORG 1B-12, which addresses this comment.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is

necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 58-3

This project is completely out of context with the surrounding communities of Little Tokyo and Skid Row – both in terms of its massive scale as well as its character. The proposed project will endanger the adjacent neighborhoods and overshadow the nearby area: putting residents, businesses, non-profits, other organizations and religious institutions at risk of displacement.

Response to Comment No. IND 58-3

This comment is the same as provided in Comment No. ORG 1B-13. Refer to Response to Comment No. ORG 1B-13, which addresses this comment. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 58-4

Given the disproportionately negative impact which the project will have on two historic communities of color – both of which have borne the brunt of decades of systemic racism in City Planning, if the Planning Department is to follow its stated goal of racial equity, it must follow the lead of those who are most affected by this project and ensure that the developer is responsive to these clearly articulated concerns by our communities.

Thank you for your consideration of these comments. We look forward to revisions to the Draft EIR.

Response to Comment No. IND 58-4

The content in this comment is the same as Comment No. ORG 1B-14. Refer to Response to Comment No. ORG 1B-14, which addresses this comment. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 59

Jacob Paris
Received December 11, 2023

Comment No. IND 59-1

I am writing regarding the development at 400 Central Ave [ENV-2021-4071-EIR]. This is a major project for the Arts District-Little Tokyo area. This area's been such an industrial no-man's land for the longest time. Features I saw in the Project Description section like more bike parking, trees, and walkways are great. Large warehouse spaces like these in Downtown LA should be reclaimed for the community. Opportunities like these to make the city more walkable don't come often. More housing, less warehouses. I don't see why we shouldn't be doing that. Thank you for your consideration.

Response to Comment No. IND 59-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 60

Tom Grode
Received December 11, 2023

Comment No. IND 60-1

My name is Tom Grode and I write to you as a former resident of Skid Row and active participant in the Skid Row Now and 2040 coalition since it began six years ago. Over these past six years, we've built a very productive and mutually respectful relationship with the DTLA 2040 team at DCP.

I recently was on a very informative EIR zoom with dozens of other folks which focused on the negative Little Tokyo implications of 4th and Central. I know you are receiving input regarding numerous concerns and I agree with those concerns. But I want to focus on one thing.

I am not aware of any community engagement towards Skid Row at all regarding this massive project. In fact, past media doesn't even acknowledge Skid Row, instead referring to the neighborhood below Little Tokyo as Arts District Adjacent.

In the days following the George Floyd murder, City Planning sent out an email saying of the 400 staff in the Department of City Planning, around 25% specifically work there to deal with the negative impact past Urban Planning policies have had on poor/people of color neighborhoods.

Skid Row is a primarily Black residential neighborhood. In terms of equity and historic injustice, the lack of engagement with Skid Row around this project is disturbing to the point of scandalous.

Response to Comment No. IND 60-1

This comment states the Project has not engaged enough with Skid Row. Of note, both in advance of and during the entitlement process, the Applicant met with a broad array of stakeholders within the Downtown Los Angeles community, including, but not limited to residents, Neighborhood Councils/members, BIDs, non-profit service providers, shelters, community groups, schools, small businesses, artists, art groups, and labor groups. In the Skid Row/Industrial District area, the applicant conducted outreach to and engaged in dialogue with the Neighborhood Council, BID, shelters, schools, small businesses, artists, community-based art groups, and residents. Refer to Response to Comment No. ORG 12-5 for additional information on the Project's outreach efforts.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 61

Kathy K. Pham
Received December 11, 2023

Comment No. IND 61-1

My name is Kathy Pham, and I am a long time resident of Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 61-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 61-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

Construction along with noise and debris/dust/pollution emissions

Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
Safety concerns for pedestrians and cyclists along with disruptions to nearby residents

Disruptions to local businesses, especially small, family-owned and legacy businesses Disruptions to the historic and cultural Little Tokyo neighborhood

I am worried about how this project will impact the walkability and cultural integrity of the neighborhood. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 61-2

This comment raises a list of concerns included in Comment No. IND 26-2 and expresses safety concerns for pedestrians and cyclists. Refer to Response to Comment Nos. IND 26-2, as well as Response to Comment Nos. ORG 2B-15, ORG 2B-16, and ORG 2B-22, which address pedestrian and bicycle safety.

This comment also raises concerns about walkability and cultural integrity of the neighborhood. With regard to walkability, the Project would enhance the overall pedestrian experience in the Central City area by creating new pedestrian connections through the Project Site and expansive publicly-accessible open spaces to transform the Project Site into a walkable part of the neighborhood. Also, refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment also makes reference of support for a letter provided by LTCC. This letter and responses to the comments provided therein are provided as Comment Letter ORG 2B and Response to Comment Nos. ORG 2B-1 through ORG 2B-42, respectively. As this portion of the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. However, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment Letter No. IND 62 (A-C)

Mitchell Matsumura
Received December 11, 2023

This comment includes copies of the same form letter dated December 11, 2023 and signed by the below listed people. A copy of the form letter is provided in the responses below.

Linda Yamada
Elaine Takahashi
KP Kuo
Enzo Perez
Matthew Hom
Suzanne Isaego
Bethany Ahlberg
Richard Kato
Erika Espinoza
Tamyke Edwards
Julian Mendieta
Miho Murai
Lin Nakashima
Ron Frank
Tonya Jaynes
Tyler Karasawa
Barbara Hertz
Jimmy Rivera
Sei Nakashima
Kimika Nakashima
Eric Sham
Meika Best
Juniper Wong
Daniel Omectin
T. Drompoole
Salsabil
Tany Ling
Katherine Ward
Sky Bird
Fernanda Sanchez
Pamela Agustin
Hayk Makhmuryan
Mantle Nam
Anthony Chua
Crystal Baranyk
Donna Maeda

Sandy Lee
Joyce Valenzuela
John Urjuin
Mariko Bird

Comment No. IND 62-1

My name is [Insert Name] and I live/work/worship at [Inert Place] in Little Tokyo and am concerned with the present and future of the Little Tokyo community specifically the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings, with the tallest standing at forty-four stories.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 62-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 62-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

Construction along with noise and debris/dust/pollution emissions
Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
Safety concerns for pedestrians and cyclists along with disruptions to nearby residents

Disruptions to local businesses, especially small, family-owned and legacy businesses Disruptions to the historic and cultural Little Tokyo neighborhood

I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 62-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 63

Yasue Katsuragi
Received December 11, 2023

Comment No. IND 63-1

My name is Yasue Katsuragi, and I work at Little Tokyo Service Center in Little Tokyo asn [sic] a community organizer and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 63-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 63-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, as a community organizer, I work with many low-income and monolingual seniors living in Little Tokyo. They needed to be informed and protected by these issues as well. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 63-1

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

The commentor also states that low-income and monolingual seniors living in Little Tokyo need to be informed and protected by these issues as well. Refer to Response to Comment No. ORG 12-5 for information on the Project's outreach efforts.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 64

Kimi Maru
Received December 11, 2023

Comment No. IND 64-1

My name is Kimi Maru and I live in Monterey Park and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been involved in the Little Tokyo community for the past 33 years, since moving to the Los Angeles area. I was an early board member of the "Rec Center" in the 1990's, what is today the Budokan. I have been participating in weekly Zumba classes at the Higashi Honganji Buddhist Temple for the past 12 years, where we go eat in Little Tokyo following our class. And I continue to participate in issues and events in Little Tokyo more than anywhere else. I have seen new developments in Little Tokyo which have not been in keeping with our community's needs or desires, and this 4th and Central project is already looking like that.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions. There are no other buildings in the surrounding area that are even close to being 44 stories tall, so this will be an eye-sore to Little Tokyo, the Arts District and the area.

Response to Comment No. IND 64-1

The commenter’s identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project’s size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project’s compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 64-2

In addition to the above, I am concerned about how much affordable, low-income housing this development will provide. The unhoused population in the immediate area is an urgent issue that needs to be addressed by any new developments in the area. I have not heard of any numbers of units or cost that the development commits to providing for low-income residents and unhoused people, which is troubling.

I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 64-1

This comment expresses concerns regarding the project's inclusion of affordable housing. As discussed on page II-9, in Chapter II, *Project Description*, of the Draft EIR, the Project is subject to certain Measure JJJ provisions, codified in Los Angeles Municipal Code (LAMC) Section 11.5.11. The Project would set aside 5 percent of the total rental units for Extremely Low-Income Households. In addition, and consistent with Measure JJJ, between 11 percent and 40 percent of the total units built would be set aside for Very Low-, Low-, or Moderate-income households.

Also, with regards to the unhoused population, as stated in CEQA Guidelines Section 15131, economic or social effects of a project shall not be treated as significant effects on the environment. As such, this topic was not evaluated in the Draft EIR, and no further response is necessary.

This comment also makes reference of support for a letter provided by LTCC. This letter and responses to the comments provided therein are provided as Comment Letter ORG 2B and Response to Comment Nos. ORG 2B-1 through ORG 2B-42, respectively. As this portion of the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. However, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment Letter No. IND 65

Annika Tamaki and Charlene Tonai Din
Received December 11, 2023

Comment No. IND 65-1

Our names are Annika Tamaki and Charlene Tonai Din and we are the co-presidents of the Nikkei Student Union at UCLA (est. 1981). As young Japanese American community leaders based in Los Angeles, we are very concerned with the present and future betterment of the Little Tokyo community. During this public comment time, we are writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

As co-presidents of the Nikkei Student Union at UCLA, we feel a profound connection to Little Tokyo, a vital hub of our cultural heritage. Many of our members boast deep familial ties to this historic enclave, while for others from diverse backgrounds, Little Tokyo serves as their first experience of a Japanese American community. Our organization actively engages in this vibrant neighborhood through numerous volunteering initiatives and social gatherings, deepening our members' understanding of its rich history and cultural significance. This enduring bond underscores our belief in the indispensable role that Little Tokyo, with its legacy businesses and community ties, plays in the fabric of our lives.

We are very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 65-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 65-2

In addition, we are concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, we also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 65-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 66

Jeanette Fantone
Received December 11, 2023

Comment No. IND 66-1

My name is Jeanette Fantone and I am a mutual aid volunteer working with the unhoused residents in Little Tokyo. I am writing concerning the 4th and Central Project, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I am a fourth generation Japanese-American. My family began in Los Angeles as produce farmers in Gardena, gathering in Little Tokyo to sell their stock and connect with the community. For my great grandparents, the most beloved aspect was their feeling of belonging in Little Tokyo, not experienced elsewhere.

The 4th and Central Project is extremely concerning to me. The proposed sizes and heights of these buildings not only clash significantly with the aesthetics of our remaining historic buildings, they will significantly besmirch the character of the neighborhood and directly impact our residents and community members' quality of life.

Response to Comment No. IND 66-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 66-2

Construction impacts, including noise, traffic, and air quality issues, will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the motivations and audience of this project. Little Tokyo is in a dire state of gentrification and empowering legacy businesses and the generational community that created the neighborhood in the first place must be paramount. I firmly support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 66-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments

This comment also raises concerns regarding displacement and gentrification, which are similarly expressed in Comment Nos. ORG 1B-10 and 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 67

Mickie Okamoto
Received December 11, 2023

Comment No. IND 67-1

My name is Mickie Okamoto, and my family and I are long time community members for organizations in in [sic] Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo. which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been [sic] worked in Little Tokyo, my children have gone to daycare/preschool, participate in various activities such as Girl Scouts, basketball and LA Buddhist youth community activities in Little Tokyo. We frequently patron businesses in the area and it is a second home for us.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 67-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 67-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

Construction along with noise and debris/dust/pollution emissions

Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets Safety concerns for pedestrians and cyclists along with disruptions to nearby residents Disruptions to local businesses, especially small, family-owned and legacy businesses Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned that the lack of consideration for unique/intangible gems created by the people and history of Little Tokyo continues to get lost. Once these gems are gone, they are irreplaceable. I am asking for your help and support this for my kids and the future generations. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 67-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also raises concerns regarding displacement and gentrification, which are similarly expressed in Comment Nos. ORG 1B-10 and 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 68

Emiko Kranz
Received December 11, 2023

Comment No. IND 68-1

My name is Emiko, and I am a board member at Go For Broke National Education Center in Little Tokyo who has volunteered in the community for over ten years now. Beyond that, I am tied to this space through the legacy of my great-grandfather's grocery store; the last time I visited Little Tokyo with my grandfather while he could still walk, he recounted where he would go to pick up the noodles, kamaboko fishcake, and vegetables for the store. This made me realize my connection to Little Tokyo goes far beyond myself; it is my family's history, as well as the history of so many people I have met, work alongside, and come to cherish as my friends.

As such, I'm very concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

Beyond my family ties to and volunteering experience in Little Tokyo, more recently I had the opportunity to study how crucial community-based services were for the wellness of our community during the height of the COVID-19 pandemic. To complete my Asian American Studies MA/Community Health Sciences MPH at UCLA, I assessed what factors enabled our community to uniquely promote wellness of its vulnerable populations when the City was overwhelmed and unable to reach those who needed resources. One example of this lies in Little Tokyo's shared value of trust: in May of 2021, after the first COVID-19 vaccine became available to the public, LA County was less than 60% vaccinated. However, at this time, Little Tokyo had already reached the highest threshold of over 95% vaccinated.

Through my analysis of all these interviews, it became clear that trust was critical to reach such a tremendous outcome; that trust comes from our organizations knowing what our community prioritizes. So I sincerely implore you to consider hearing us out and bringing us to the table when you situate your path forward with this project, as this trust not only helps us enact positive change for our community but also can be leveraged in support of projects moving forward.

The built environment plays a huge role in the everyday wellness of our community; I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 68-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

The commenter also makes reference to hearing out local organizations and bringing them to the table when moving the project forward. Refer to Response to Comment No. ORG 12-5 for information on the Project's outreach efforts within the community. There will also be additional opportunities for the public and local organizations to provide input to the City during the Project's hearing phase, whereby the City will consider whether to approve the Project.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 68-2

Of course, I am also concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living in, working in, worshiping in, and visiting Little Tokyo. Every single one of these aspects will in some way harm or disrupt our loved ones in the community.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

I also support the letter submitted to the City by the Little Tokyo Community Council. In addition to the above, I am concerned about the huge impact that gentrification is wreaking throughout our community; as someone who works in public health and intends to continue studying the importance of community-based organizations in supporting the wellness of cities, I find it critical that the city continues to not only acknowledge the strengths of community building but also prioritizes actions that help us strengthen our community care efforts. Landlords who wrongfully evict tenants that have served as pillars for our community's connectedness continue to prosper in Los Angeles, and I implore your consideration of supporting the work that we as a community collective do to make Little Tokyo the wonderful place it is today-as a place to visit, to live, to love, and to help others in.

I hope you will come to understand and remember that we of Little Tokyo do all of our work with gratitude for those who came before us, and will continue to organize to see that generations after us will continue to cherish our community as we do. Thank you for your time and consideration.

Response to Comment No. IND 68-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also raises concerns regarding displacement and gentrification, which are similarly expressed in Comment Nos. ORG 1B-10 and 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 69

Isaiah Sherman
Received December 11, 2023

Comment No. IND 69-1

Thank you for the chance to comment on the proposed Fourth and Central project in the Arts District. We need more housing in DTLA and all types of it. Low income, market rate, for sale, workforce, etc. We need all of it. I've lived in the Los Angeles area all my life and have seen and felt the impacts of the housing crisis. Projects like this that provide more housing opportunities are essential. 7.5 acres of warehouses and parking in the middle of this community is such a misuse of space in this day and age. Industrial uses like cold storage don't belong in today's Downtown.

Building as much housing as possible on this site, including affordable housing, is a much better use of space in Downtown.

Response to Comment No. IND 69-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 70

Carol Zou
Received December 11, 2023

Comment No. IND 70-1

My name is Carol Zou and I work at LTSC in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have worked in Little Tokyo for four years. I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 70-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 70-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the gentrification impacts that this development will have on Little Tokyo and Skid Row. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 70-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also raises concern regarding gentrification, which are similarly expressed in Comment Nos. ORG 1B-10 and 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address this concern.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 71

Yuji Kawana
Received December 11, 2023

Comment No. IND 71-1

My name is Yuji Kawana, I am the president of Yamasa Enterprises. Yamasa manufactures Asian Fishcakes that are sold across the nation to restaurants and grocery store chains. You may know our product in ramen noodles, it's the circular, white fishcake that has a pink swirl, [fishcake emoticon]. My grandfather started Yamasa in 1938 in Little Tokyo. My father moved the company to its current location in Skid Row in 1951. It was a different era back then. I grew up working in this factory, skid row has changed dramatically over the decades for the worse. Although I do not live in Los Angeles City, I am the landowner and business owner who employs 70+ people. Yamasa is located at 515 Stanford Avenue LA, CA 90013, a mere 2 blocks from the project site.

I am in FULL support of the Fourth & Central Project in its entirety as it will bring much needed investment, commercial activity and people to an area that has long been ignored, abandoned, and left to rot by the city and county.

Thank you for your time in this matter. I hope the project gets approved.

Response to Comment No. IND 71-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 72

Philip, Akira and Jo Ann Hirose
Received December 11, 2023

Comment No. IND 72-1

My name is Philip Hirose, and I co-own the family restaurant, Azay, in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

My family has been in Little Tokyo for 3 generations, since 1946 and we have owned and operated a beloved independent hardware store and family restaurant since, who is being threatened by developments like the 4th and Central Project.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institution.

Response to Comment No. IND 72-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 72-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about how it will destroy the fabric of Little Tokyo, one of the last 3 Japantowns in the United States. I also support the letter submitted to the City by the Little Tokyo. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 72-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also expresses general concerns regarding impacts to Little Tokyo. See Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 73

Ana Iwataki
Received December 11, 2023

Comment No. IND 73-1

My name is Ana Iwataki and my partner and his family own and operate two businesses in Little Tokyo---Azay restaurant and Anzen Hardware, in operation in Little Tokyo since 1946. I have been coming regularly to Little Tokyo since childhood and I currently work with an artist and archive based in Little Tokyo.

Given my lifelong, multigenerational connections to the neighborhood, I am deeply concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I also write as a PhD candidate at the University of Southern California. My dissertation research looks closely at the history of development in Little Tokyo and the Arts District. With this historical background in mind, as well my intimate knowledge of the challenges facing legacy businesses in the neighborhood, I would like to register a number of concerns with your office regarding the 4th and Central Project.

I feel the size and heights of these buildings are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 73-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 73-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

I do not feel that this development is being executed with the existing community in mind. Little Tokyo is a historic neighborhood that is already extremely precarious for many reasons. I believe this new development will exacerbate many of the problems it currently faces and which impact our most vulnerable residents and businesses most of all.

I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 73-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments. This comment also expresses general concerns regarding impacts to residents and businesses.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 74

Mayuki Nagamine
Received December 11, 2023

Comment No. IND 74-1

My name is Mayuki Nagamine, and I work at Higashi Honganji Buddhist Temple in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 74-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 74-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood
- I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 74-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 75

Bishop Noriaki Ito
Received December 11, 2023

Comment No. IND 75-1

My name is Noriaki Ito and I am a minister at the Higashi Honganji Buddhist Temple in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

Our temple was built in Little Tokyo back in 1976. We moved from our old temple in Boyle Heights where we had been holding Sunday service, memorial services and so forth on a regular basis from the mid-1920s. Our big event during the year is our Obon Summer Festival over a weekend in late July. I have been working on a daily basis at the temple located on the northwest corner of 3rd Street and Central Avenue.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 75-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 75-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned that the negative impacts may keep our members from visiting our facility as they do now. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 75-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also expresses general concerns regarding negative impacts that may keep members of the Higashi Honganji Buddhist Temple from visiting the facility as they do now. Refer to Response to Comment No. ORG 2B-5, which addresses impacts on the Temple.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 76

Kathleen Yamamoto
Received December 11, 2023

Comment No. IND 76-1

As a third generation Japanese American, who has been coming to Little Tokyo for an entire lifetime, I am deeply concerned with its fate, certainly as we move into the future.

This is one of the last remaining Little Tokyo communities in the country, and it is critically meaningful, not only for Japanese Americans, but also for those who appreciate its cultural value to the entire downtown area and for those who flock here from near & far.

I'm contacting you during this public comment period, alarmed about the 4th and Central Project which is, as you know, a large development covering over 7.5 acres and encompassing several buildings, with the tallest standing at forty-four stories.

This proposed development threatens to obliterate Little Tokyo as it now stands, with these out-sized buildings completely out of scale with the existing low-rise landscape of the area, and would overshadow local businesses, organizations, residences & religious institutions.

Response to Comment No. IND 76-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 76-2

Moreover, the proposed Project's construction would inevitably intrude levels of noise, traffic & poor air quality that would create an overall environment of pollution impacting everyone who lives, works, worships or comes to visit Little Tokyo.

The daily activity of a vital neighborhood - weddings, funerals, church services... children at pre- school & day care ... local, including legacy, businesses & institutions that also attract people from throughout Southern Californians & beyond - all of these would be severely disrupted.

I join those, including the Little Tokyo Community Council, in imploring you to consider the irreparable harm that the 4th and Central Project would wreak on an active community, a vital hub for a culture that has survived wartime fracture and is a part of Los Angeles that if essentially destroyed by this proposed development, cannot be replaced.

With sincere thanks for your attention to these concerns,

Response to Comment No. IND 76-2

This comment raises concerns related to noise, air quality and traffic, which are also raised in Comment No. IND 26-2. Refer to Response to Comment No. IND 26-2, which addresses these concerns. This comment also expresses general concerns regarding the potential for disruptions and harm to neighborhood activities and the Little Tokyo community.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 77

Mark Masaoka
Received December 11, 2023

Comment No. IND 77-1

I am Mark Masaoka, retired, and reside at 3060 St. George Street, Los Angeles, CA 90027. I write as a member of Nikkei Progressives, a grassroots community organization. I am Board Treasurer of a volunteer-based real estate investment corporation, the Little Tokyo Community Impact Fund (LTCIF). I lived at the Daimaru Hotel in Little Tokyo from 1972-1974, and at the Tomoye Hotel from 1975 to 1978 until I was displaced by redevelopment and received CRA relocation benefits. I worked part-time at the Japanese American Community Services office in Little Tokyo from 1972-1976. As a member of the Laborers and later Carpenters Unions. I did construction work on the JACCC plaza and on Union Church from 1975-1976. Since then, I have been active in several Little Tokyo community organizations, and serve as the Nikkei Progressives representative to the Little Tokyo Community Council.

My comments will address the historical and cultural significance of the Cold Storage lots, the impacts on small businesses, residential housing and the environment. I will suggest steps that the Project can take to mitigate some of these impacts.

Response to Comment No. IND 77-1

The comment provides background information on the commenter and introduces comments on the Project provided below, which is noted by the City. The commenter's identification as a stakeholder in Little Tokyo is also acknowledged by the City. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary.

Comment No. IND 77-2

Historical and cultural significance. The Cold Storage property is at the intersection of three communities—Little Tokyo which was far larger in earlier years; the light manufacturing and food processing buildings which became the Arts District; and a predominantly Black neighborhood that was the center of jazz culture in Southern California with hotels and clubs on Central Ave, and that extended into Little Tokyo during World War II.

The original Cold Storage facilities formed and developed as a key link in three local industry supply chains that it supplied with its refrigerated storage and ice-making capacities—before there were trucks, much less refrigerated trucks. The wholesale produce markets, largely Japanese -staffed, used ice to keep produce fresh, which largely came from Japanese American farmers. The wholesale flower market also largely came from Japanese American growers and used ice in shipping locally and by rail. Less known

is that local cold storage facilities processed fish from the 3,000 person Japanese fishing village on Terminal Island that lasted until World War II incarceration.

Small business impacts. The increase in large scale office, other commercial and market-rate residential developments in central city districts has led to new patterns of displacements of small businesses. To address this growing national problem, the Small Business Anti-Displacement Network formed in 2020 and had their first in-personal national conference this year, with representatives of the Little Tokyo Service Center and the LTCIF.

Little Tokyo small business will face new competitive pressures, particularly restaurants, from businesses in the new Fourth & Central. Because of their increasing vulnerabilities, the additional competition from Fourth & Central businesses is alarming. Little Tokyo has not faced such pressures before, being relatively insulated by its borders with the civic center, skid row, the pricier Arts District and the 101 Freeway.

1. The building of the new Little Tokyo/Arts District Metro Station and the coming West Santa Ana light rail station are major factors in bringing Fourth & Central to its Little Tokyo adjacent location. Land values are steadily rising, and corresponding rents too, even if a lagging factor. The LA Times (5/3/2023) attributed the rising rents and related eviction of Suehiro Café to the building of the new Metro station.

2. The small size of the lots and units in building designs and an aging utility infrastructure has kept a small, largely mom-and-pop business environment from competition from regional and national chains and much larger scale businesses. With the preponderance of family proprietors, there are multi-generational relationships with customers, other businesses and the broader Little Tokyo community. This does not happen with chains and their managers who come and go. There are many instances, with some notable exceptions, of businesses helping each other out.

3. Most of Little Tokyo's businesses are ethnic Japanese, Japanese American or Asian American. As it is with ethnic businesses in general, a smaller, more selective customer base--volume and thus profits are usually lower. A Japanese cosmetics store recently closed; a Japanese dry goods store was forced to move and a Japanese hardware store was narrowed saved by moving to a smaller location. This is in addition to the 23 businesses that closed during the Covid recession. Downtown businesses are suffering from the large numbers of workers working from home.

4. By being smaller, family-run ethnic businesses, they have the disadvantages of scale in purchasing and merchandising, and have less access to capital.

5. As rents increase, businesses can be forced into serving higher socio-economic classes of customers for the higher profit margins that those sales bring. Little Tokyo's customers are largely moderate and middle income and should stay there.

None of these heightening business pressures and expected displacements are the intended results on the part of the developer; they are however impacts that the developer must address.

Response to Comment No. IND 77-2

This comment provides background information on cold storage facilities. In addition, the commenter states concerns for impacts to small businesses in the Little Tokyo area. Concerns for impacts to small businesses and displacement are also raised in Comment No. ORG 1B-10. Refer to Response to Comment No. ORG 1B-10, which addresses these concerns.

Comment No. IND 77-3

Housing. It is a plus that Fourth & Central will not displace any residential units. But the rising land values are leading to higher rents for residential units nearby. Housing rents in [sic]

The DEIR recognizes its statutory requirements to provide affordable and low-income housing. The DEIR recognizes it will receive various economic benefits for housing construction through such measures as the Affordable Housing and Labor Standards Initiative, the Density Bonus Ordnance and the Transit Oriented Communities. The DEIR does not include details about how specifically it will meet its statutory obligations or the economic benefits it will accrue from various governmental incentive programs. I suggest four general principles be followed as the plans are filled out.

1. Full transparency on the application of the minimum statutory requirements, and the economic benefits and incentives that will be accrued.

2. Different combinations of Very Low Income, Low Income, Affordable housing and of Permanent Supportive Housing can be used to meet and go beyond the bare minimum requirements by law. The developers should convene discussion with knowledgeable local organizations to advise them. This can include the Los Angeles Community Action Network, a respected voice for the unhoused population in Skid Row, and LTSC, a developer of low income and Supportive Housing in Little Tokyo and now in Skid Row at the Crocker Street development.

3. Calculations establish Affordable and Low Income housing rents. Often, "Affordable" housing is not affordable to the people who live in that neighborhood. Given that housing in the Little Tokyo and Arts District was heavily gentrified years ago, using local median income numbers can lead to misleadingly high and unaffordable rents.

4. At their meeting with the Little Tokyo Community Council, the developer expressed a desire to supply low income affordable housing above and beyond the minimum legal requirements. Given the legal requirements are so low, and the numerous financial incentives that are available, a much higher provision should be sought and granted.

Response to Comment No. IND 77-3

This comment offers suggestions for the Project developer to implement in support of the Project's affordable housing component. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 77-4

The environment. By virtue of being close to several freeways, Little Tokyo has some of the worst air quality in the region. The additional traffic, noise and congestion on streets and sidewalks will increase. Little Tokyo has seven churches and temples, some almost next door to Fourth & Central, that appreciate some of the tranquility during the workweek and weekend mornings.

Mitigations. Here are some steps that the developer can do:

1. Include a much higher [sic] of genuinely affordable housing that the minimum required by law.

2. Support and fund measures that enhance the quality of life in the Little Tokyo community. The obstacle to having a much-needed restroom in Little Tokyo has not been construction, but rather the lack of an organization that could provide maintenance. Support for this would be greatly welcomed.

3. Providing some of the ground floor space for community uses. One use could be a neighborhood art gallery, different from high-end galleries, that incorporates existing arts programs in Little Tokyo, the Arts District and Skid Row.

4. Supports for small businesses. The City of San Francisco provides rent subsidies to qualified legal businesses that continue to enhance the meaningful character of their communities. As a Special Purpose corporation, the LTCIF gathers investments to be able to buy properties that can rent at subsidized levels to preserve and retain legacy businesses [sic]

Thank you for this consideration.

Response to Comment No. IND 77-4

This comment generally states that additional traffic, noise, and congestion on streets and sidewalks will increase as a result of the Project. The comment includes suggested mitigation measures to help decrease environmental, as well as social and economic, impacts of the Project. The commenter is referred to Response to Comment No. IND 26-2, which addresses the Project's air quality, noise, and traffic impacts. The comment does not provide substantial evidence supporting the concerns that the Project would cause physical impacts to the environment. Pursuant to CEQA Guidelines Section 15131, CEQA does not treat a project's social and economic effects (such as displacement) as significant environment impacts. As such, no further response is necessary. Nonetheless, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 78

Ichiro Mike Murase
Received December 11, 2023

Comment No. IND 78-1

My name is Ichiro Murase, and I worked in Little Tokyo for over 50 years and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

In 1983, I wrote a book entitled, "Little Tokyo: One Hundred Years in Pictures," still considered by many to be the seminal publication that captures the life of the Little Tokyo neighborhood since its origins in 1884. Now, Little Tokyo is 139 years old, the second oldest continuously-existing ethnic enclave in Los Angeles. Since the forced removal of Japanese Americans during World War 2, efforts to preserve and strengthen this community has been thwarted by "redevelopment" and displacement (e.g. the entire block that Parker Center occupied, the construction of the Regional Connector, just to name two prominent examples). Little Tokyo has been the sacrificial lamb for government buildings, transit station, not to speak of a whole host of privately-developed luxury apartments that changed the character of the neighborhood.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 78-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 78-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 78-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 79

Kevin Onishi
Received December 11, 2023

Comment No. IND 79-1

My name is Kevin Onishi and I am a Little Tokyo stakeholder that is concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have had the privilege of being a part of this Little Tokyo community for a [sic] over 10 years now, and I am very grateful for the efforts of community organizations like Little Tokyo Community Council to ensure that Little Tokyo's best interests are being represented at the local government level.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 79-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 79-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about how construction will impact the quality of life for older adults residing in and around Little Tokyo. I am heavily concerned that, if not planned appropriately, an increased construction presence could simultaneously increase the likelihood of older adult pedestrians and drivers getting in accidents. This will compound the likelihood of diminishing the confidence these older adults have about their safety, which can result in higher levels of social isolation that will be experienced by this specific demographic. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 79-1

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

The commenter also raises concerns about how the Project will impact the quality of life for older adults residing in and around Little Tokyo. With regard to sensitive populations, such as the elderly, refer to Response to Comment No. ORG 2B-29 for a discussion of air quality and noise impacts to sensitive populations.

Additionally, the Project would implement a Construction Management Plan, included as Project Design Feature (PDF) TRAF-PDF-1: Construction Management Plan, in the Draft EIR. The Construction Management Plan will formalize how construction activities will be carried out and identify specific actions that will be required to reduce effects on the surrounding community, inclusive of how construction vehicles would safely access the Project Site. This would effectively ensure the surrounding community, including the senior population, would be safe from construction vehicles. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site.

Pursuant to CEQA Guidelines Section 15131, economic and social effects of a project are not treated as significant effects on the environment under CEQA unless they would lead to a physical impact on the environment.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 80

Sarah Eunyoung Kim
Received December 11, 2023

Comment No. IND 80-1

My name is Sarah Eunyoung Kim and I live in Arts District/Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been a resident of Arts District/Little Tokyo since 2018.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo/ Arts District. The 36 story new development on Mateo/Santa Fe is already an eye sore, and will create ridiculous amount of unsafe traffic in an area not designed for heavy traffic. The proposed Central Project buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 80-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 80-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Arts District/Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 80-1

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 81

Jean Kawakami
Received December 11, 2023

Comment No. IND 81-1

My name is Jean Kawakami and I worship at Los Angeles Hompa Hongwanji Buddhist Temple in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been attending Temple services, funerals, and memorial services at LAHHBT and at other Temples throughout Little Tokyo for the past 30 years, and have been a member of the Board of Directors for LAHHBT for over 10 years. I have also attended community meetings concerning the Little Tokyo Metro project, and the Mangrove workshops.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 81-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 81-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

And for the record, I completely support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 81-1

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 82

Michelle Hirano
Received December 11, 2023

Comment No. IND 82-1

My name is Michelle Hirano and I work at Keirn in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have worked in the Little Tokyo community for over five years, and have been involved in several organizations for over 10 years.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 82-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 82-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about all the program participants the organization I work for, and many other NPOs have in the Little Tokyo area. This disruption would negatively impact the attendees and their experience in our community. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 82-1

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

The commenter also raises general concerns about the participants of non-profit organizations in the Little Tokyo area. Pursuant to CEQA Guidelines Section 15131, economic and social effects of a project are not treated as significant effects on the environment under CEQA unless they would lead to a physical impact on the environment.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 83

Don Tahara
Received December 11, 2023

Comment No. IND 83-1

My name is Don Tahara and I am the owner of Far Bar at 347 E. 1st Street located on the historic First Street North. The Far Bar was formerly Far East Cafe which was an iconic Chinese American restaurant servicing the Little Tokyo community, Civic Center, Boyle Heights and adjoining communities for 50+ years until 1994 earthquake damaged the structural integrity of the building. Far Bar opened in 2006 after numerous years of planning and construction under the guidance of landlord, Little Tokyo Service Center. It was recognized as a national historic building.

The story of Far East Cafe and the current Far Bar epitomizes the struggle of maintaining the original buildings, culture, and businesses in Little Tokyo so current and future generation can learn about the Japanese American history and culture by visiting and participating in their many programs, events, and arts. The cornerstones of Little Tokyo, Japanese American National Museum, JACCC, LTSC, Budokan, and Union Center along with legacy businesses such as Fugetsu-do and Bunkado have enriched the City of Los Angeles.

Response to Comment No. IND 83-1

This comment provides background information about the restaurant, Far Bar, and additional information about business operations in Little Tokyo. The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 83-2

Historic Little Tokyo will suffer from the construction of 4th and Central as its monstrous size will be detrimental to their future:

- Traffic on the Alameda and Central Ave corridors will be impacted as well as east-west traffic on 1st, 3rd, and 4th Streets by the added traffic. This will disrupt access of Little Tokyo and will impact small businesses, churches, temples, and will make it more difficult to attend events and activities at the venues.

- The sheer size of the development is incongruous to the adjacent business and residential buildings.

I support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 83-2

The commenter raises concerns about traffic. The Project's CEQA transportation impacts were evaluated in Section IV.J, *Transportation*, of the Draft EIR, as required by the CEQA and the City of Los Angeles Department of Transportation (LADOT). The Project's impacts from vehicle trips generated by the Project on intersection operations in the Project vicinity are included in Chapter 5, *Non-CEQA Transportation Analysis*, of the Project's Transportation Assessment (TA), included as Appendix J, of the Draft EIR. The results of the analyses of non-CEQA topics and the proposed corrective actions identified in the TA would be addressed through potential Project conditions of approval. Refer to response to Comment No. IND 4A-2 for additional discussion of the Project's CEQA impacts as evaluated in Section IV.J, *Transportation*, of the Draft EIR, and the non-CEQA impacts analyzed in Chapter 5 of the TA.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications. Applicable updates to the CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications would not result in any significant new or substantially increased impacts.

This comment expresses concern about the size and scale of the Project for the immediate surroundings. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment also makes reference of support for a letter provided by LTCC. This letter and responses to the comments provided therein are provided as Comment Letter ORG 2B and Response to Comment Nos. ORG 2B-1 through ORG 2B-42, respectively. As this portion of the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. However, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment Letter No. IND 84

Cindy Lin and Gabriel McCormick
Received December 11, 2023

Comment No. IND 84-1

My husband and I are residents and owners of 222 S Central Ave, Unit 400, just two blocks from the proposed 4th and Central Project ("Project"). We are very concerned about the impacts of the Project on the surrounding areas and how it will negatively affect not just the Little Tokyo area in which we live, but the other neighborhoods adjacent to ours. You'll note that this is not the first time I have written with regards to this project, the previous communication was regarding the short length for the original public comment period. I want to reiterate that point here that this initial comment period was extremely insufficient for allowing ample time to read and respond to the initial Draft EIR. Moving forward, the Department of City Planning and City Planning Commission need to provide a much longer response period to comment on projects such as these which will have a tremendous impact on the area. Especially considering the length of the initial report and that many residents of the neighborhoods do not have the capacity to access, comprehend, and respond to this report, due to a myriad of factors, not least include language comprehension and housing status.

Response to Comment No. IND 84-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses general concerns about the Project negatively affecting the Little Tokyo neighborhood, as well as other neighborhoods. The commenter also states the EIR public review period was insufficient. The original public review comment period was extended by the City to conclude on December 11, 2023. As such, the 61-day public review comment period exceeded the minimum 45-day review period as required by the CEQA Guidelines Section 15105(a) for Draft EIRs submitted to the State Clearinghouse for public review by state agencies. The Project's public review period also exceeded the maximum review period duration of 60 days per Section 15105(a), with such exceedances only permitted when there are unusual circumstances. Refer to Response to Comment No. AG 1B-1 in the Council District 14 comment letter for further discussion of the Project's Draft EIR comment period extension and relevant public review requirements of a Draft EIR per the CEQA Guidelines.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 84-2

Moving onto the actual project report, we are extremely concerned with the gentrification and subsequent displacement the Project would cause, if approved, especially with multiple high-rise mixed-use projects planned for the area, at least one of which the CPC already approved without many of us knowing. The scale of gentrification that is happening in this area is much bigger than before, with all the new massive-scale developments and tower projects planned in the Arts District at designated "Hybrid Industrial" zoning lots following the City-approved DTLA 2040 Community Plan. The City is complicit in playing the role of promoting "revitalization" of the area while it actually brings a massive displacement of the existing established historical community. If this project is approved, it will make it easier for other developers to come in and build high-rises, in other words, continue the precedent of allowing out-of-state developers to swoop in and make enormous, overwhelming changes to our neighborhoods. The location of this Project, taking up a significant part of Skid Row, a neighborhood ubiquitous with houselessness and comprising some of the highest density of unhoused individuals in the city, is especially of concern. Bringing in this kind of development with its accompanying security and optics will inevitably force my unhoused neighbors from one of the locations they have been able to be while driving up rents in and cost of living in the area, which will created the situation for more folks to become unhoused. This is unacceptable. We should be working to lower rents, not bringing in projects it [sic] WILL drive up prices that will have ripple effects across many neighborhoods in Los Angeles.

While the draft Environmental Impact Report states that "no people or housing would be displaced ...because there are no residential uses currently on the Project Site" (pp. IV.H-24), the Project will gentrify the neighborhoods immediately adjacent to it and has the potential to displace the long-time, working-class residents and small businesses who have been a part of their respective communities for several years. This includes the community members of Little Tokyo, Skid Row, the Fashion District, and others. The cumulative impacts of this project on housing in the surrounding areas must be analyzed; it is short-sighted and lacking due diligence to neglect such analysis. The Project's official website claims the Project will provide "dynamic placemaking" and "housing for all," but we know that - although the DEIR does not disclose how many "affordable" housing units will be provided - this development will be exclusive to those who can afford to live in such modern, ritzy high-rises. Moreover, what the developer and politicians choose to ignore is this: Los Angeles already has enough housing to house everyone. The problem is that LA's property is controlled by the capitalists. Empty yet livable property is hoarded by the few in order to generate a profit. Capitalists and landlords profit from the housing crisis.

Continuum Partners' proposed Cold Storage development project at 4th and Central threatens to fundamentally change Little Tokyo and adjacent neighborhoods such as Skid Row and the Fashion District. The project aims to "revitalize the Project Site and the surrounding neighborhood," in other words, allow a developer from Colorado to construct high-rise luxury housing and "creative office space," bring in expensive restaurants, and create heavily surveilled "public" open space off-limits to poor folks. Little Tokyo is already

struggling against gentrification; the Cold Storage project would hasten it and make Little Tokyo unrecognizable. In the last few years, several of our legacy businesses have been forced out due to rent increases by greedy landlords, and many more struggle to stay afloat. Developers, landlords, and other wealthy capitalists are literally stealing Little Tokyo from right beneath our feet, guided only by their greed for money and capital.

My husband and I are demanding that the Depart [sic] of City Planning and the City Planning Commission put the needs of the people over profit and vote NO on approving this project.

Response to Comment No. IND 84-1

This comment expresses general opposition to the Project and concerns regarding gentrifications and displacement. These concerns regarding displacement and gentrification are also expressed in Comment Nos. ORG 1B-10 and ORG 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns. In addition, with regard to nearby and local small businesses, the Project's potential new residents and employees would be expected to increase patronage of these small businesses that the commenter expresses concern about.

With regard to affordable housing, see Response to Comment No. ORG 1B-11, which explains how the Project would comply with Measure JJJ. Also, with regard to the number of housing units available in the City, in accordance with SCAG's Regional Housing Needs Assessment (RHNA) Allocation Plan, adopted in March 2020, the City's 2021-2029 Housing Element must accommodate a total of 456,643 units, of which 184,721 units must be affordable to lower income households (Very Low and Low).[41] As of April 1, 2024, there was a remaining RHNA allocation of 404,605 units in the City. Thus, the City has yet to meet the required RHNA allocations, and the Project would contribute to meeting the required RHNA allocations. As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

[41] Low income is defined in California Health and Safety Code Section 50079.5. Very Low Income is defined in California Health and Safety Code Section 50105.

Comment Letter No. IND 85

David Ikegami
Received December 11, 2023

Comment No. IND 85-1

We wish to support the Fourth & Central Draft Environmental Impact Report (DEIR). As real estate developers with an established track record of projects adjacent and in proximity to this one, we feel it will add positively to the local area and community.

Established in 1976, Taira Investment Company, LLC is a real estate development and investment firm with completed Industrial BID development projects at 333 So. Alameda Street adjacent to the subject property as well as 420 E. 3rd Street a few blocks west.

We believe that the adjacent Little Tokyo community will also be positively impacted by this development and its creation of 1,521residential units both market rate and affordable, 400,000 square feet of office space as well as 68 hotel rooms.

As long time community developers, it is our hope to work with real estate developer Mark Falcone of Continuum and long-time warehouse owner and our former neighbor Larry Rauch of LA Cold Storage as each phase of the project progresses. Through thoughtful community engagement and input we believe that this project can be a wonderful addition to the eastern area of downtown.

Response to Comment No. IND 85-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 86

Traci Kato-Kiriyama
Received December 11, 2023

Comment No. IND 86-1

My name is traci kato-kiriyama [sic] and I work at and with various organizations in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been a Little Tokyo stakeholder from the time I was a child (frequently participating in arts & cultural events, community meetings and conferences, and later as an intern and staff of JANM and LTSC), and continue to serve as the Director/Co-Founder of Tuesday Night Project. Our flagship program, the Tuesday Night Cafe series, is hosted at the Aratani Courtyard of the Union Center for the Arts on Judge John Aiso Street. We just finished our 25th year of programs and continued partnerships and are the longest-running Asian American free public arts series in the country.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 86-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration. Further, the commenter's involvement in various local organizations and recognition as a stakeholder in Little Tokyo is acknowledged by the City.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 86-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the continued lack of and fight for self-determination and respect and collective control over our neighborhood. I also support the letter submitted to the City by the Little Tokyo Community Council. I hope to hear back from you and look forward to open dialogue that includes our community who made Little Tokyo a favored location that garnered your attention.

Response to Comment No. IND 86-2

This comment raises a list of concerns included in Comment No. IND 26-2 and expresses safety concerns for pedestrians and cyclists. Refer to Response to Comment Nos. IND 26-2, as well as Response to Comment Nos. ORG 2B-15, ORG 2B-16, and ORG 2B-22, which address pedestrian and bicycle safety. This comment also expresses a general concern about the continued lack of and fight for self-determination and respect and collective control over her neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

This comment also makes reference to support for letters provided by LTCC. This letter and responses to the comments provided therein are provided as Comment Letter ORG

2B and Response to Comment Nos. ORG 2B-1 through ORG 2B-42, respectively. As this portion of the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is necessary. However, the comment is noted for the record and will be forwarded to the decision-makers for their review and consideration prior to any action on the Project.

Comment Letter No. IND 87

Nancy Uyemura
Received December 11, 2023

Comment No. IND 87-1

My name is Nancy Uyemura, and I live at 222 So. Central Ave. in Little Tokyo and am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

I have been a resident in the area for close to 40 years and have worked in the area for just as long. I am also a stakeholder and participate in many activities in this community as well.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 87-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 87-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about mental health of all the people that live and work and frequent Little Tokyo - it will no longer be our 'Home' and will just be another nail in the coffin so to speak to get rid of the Japanese community that has already suffered so much because of the gentrification that has and is still taking place. I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 87-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment expresses general opposition to the Project and concerns regarding gentrifications and displacement. These concerns regarding displacement and gentrification are also expressed in Comment Nos. ORG 1B-10 and 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns. Also, with regards to the concern relating to the mental health of the Little Tokyo community, while this is not an issue under the purview of CEQA, the concern is noted for the record.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 88

Nicole Oshima
Received December 11, 2023

Comment No. IND 88-1

My name is Nicole Oshima, and I live near Little Tokyo as well as volunteer, shop, and participate in community and cultural events in the space. I am concerned with the present and future betterment of the Little Tokyo community. During this public comment time, I am writing concerning the 4th and Central Project located adjacent to Little Tokyo, which is a large development covering over 7.5 acres and encompassing several buildings of different heights, with the tallest standing at forty-four stories.

Since I was born in 1998, I have been a frequent visitor to Little Tokyo. I worked at LTSC and the Terasaki Budokan, as well as was active in community service, college organizing, and community events throughout my entire 25 years of life. My grandparents and parents are also frequent volunteers, dedicating decades of their life to the space and upkeeping the cultural integrity of our community.

I am very concerned about the size and heights of these buildings, which are completely out of scale with the existing and surrounding low-rise development in Little Tokyo. The proposed buildings will change the character of our neighborhood and overshadow the nearby area residents, businesses, other organizations and religious institutions.

Response to Comment No. IND 88-1

The commenter's identification as a stakeholder in Little Tokyo is acknowledged by the City. This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the Little Tokyo setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 88-2

In addition, I am concerned about the proposed Project's construction impacts, including noise, traffic, and air quality issues, which will be felt by all nearby stakeholders, especially folks living, working, worshiping, and visiting Little Tokyo.

These significant impacts include:

- Construction along with noise and debris/dust/pollution emissions
- Increased traffic and air pollution emissions along Alameda, Central, 3rd and 4th Streets
- Safety concerns for pedestrians and cyclists along with disruptions to nearby residents
- Disruptions to local businesses, especially small, family-owned and legacy businesses
- Disruptions to the historic and cultural Little Tokyo neighborhood

In addition to the above, I am concerned about the effect that this will have on future generations and my own generation of Japanese Americans. We value the space, it is our home, and I also support the letter submitted to the City by the Little Tokyo Community Council.

Response to Comment No. IND 88-2

This comment includes the same list of construction-related concerns and support of the comment letter submitted by LTCC included in Comment No. IND 29-2. Refer to Response to Comment No. IND 29-2, which addresses these comments.

This comment also expresses a general concern about the effect of the Project on future generations and the commenter's own generation of Japanese Americans. Concerns regarding displacement and gentrification are discussed in Comment Nos. ORG 1B-10 and 1B-11. Refer to Response to Comment Nos. ORG 1B-10 and ORG 1B-11, which address these concerns.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, they are noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 89

Andrea Taylor
Received December 11, 2023

Comment No. IND 89-1

I just came across this proposal for the 4th and Central Cold Storage project and I know that I'm sending this past the 4pm deadline, but I hope you'll accept my letter.

I am not opposed to development in and around the Arts District. BUT, these high rise building projects are just totally out of character with the historic nature in this district where warehouses have been the predominant architectural structure for over I 00 years.

Response to Comment No. IND 89-1

This comment expresses concern about the size and scale of the Project for the immediate surroundings, with the Project being out of scale with the existing setting. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, please refer to Section III*, Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which includes design modifications made to the Project in response to public and agency comments received on the Draft EIR.

Comment No. IND 89-2

Beyond the visual, this area isn't structurally built for mega traffic and a mega population that would be here 24 hours a day. Look at the streets-they're already a mess-filled with potholes and in desperate need of repair from the development we have now!

Response to Comment No. IND 89-2

The comment raises concerns about traffic. The Project's CEQA transportation impacts were evaluated in Section IV.J, *Transportation*, of the Draft EIR, as required by the CEQA and the City of Los Angeles Department of Transportation (LADOT). The Project's impacts from vehicle trips generated by the Project on intersection operations in the Project vicinity are included in Chapter 5, *Non-CEQA Transportation Analysis*, of the Project's Transportation Assessment (TA), included as Appendix J, of the Draft EIR. The results of the analyses of non-CEQA topics and the proposed corrective actions identified

in the TA would be addressed through potential Project conditions of approval. Refer to response to Comment No. IND 4A-2 for additional discussion of the Project's CEQA impacts as evaluated in Section IV.J, *Transportation*, of the Draft EIR, and the non-CEQA impacts analyzed in Chapter 5 of the TA.

In addition, refer to Appendix F of this Final EIR for a discussion of transportation impacts related to the Project with design modifications. Applicable updates to the CEQA analyses for the Project with design modifications are included in Section III, *Revisions, Clarifications and Corrections to the Draft EIR*, of this Final EIR, which indicate the Project with design modifications will not result in any significant new or substantially increased impacts.

Also, with regard to roadway conditions, it is understood that service and infrastructure facilities age and need replacement over time. However, the routine repair or replacement of older infrastructure facilities would not be a CEQA impact resulting from the Project and is not addressed in the Draft EIR.

In addition, the Draft EIR addressed population impacts in Section IV.H, *Population and Housing*. The analysis therein concluded that impacts related to population growth under the Project would be less than significant.

As this comment does not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. IND 89-3

I can also predict that this overdevelopment will most likely result in empty units whether they are for residential or commercial use. Just look around this neighborhood now and see the empty real estate that was created for commercial use. It's a blight on the neighborhood and depressing to walk by. Some of it was empty for years and now has tenants, but not the tenants that were expected to move in. You see and feel the promise of retail stores and movie theaters never happened. I am happy that restaurants have come in and some of the smaller buildings have been properly developed, but I can't see filling the thousands of units that are going up. It needs to be controlled. This is supposed to be the job of the city, to make sure that overdevelopment doesn't take it's toll and destroy what is wonderful.

Development is great, but 44 story buildings have no place here... keep it under 15 please. The area will thrive and developers can still charge the crazy prices they want.

Please help keep all the development under control. Don't tum this area into an extension of downtown. Keep it a special area with fewer high rises that are a blight on the landscape and more architecturally interesting structures that contribute to LA's design and Arts District.

Response to Comment No. IND 89-3

This comment raises general concerns about the Project and its ability remain close to occupancy for its proposed uses, as well as its proposed height at 44 stories. Refer to Response to Comment No. ORG 1B-13, which discusses the Project's size and compatibility with the surrounding Project vicinity. Also, refer to Response to Comment No. ORG 2B-6, which addresses the Project's compatibility with the Little Tokyo historic neighborhood.

As these comments do not provide substantial evidence supporting the concerns raised or with respect to the content or adequacy of the Draft EIR, no further response is necessary. Nonetheless, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

In addition, note that as discussed in Response to Comment No. IND 89-1, modifications have been made to the Project top reduce the height of Building 2 (on the North Site) from 44 stories to 30 stories.