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FINAL ENVIRONMENTAL IMPACT REPORT

CORNFIELD ARROYO SECO SPECIFIC PLAN

VOLUME II of III

This document, together with the Original DEIR, the Recirculated Portions DEIR, and their appendices comprises the Final EIR as required under the California Environmental Quality Act

Cornfield Arroyo Seco Specific Plan

ENV-2009-599-EIR

CPC-2009-598-SP

State Clearinghouse No. 2009031002

Council District 1

Project Location: The Plan is located entirely within Los Angeles City Council District One, and comprises portions of the Central City North, Northeast, and Silverlake-Echo Park Community Plan areas. The Plan includes two of the opportunity areas identified in the Los Angeles River Revitalization Masterplan—the Cornfield and Arroyo Seco (City of Los Angeles 2007b).

Project Description: The project, which is the Cornfield Arroyo Seco Specific Plan, guides the future development of an approximately 660 acre area. The Plan is intended to transform an underserved and neglected vehicular-oriented industrial and public facility area into a cluster of mixed-use, pedestrian oriented and aesthetically pleasing neighborhoods. The Plan is also intended to maintain and enhance the concentration of jobs, provide a range of housing choices, provide shops and services for everyday needs, increase access to open space, reduce per capita water and energy use, and lessen dependence on the automobile by facilitating pedestrian and transit mobility and encouraging bicycle use. To facilitate the realization of these goals the Plan includes the designation of new mixed-use zoning districts that will expand the range and intensities of permitted uses, establish building height, massing, façade, open space and conservation standards, while also requiring the provision of unbundled parking, reducing parking requirements, expanding bicycle parking standards, establishing transportation demand management strategies, implementing new street and urban design standards, and providing access to a variety of transit options including frequent light rail and bus connections, shared vehicles and bicycles, and taxis. For complete details of the project please refer to the complete draft of the Plan at: <https://sites.google.com/site/cornfieldsla/>

PREPARED BY:

Los Angeles Department of City Planning

August 2012

**CORNFIELD ARROYO SECO SPECIFIC PLAN
FINAL ENVIRONMENTAL IMPACT REPORT**

RESPONSE TO COMMENTS

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3.0 RESPONSES TO COMMENTS

Section 15088 of the CEQA requires the Lead Agency (Los Angeles Department of City Planning) to evaluate comments on environmental issues received from public agencies and interested parties who review the Original DEIR and/or RP-DEIR and prepare written responses. This Chapter provides written either a Master or Specific response to all comments received on the Original DEIR and RP-DEIR.

In Chapter 2, comment letters and specific comments are given specific numbers for reference purposes. This Chapter presents complete responses, numbered to correspond to each specific comment identified within the body of each letter in Chapter 2. In Chapter 4 (Corrections and Additions), changes to the Original DEIR and/or RP-DEIR text, made in response to comments from this Chapter 3, or as initiated by staff, are shown.

Master Response

A number of comments on the topic of housing displacement make a common claim, so rather than respond to each comment individually, this FEIR presents a single Housing Displacement Master Response 1.

MR-1 Housing Displacement

Several comment letters allege that the Proposed Alternative fails to provide policies or incentives to include affordable housing, which will result in housing displacement both within the project Area, and the surrounding area.

Displacement impacts to on-site population

Several comments have expressed concern that new housing and development would lead to the removal of existing residential units in the Project Area, and subsequent displacement of the residential population currently living within the site. Page 36 of the Review of the Transportation Element of the Cornfield Arroyo Seco Specific Plan (CASP) and Redevelopment Plan prepared by Minagar and Associates assumes that the Specific Plan will result in the removal of all housing units in the Specific Plan boundaries displacing between 6,000 and 7,000 residents currently living on site, and expresses that the DEIR be revised to address the “worst case” conditions.

As of 2007 the Project Area consisted of a total of 1,814 units of which approximately 43 percent are dedicated affordable housing units. The commenter fails to mention that of the total dedicated affordable housing commitments, approximately 53 percent is currently committed by a state-chartered public agency, and the other 47 percent have been constructed within the last 10 years and have recorded 50 year covenants with the City to provide the affordable units. The comment also fails to mention that of the total housing in the Project Area, approximately 23 percent reside in an area where there is no change proposed to the land use designation or zoning and would have no incentive to redevelop as a result of less restrictive development standards.

As mentioned above, approximately 412 units or 53 percent of the dedicated affordable housing in the Project Area is provided by William Mead Homes. William Mead Homes is part of the Housing Authority of the City of Los Angeles (HACLA) Public Housing Program, where the residents' rent is subsidized by the federal government. HACLA is committed to long-term operations and management of these affordable units. The current R3 zoning permits a maximum of approximately 975 units to be developed on the approximately 18 acre site. The site could be potentially redeveloped under the Urban Village designation, as permitted under the Project Alternative, at the base 2.5:1 FAR and could result in a maximum of 1,756,339 sq. ft. of residential development, or approximately 1,463 units (if developed at an average 1,200 sf per unit), yielding a much higher potential of affordable housing than currently exists today. In addition, if the redevelopment would include a significant affordable housing component, the site could be given a Density Bonus Option incentive to develop at a 4:1 FAR availing substantially more affordable units than exist today. While there is no current proposal to redevelop William Mead Homes, it is undergoing a feasibility study that includes a physical needs assessment to determine the long-term viability of the physical structures.¹ If it is determined that the William Mead site would be redeveloped, it is reasonable to assume that potential redevelopment of the site would be consistent with other HACLA Public Housing Program sites such as the Jordan Downs Project, where affordable units were replaced on a 1:1 basis onsite in addition to providing market rate housing.

To further encourage residential projects to include units that are affordable to extremely low, very-low, and/or low-income households, the Proposed Alternative has been revised to include a Density Bonus Option for both Publicly Funded and Not Publicly Funded projects (Revised Proposed Alternative). The Density Bonus Option provides additional floor area to projects that voluntarily include restricted affordable units and provides projects the opportunity to utilize On or Off-Menu Incentives that may further assist a project to include affordable units. As the inclusion of the Density Bonus Option would incentivize the production of affordable units, the Project Alternative would not result in the disproportionate production of market rate units in the Project Area. See Section 5 of the FEIR for a description of the Revised Proposed Alternative Density Bonus Option.

Therefore, in consideration of both the long-term nature of the affordable housing commitments and the preservation of the existing land use designations in a portion of the Project Area, the redevelopment incentives offered by the land use designations in the Proposed Alternative would not directly displace a substantial amount of affordable housing units within the Project Area.

Displacement impacts to off-site housing

Several comments suggest higher displacement risk for the area surrounding the Specific Plan given the higher percentage of renters. One comment cites several journal articles that demonstrate the correlation of increasing housing prices in transit-rich areas.

Concerns that the Specific Plan would result in higher increases in rent by landowners seeking a greater return of their rental property do not account for the limitations imposed by the City's

¹ Interview with HACLA staff, April 13, 2012

Rent Stabilization Ordinance (RSO), which limits annual rent increases (rent control) on properties with 2 or more units built before October 1, 1978. The purpose of the RSO is to allow landlords a reasonable return on their investments while protecting tenants from excessive rent increases. For units where the RSO limits rent adjustments, rent increases occur annually based on changes in the Consumer Price Index. The annual allowable rent increases for RSO units are required to be no less than 3 percent and no more than 8 percent, not including certain exemptions such as percentage cost recovery for rehabilitation/renovation work or capital improvements. The allowable annual rent increase has not exceeded 5 percent since 1985.² Therefore, City regulations in place provide some protection to current residents against potential displacement impacts as the result of the Specific Plan.

Units under rent control are not protected from rent increases after the tenant leaves, and when a tenant moves out of a rent controlled apartment, the unit is rented to a new tenant without a restriction on the initial rent under the new lease (decontrol). However, the voluntary move from a RSO unit is not considered displacement, as this would not be a result of increased rents, but other choices that motivate residential occupancy patterns.

The fact that rent adjustment limitations do not apply to rental units that were issued a Certificate of Occupancy after October 1978 may support an assumption that a substantial number of tenants who occupy units built after 1978 could be subject to displacement. However, 2010 Census data shows that 87.8 percent of the housing units in the Study Area (defined as Census Tracts 1853.20, 1990, 1997, and 2060.10) were built before 1980, indicating that most tenants living just in and around the Project Area are protected by the RSO, and would not be subject to the displacement concerns brought by the comments.

In addition to renter occupied housing, the comments may be suggesting that the Specific Plan may also have the unintended consequence of displacing owner-occupied households who may be subject to and unable to afford higher property taxes as the result of development activity. However, owner-occupied units are subject to Proposition 13, which restricts the annual increases of assessed value of real property to an inflation factor, not to exceed 2% per year, and would therefore also not be to the displacement concerns brought by the comments.

Transit participation in the Project Area

Some of the comments have stated the observed trend verified by research through the Dukakis Center for Urban and Regional Policy (Pollock et al., 2010)³ of higher transit participation of low-income residents, renters and people of color and allege that the Proposed Alternative will result in the displacement of a transit dependant population with higher income residents less likely to use transit (See Comment 27-22, 27-56, 27-75 and 27a-28). Comment 27-75 references 2000 U.S. Census Bureau commuting data that verifies that 15 percent of people in the Project Area take transit to work, while 25 percent took other non-automobile means, amounting to a 40 percent total non-auto commute mode. See Response to Comment 27-75 of existing and projected VMT and transit participation rates in the Project Area. The comments suggest that the

² Los Angeles Housing Department website. Landlord-Tenant Handbook <http://lahd.lacity.org/lahdinternet/Portals/0/Rent/Body%20of%20%20Handbook%207-10.pdf> (accessed on 4/24/12)

³ Pollack, S., Bluestone, B., Billingham, C. (2010) *Maintaining Diversity in America's Transit-Rich Neighborhoods: tools for Equitable Neighborhood Change*. Dukakis Center for Urban and Regional Policy (Pollock et al., 2010)

Proposed Alternative will result in higher vehicle miles traveled (VMT) and in turn result in a significant contribution to increased GHG emissions (See Comment 27-56).

The Dukakis Center research findings in *Maintaining Diversity in America's Transit-Rich Neighborhoods* demonstrates that an influx of higher income people is associated with higher auto mobile ownership, and are less inclined to rely on transit as a regular transportation option.⁴ In Chapter 4 of the same policy paper, the authors present a host of policy tools (Policy Toolkit for Equitable Transit-Rich Neighborhoods) to mitigate the undesirable consequences of transit investment. Some of the policy tools described that specifically address higher income household commute patterns include discounting transit passes to residents, decreasing the amount of parking supply (through either elimination of minimum parking requirements, establishing a maximum parking requirement, and/or unbundling parking from the dwelling unit by sale or lease), and the provision of car sharing programs. Mitigation Measure Transportation 1 in Pages 4-46 through 4-48 of the Original DEIR details the transportation demand management (TDM) strategies that have been proposed in the Project Alternative to reduce vehicular trips and encourage the use of transit, walking, and biking. A part of the TDM strategy includes the requirement of employers to subsidize transit passes for employees. In response to the comments and review of research findings, the TDM strategies in Mitigation Measure Transportation 1 has been revised to include required participation of new residential uses of over 50 units to participate in a discounted transit pass program. Another TDM strategy in Mitigation Measure Transportation 1 also requires all new projects to unbundle the cost of parking from the cost of living by either by charging a rent or lease fee, or selling the parking space separately. The Proposed Alternative also includes parking maximum requirements of no more than one space per dwelling unit for all new residential uses, and no more than one space for every 1,000 square feet for non-residential uses. The Proposed Alternative also incentivizes the establishment of car share programs by requiring new projects to dedicate one shared vehicle parking off-street space for every 25 units and/or 25,000 square feet, and by awarding car share vehicles priority access to on-street parking spaces. See Corrections and Additions to changes to Mitigation Measure Transportation 1. As the Proposed project incorporates all the recommendations of the Policy Toolkit for Equitable Transit-Rich Neighborhoods designed to attract transit participation from higher income residents, new residents would be expected to have similar transit ridership as the existing population in the Project Area.

⁴ Ibid. (pg. 24-26)

Specific Responses to Comment Received on the Original DEIR

1. Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, Scott Morgan, Director, June 2, 2011

1-1 The letter from the State Clearinghouse indicates that comments were received from state agencies, and that the Planning Department has complied with State Clearinghouse review requirements for a Original DEIR pursuant to CEQA. The comment is noted, and no response is necessary.

2. South Coast Air Quality Management District, Ian MacMillan, Program Supervisor, November 18, 2011

2-1 The comment noted regarding the potential health risk impact from placing sensitive receptors in proximity to toxic air contaminant (TAC) emission sources. The Air Quality discussion on potential health risk impacts from poor air quality due to proximity to freeway, industrial and rail yard sources has been revised and recirculated in the RP-DEIR on May 31st, 2012 to address this impact. See Response to Comment 2-5 and 2-6 and Section 2.A-I of the RP-DEIR for the revised analysis of potential health risk impacts.

2-2 The comment noted regarding the evaluation of TAC emission sources and the need to provide mitigation. Existing TAC sources have been identified using SCAQMD FINDs data, reviewing the Los Angeles Transportation Center (LATC) Health Risk Assessment (HRA), as well as applying the criteria of the California Air Resource Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*. The Air Quality discussion on potential health risk impacts from poor air quality has been revised and recirculated in the RP-DEIR on May 31st, 2012 to identify potential TAC sources, and mitigation measures to reduce potential health impacts to the extent feasible. For example, the Air Quality Mitigation Measure 2 was revised to increase buffer distance to 500 feet between the freeway and future sensitive receptors.

The recommendation to implement the use of buffers between industrial TAC sources or freeways and sensitive receptors in accordance with the CARB Air Quality and Land Use Handbook is noted and shall be forwarded to the decision maker. For more detailed response, see Response to Comment 2-5 and 2-6 and Section 2.A-I of the RP-DEIR for the revised analysis of potential health risk impacts. Original DEIR

2-3 Comment is noted on the need to conduct a localized construction air quality analysis. The section of the Original DEIR that addresses construction Localized Significance Threshold (LST) air quality analysis has been revised and recirculated in the RP-DEIR on May 31st, 2012. As part of the RP-DEIR, Mitigation Measure Air Quality 12 was added to reduce localized construction impacts to the extent feasible. See Response to Comment 2-7 and 2-8, and Section 2.A-III of the RP-DEIR for the revised analysis of localized construction air quality impacts. 2-4 The comment is noted regarding the need to provide

additional mitigation measures to reduce impacts to regional construction air quality. A portion of the Air Quality Section has been revised and recirculated in the RP-DEIR on May 31st, 2012 to disclose significant, and unavoidable regional construction air quality impacts. As part of the RP-DEIR, Mitigation Measure Air Quality 3 which reduces construction related PM emissions was renumbered as Mitigation Measure Air Quality 11. In addition Mitigation Measure 12 was added to include performance standards to reduce localized construction related criteria air pollutants to the extent feasible in accordance with CEQA Guidelines Section 15126.4(a)(1)(B). See Response to Comment 2-9, and Section 2.A-II of the RP-DEIR for the revised analysis of regional construction air quality impacts.

- 2-5 The comment is noted regarding the potential health risk impact from placing sensitive receptors in proximity to toxic air contaminant (TAC) emission sources. The EIR is a programmatic document and there are no specific development projects proposed at this time. Methodological inputs about specific site location and orientation of TAC sources, and sensitive receptor locations, emission profiles and local meteorology are a few of the factors required for an HRA to produce a quantitative health risk impact conclusion.⁵ Performing a quantitative analysis to determine the significant health risk impact to future residents could only be conducted at the time of the development of a specific project. However, as stated in the RP-DEIR, existing TAC emitting sources, such as freeways, industrial uses, and major railyard operations, are either in proximity or within the Project Area that could potentially result in a health risk impact to future sensitive receptors. Because sensitive receptors would potentially be permitted in proximity to TAC sources under the siting distances to industrial uses prescribed in the CARB Air Quality and Land Use Handbook, the discussion of health risk impacts related to TAC sources was revised to be considered significant and unavoidable, and this section was recirculated on May 31st, 2012 for public review pursuant to Section 15088.5 of the CEQA Guidelines. Therefore, to be conservative, the analysis has been revised and recirculated to conclude a significant and unavoidable health risk impact due to siting sensitive receptors next to sources of TAC emissions. See Section 2.A-I of the RP-DEIR for the revised analysis of potential health risk impacts.

The revised analysis identified existing TAC sources within the Project Area using SCAQMD FINDs data), as well as applying the criteria of the California Air Resource Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*. In addition, the revised analysis specifically addresses the LATC railyard and describes the findings of the LATC HRA and efforts underway identified in the LATC Mitigation Plan to reduce diesel particulate matter (DPM) emissions.

As to the comment regarding permitting residential uses next to the I-5 Freeway, Mitigation Measure Air Quality 2 has been revised in the RP-DEIR to include the 500-foot siting distance from freeway sources recommended by CARB unless an HRA is conducted to determine that the buffer is not necessary to reduce cancer and non-cancer

⁵ CAPCOA. 2009. Health Risk Assessment for Land Use Projects.

risks from freeway TAC sources. In addition, Mitigation Measure Air Quality 3 through 10 have been added to reduce impacts from non-freeway TAC sources such as the existing industrial facilities in the Project Area and the LATC railyard. Such measures include installation of air filtration systems and planting a vegetated screen for new residential uses within recommended buffer distances to TAC sources.

Furthermore, as discussed in Section 2.A-I of the RP-DEIR, the implementation of stricter regulatory requirements and technological improvements are substantially reducing TAC sources over time, such as DPM, while modern construction standards and mitigation measures for new residential uses will improve indoor air quality conditions as compared to existing sensitive land uses that are in close proximity to TAC sources in the Project Area. In addition, the land use configurations encouraged as a result of the Proposed Alternative, such as better bicycle and pedestrian infrastructure and the ability to live in proximity to employment centers, could lead to overall improvements in healthy life style choices that could counter the effects of poor air quality over time. See Section 2.A-I of the RP-DEIR.

- 2-6 The comment asserts the Original DEIR requires an HRA for projects that include placing sensitive receptors within 300 feet of a freeway, but failed to define what constitutes an “acceptable” HRA. As stated in Response to Comment 2-5, Mitigation Measure Air Quality 2 has been revised to include the 500-foot siting distance from freeway sources recommended by CARB unless an HRA is conducted to determine that the buffer is not necessary to reduce cancer and non-cancer risks from freeway TAC sources. In response to the request to define a “acceptable” HRA or demonstrate its effectiveness, the Mitigation Measure Air Quality 2 specifies in instances where sensitive land uses are proposed within the 500 foot siting distance, that the HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the SCAQMD, and the HRA is required to demonstrate that the incremental cancer risk is below one in one hundred thousand (1.0E-05), or the appropriate non-cancer hazard index is below 1.0. See Section 2.A-I of the RP-DEIR.

In response to the comment that the Original DEIR does not provide a quantitative HRA, see Response to Comment 2-5 above.

In response to the comment that Mitigation Measure Air Quality 2 fails to account for potential health risk impacts from non-freeway industrial TAC sources, Mitigation measure Air Quality 3 through 10 have been added to reduce impacts from both freeway and industrial TAC sources such as the existing industrial facilities in the Project Area and the LATC railyard. Such measures include installation of air filtration systems and the planting of vegetated screens for new sensitive land uses within recommended buffer distances to TAC sources.

The recommendation to implement the use of buffers between industrial TAC sources or freeways and sensitive receptors in accordance with the CARB Air Quality and Land Use Handbook is noted and shall be forwarded to the decision maker. As stated in Response to Comment 2-5, because sensitive receptors would potentially be permitted in proximity

to TAC sources under the siting distances to industrial uses prescribed in the CARB Air Quality and Land Use Handbook, the discussion of health risk impacts related to TAC sources was revised in the RP-DEIR to be considered significant and unavoidable, and recirculated on May 31st, 2012 for public review pursuant to Section 15088.5 of the CEQA Guidelines.

The recommendation to only permit residential projects or other sensitive land uses shown to have less than significant health risk impact pursuant to a HRA in locations that are less than the buffer distances recommended in accordance with Table I-1 of the CARB Air Quality and Land Use Handbook shall be forwarded to the decision maker. In accordance with Section 15092 of the CEQA Guidelines, it is within the discretion of the Lead Agency to approve a project that is shown to have a significant impact on the environment if the Lead Agency has “eliminated or substantially lessened all significant effects on the environment where feasible...” and “determined that any remaining significant effects on the environment found to be unavoidable... are acceptable due to overriding concern.” Mitigation measures Air Quality 2 through 10 are incorporated to reduce health risks to future sensitive receptors to the maximum extent feasible. While some of the measures, such as implementation of air filtration systems in residential buildings have been shown to substantially reduce DPM (which constitutes the largest percentage of TAC emissions), it cannot be determined at this time whether they will reduce impacts to less-than-significant levels. A statement of overriding considerations will need to be adopted as a requirement of approval of the Proposed Alternative. In addition, as discussed in Section 2.A-I of the RP-Original DEIR, the implementation of stricter regulatory requirements and technological improvements are substantially reducing TAC sources over time, such as DPM, while modern construction standards and mitigation measures for new residential uses will improve indoor air quality conditions as compared to existing sensitive land uses that are in close proximity to TAC sources in the Project Area. As such, the Lead Agency may find that the land use configurations encouraged as a result of the Proposed Alternative, such as better bicycle and pedestrian infrastructure and the ability to live in proximity to employment centers, could lead to overall improvements in healthy life style choices that could counter the effects of poor air quality over time. See Section 2.A-I of the RP-DEIR.

The recommendation that future project that requires an HRA shall prepare the necessary CEQA document pursuant to the Public Resource Code 15168(c), and to place the SCAQMD on future notice shall be forwarded to the decision maker. A portion of the Air Quality Section Original DEIR was recirculated in the RP-DEIR on May 31st, 2012 to state that significant and unavoidable health risk impacts may occur as a result of placing sensitive land uses in proximity to TAC emitting sources. Mitigation measures Air Quality 2 through 10 shall be incorporated into the Specific Plan development standards in order to reduce health risks to future sensitive receptors to the maximum extent feasible in accordance with Section 15168(c)(3) of the CEQA guidelines. See Section 2.A-I of the RP-DEIR.

- 2-7 The comment is noted on the need to conduct a localized construction air quality analysis to determine impacts to residents in the Project Area. The section of the Original DEIR that addresses construction LST air quality analysis has been revised and recirculated in

the RP-DEIR on May 31st, 2012. As part of the RP-DEIR, Mitigation Measure Air Quality 12 was added to reduce localized construction impacts to the extent feasible. See Section 2.A-III of the RP-DEIR for the revised analysis of localized construction air quality impacts.

The comment also notes that the Original DEIR did not quantify peak daily emissions from site specific projects and that the SCAQMD's thresholds for such emissions should be applied in making a significance determination regarding such emissions. The EIR is a programmatic document and there are no specific development projects proposed at this time, so the quantification of peak daily construction emissions from site specific projects would be remote and speculative. However, air quality analysis related to regional construction emissions has been revised and recirculated in the RP-DEIR on May 31st, 2012. Table 2.A-1 was included as part of the revised analysis, which discloses peak construction emissions from construction activities, as computed using CalEEMod. Criteria air pollutant peak daily emission values were compared to SCAQMD's regional mass based emissions thresholds. The analysis concluded that peak emissions levels of Reactive organic gases (ROG), Oxides of Nitrogen (NO_x), Carbon Monoxide, and PM₁₀ would exceed the SCAQMD thresholds and amount to a significant and unavoidable impact after the incorporation of feasible mitigation measures. See Section 2.A-II of the RP-DEIR for the revised regional construction air quality analysis.

- 2-8 The comment is noted on the need to quantify daily construction emissions from the proposed Alternative, apply the SCAQMD's localized significant thresholds and incorporate mitigation measures. See Response to Comment 2-7 related to revised regional construction air quality analysis and the application of localized significant thresholds. Also, see Section 2.A-II of the RP-DEIR for the revised regional construction air quality analysis and Section 2.A-III of the RP-DEIR for the revised analysis of localized construction air quality impacts.

The comment requests that new projects located in the Project Area shall conduct a localized construction emission analysis and mitigate to below the level of significance. As stated on Page 2.A-27 of Section 2.A-III of the RP-DEIR, the Specific Plan is a regulatory document and does not establish a specific sequence under which specific project developments will be constructed. Therefore, there is no reasonable means to determine if an impact of one project in the Project Area will result in a significant localized construction air quality impact to an existing or future sensitive receptor. In the preface of the SCAQMD's Final LST Methodology (SCAQMD, 2008), the report authors state that "the LST methodology was developed to be used as a tool to assist lead agencies to analyze localized impacts associated with project-specific level proposed projects... and are not applicable regional projects such as General Plans." In addition, Section 15145 of the CEQA Guidelines states that 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.

Due to the magnitude of potential emissions from all cumulative construction activities, and the addition of sensitive receptors beyond those existing in the Project Area, it is reasonable to assume that construction air quality emission impacts for projects permitted

by the Proposed Alternative would exceed the LST levels relevant to the specific projects. Therefore, LST air quality analysis has been revised and recirculated in the RP-DEIR on May 31st, 2012 to disclose that air quality impacts due to localized construction emissions would be significant and unavoidable, albeit temporary. Mitigation Measure Air Quality 12 was incorporated to ensure that emissions would be reduced to less than the maximum extent feasible. See Section 2.A-III of the RP-DEIR for the revised analysis of localized construction air quality impacts.

The recommendation that future projects that require a localized construction emissions analysis shall prepare the necessary CEQA document pursuant to the Public Resource Code 15168(e), and to place the SCAQMD on future notice shall be forwarded to the decision maker.

2-9 The comment recommends that further mitigation be incorporated into the EIR to address significant construction air quality impact as a result of VOC and NOx emissions. The portion of the Air Quality Section that addresses air quality construction emissions and mitigation has been revised and recirculated in the RP-DEIR on May 31st, 2012. The mitigation recommended by SCAQMD in this comment letter was incorporated as Mitigation Measure Air Quality 12. See Section 2.A-III of the RP-DEIR for the description of Mitigation Measure Air Quality 12.

3. Community Redevelopment Agency of the City of Los Angeles, Jenny Scanlin, Acting Regional Administrator II, November 22, 2011

3-1 The commenter notes that the Proposed Alternative is sometimes referred to as the Specific Plan only whereas the No Redevelopment Plan Alternative is in fact the alternative that includes only the Specific Plan and does not include the development of a redevelopment project area. Clarifications to the text have been included in Section 4, Corrections and Additions.

3-2 The commenter suggests that potential environmental impacts could be further mitigated through implementation of the Redevelopment Plan. The comment is noted, but due to the dissolution of the Community Redevelopment Agency, the Proposed Alternative area will not be a redevelopment project area anytime in the foreseeable future. Therefore, the additional mitigations that are suggested would not be applicable.

3-3 The comment suggests that some clarifying language be included, but provides no additional analyses, facts, or findings that supplement and/or contradict the analyses and conclusions of the Original DEIR. The comment is noted.

3-4 See Response 3-3.

3-5 See Response 3-3.

3-6 See Response 3-3.

3-7 The comment notes that the Executive Summary references demographic data from two dates – 2000 and 2007 – and raises the issue of consistency and references for these data.

Data for 2000 and 2007 were drawn from two different surveys, both conducted by the U.S. Census Bureau: the U.S. Census and the American Community Survey (ACS), respectively. While the U.S. Census attempts to gather responses from every household in the nation, it is only conducted once every ten years. On the other hand, the ACS estimates figures based on a survey of 3 million households (roughly 2.5 percent of all households in 2000), and is conducted annually.

In the interest of providing the figures most recent to the Original DEIR's Notice of Preparation, 2007 ACS data is used where it is available, 2000 Census data where it is not. See Section 4, Corrections and Additions for added references.

- 3-8 See Response 3-3.
- 3-9 See Response 3-3.
- 3-10 See Response 3-3.
- 3-11 See Response 3-3.
- 3-12 See Response 3-3.
- 3-13 See Response 3-3.
- 3-14 See Response 3-3.
- 3-15 See Response 3-3.
- 3-16 See Response 3-3.
- 3-17 See Response 3-3.
- 3-18 See Response 3-3.
- 3-19 See Response 3-3.
- 3-20 See Response 3-3.
- 3-21 See Response 3-3.
- 3-22 See Response 3-3.
- 3-23 See Response 3-3.
- 3-24 Comment noted.
- 3-25 Comment noted.

3-26 The comment alleges that the Original DEIR neglects to explain how the Proposed Alternative will accommodate for growth induced by the Proposed Alternative, but provides no facts, reasonable assumptions based on facts, or expert opinions supported by facts in support of its position. The Original DEIR addresses anticipated growth in great detail in Section 13.3.2.2, including a discussion of regional greenhouse gas reduction, jobs-housing ratio, public works improvements, and new community facilities.

3-27 The comment references strategies that could be utilized should a redevelopment project area be established for the plan area, but with the dissolution of the CRA, this is not expected in the foreseeable future.

3-28. Comment noted.

4. Mountains Recreation & Conservation Authority, Paul Edelman, Chief of Natural Resources and Planning, October 26, 2011

4-1 The comment expresses general support for and requests changes to the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

4-2 The comment conveys a concern that the zoning for River Center specified in the Proposed Alternative will inappropriately constrain future development, and is noted. Staff is evaluating this area of change for revised recommendations. It is not anticipated that changes to the Proposed Alternative will result in any significant changes to the analyses or conclusions presented in this FEIR. In general, refinements to the Proposed Alternative are anticipated, if anything, to decrease impacts.

4-3 The comment requests a change to the zoning of Block 55 of the Proposed Alternative area, and is based on incorrect information. As Block 55 is already designated a Greenway in the Proposed Alternative, no change is needed.

5. Native American Heritage Commission, Dave Singleton, Program Analyst, September 30, 2011

5-1 The comment describes the legal status of Native American cultural resources, as well as the legal authority of Native American tribes and individuals as “consulting parties,” and is noted.

5-2 The comment describes the legal background of CEQA and project conditions necessitating the preparation of an Environmental Impact Report. In compliance with CEQA, the Original DEIR was prepared for the Proposed Alternative.

5-3 The comment confirms, according to the commenting agency’s Sacred Lands File, the absence of Native American cultural resources on record in the Proposed Alternative area. The commenter further indicates that unrecorded cultural resources may exist.

Please see Mitigation Measure 9.3 which requires that any ground disturbances 15' or more below the surface shall require the presence of a Native American of Gabrielino descent to observe and monitor sub-surface activities.

- 5-4 The comment describes legal protections for the confidentiality of Native American cultural resources, and is noted.
- 5-5 The comment identifies state and federal law mandating the consultation of Native American tribes and individuals with potential knowledge of cultural resources in the Proposed Alternative area. The consulting parties specified in the comment have been contacted, and no new cultural resources were identified. Please see Response to Comment 5-3 and Mitigation Measure 9.3
- 5-6 The comment identifies state law requiring that pertinent project information be provided to Native American consulting parties upon request. In compliance with California Public Resources Code §5097.95, relevant sections of the Original DEIR were transmitted to the tribes and individuals specified.
- 5-7 The comment identifies state and federal statutes outlining requirements for consultation with Native American consulting parties, and is noted. In compliance with California Public Resources Code §5097.95, relevant sections of the Original DEIR were transmitted to the tribes and individuals specified. In addition, pursuant to Mitigation Measure Cultural Resources 9-1a and b, if during the course of project development, any project encounters any paleontological or archaeological materials and/or human remains, the project shall halt until all the required steps (detailed in the Mitigation Monitoring Plan) have been successfully completed. Please also see Response to Comment 5-3 and Mitigation Measure 9.3
- 5-8 See response to Comment 5-4.
- 5-9 The comment identifies state law concerning the discovery of human remains during project construction, and is noted. See response to Comment 5-7.
- 5-10 The comment expresses an opinion concerning the relationship between Native American tribes, the Planning Department, and other stakeholders, and its impact on the quality of consultations with Native American parties. The comment is noted.

6. Los Angeles City Fire Department, Brian Cummings, Fire Chief, November 9, 2011

- 6-1 The comment restates the Project Description section of the Original DEIR. The language is quoted, and no additional statement or fact is provided. The comment is noted.
- 6-2 The comment describes the “fire-flow” (i.e. water supply) requirements of the Proposed Alternative area for adequate fire protection (2,000gpm for three fire hydrants flowing simultaneously). All projects shall be required to obtain a clearance from LAFD at which

time the department will determine whether additional off-site or on-site fire hydrants are required. See Mitigation Monitoring Plan Section 14.

- 6-3 The comment describes fire station distance requirements for the Proposed Alternative area for adequate fire protection (first-due Engine Company within 1 mile; first-due Truck Company within 1.5 miles), and states that the response distance is adequate. The comment is noted.
- 6-4 The comment describes building requirements for firefighting personnel access, and is noted. See Mitigation Monitoring Plan (Section 14).
- 6-5 The comment describes right-of-way requirements for firefighting apparatus access, and is noted. See Mitigation Monitoring Plan (Section 14).
- 6-6 The comment offers the conclusion that the Proposed Alternative will increase the need for fire protection and emergency medical services in the area, and restates that the Fire Department will need to review the need for off-site public and on-site private fire hydrants on a project by project basis. All projects requiring a Change of Use or Building Permit will be required to obtain clearance from LAFD. Original DEIR Proposed Alternative See Mitigation Monitoring Plan (Section 14)

7. California Department of Parks and Recreation, Jeff Brown, Senior Landscape Architect, November 18, 2011

- 7-1 The comment expresses an opinion about the significance of the potential impacts to Los Angeles State Historic Park (LASHP or the Park) on the Proposed Alternative, but provides no facts, reasonable assumptions based on facts, or expert opinions supported by facts in support of its position. The comment is noted.
- 7-2 The comment describes the history of the acquisition of the Park, and is noted.
- 7-3a The comment provides an overview of the LASHP General Plan, and encourages a partnership between the Planning Department and State Parks to promote its compatibility with the Proposed Alternative. The comment does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.
- 7-3b The commenter suggests aspects of the LASHP General Plan that could be affected by the Proposed Alternative. Staff is evaluating the addition of a maximum height limit and additional setback and stepback requirements for projects abutting the Park to address the commenter's concerns.
- 7-4 The comment expresses concern regarding the potential impact of new development near the Park on viewsheds from North Broadway and North Spring Street, both of the Park itself and of backdrops of the Repetto Hills and the San Gabriel Mountains. The comment is noted and will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative. Staff is evaluating the addition of a maximum height

limit and additional setback and stepback requirements for projects abutting the Park to address the commenter's concerns.

- 7-5 The commenter's concerns regarding the lack of maximum building heights or provision for the stepping back of buildings for the properties surrounding the Park are noted. In particular, the commenter expresses concern that the building heights have the potential to create a looming presence over the Park, block views of Elysian Park and the downtown skyline, and create a barrier from the communities of Solano Canyon and Chinatown to the Park. These concerns are also noted, and all of the comments will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative. Staff is evaluating the addition of a maximum height limit and additional setback and stepback requirements for projects abutting the Park to address concerns.
- 7-6 The commenter's concerns regarding the potential shade impacts of adjacent buildings on the Park are noted. A shade and shadow study has been completed that evaluated the impact of the proposed shade and shadow standard on the Park as well as the overall Plan area. The study concludes (see Corrections and Additions) that only very small portions of the Park will receive even one hour of shade on the Winter Solstice between the hours 10am and 2pm. To further evaluate the effect of future building heights on the Park, an additional study was conducted that illustrates that the solar irradiation for most of the park is quite high (Figure 1). The total possible amount of sun hours in a year is 4380 hours. Figure 2 illustrates that the majority of the park area will receive that full amount of hours, but areas surrounded by buildings will receive about 80% of the total sun hours. These areas will be shaded in the early morning and late afternoon. Throughout the majority of the day, there will be direct sunlight.
- 7-7 The commenter's suggestion that a development buffer be established for properties adjacent to the Park is noted. Staff is evaluating the development buffer standard in the Plan to address the concerns. The comments will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative.
- 7-8 The commenter's suggestion that a design overlay zone be established for the area bounded by North Broadway, the River, Main Street, and West College Streets is noted. The comments will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative.
- 7-9 The comment suggests that there are potential conflicts between the uses and activities proposed in the Park's General Plan and the FAR, uses, and Parks and Open Space sections, but is not specific as to the potential areas of conflict. Comment is noted.
- 7-10 The comment suggests that the Park's General Plan should be compatible with the uses proposed in the Project Alternative but provides no information that supplements and/or contradicts the analyses and conclusions of the Original DEIR.
- 7-11 The comment suggests that any traffic and parking impacts generated by special events at the Park should be evaluated in the Original DEIR. The Project Alternative establishes parking and noise standards for open space and park areas. Any project wishing to exceed

the standards identified in the Plan would need to seek an adjustment, exception or variance from the Plan.

- 7-12a The comment states that increased density for mixed-use, commercial and residential development within the immediate area of the Park has the potential to adversely impact the ability for the State to maintain and operate the Park. The City has agreed to permit a proscribed number of revenue generating events at the Park each year, which should assist the Park in meeting its budgetary obligations. In addition, the Plan establishes a Transfer of Floor Area (TFAR) Program, which will permit the State to sell the unused portion of its FAR.
- 7-12b. The comment suggests that, as the Park will account for at least one-third of the park and open space in the Plan area, the Plan evaluate alternatives for mitigating State Parks' increased costs of operating the Park. See the response above in Comment 7-12a.

8. City of Los Angeles Bureau of Sanitation, Wastewater Engineering Services Division, Ali Poosti, Acting Division Manager, November 22, 2011

- 8-1 The comment offers a cursory description of sewer infrastructure and service in Los Angeles, and is noted.
- 8-2 The comment explains that the commenting agency could not perform a thorough sewer capacity analysis with the level of detail provided in the project description, but does not state what information is needed to complete the analysis. See Response 8-4.
- 8-3 The comment provides basic information about the structure, condition, and capacity of sewer infrastructure in the Proposed Alternative area, and is noted.
- 8-4 The comment indicates that detailed project information, in the form of a Sewer Capacity Availability Request, must be submitted to the commenting agency for building permit approval. This procedure must be addressed on a project-by-project basis, and subsequent projects will be required to obtain clearance from the Bureau of Sanitation before obtaining a building permit (See Mitigation Plan- Section 15- Sewer).

9. Arroyo Seco Foundation, Tim Brick, Managing Director, November 22, 2011

- 9-1 The comment requests that the Original DEIR evaluate the possibility of river restoration and concrete removal from the Arroyo Seco. The Proposed Alternative is the adoption of the Cornfield Arroyo Seco Specific Plan, and as such pertains only to those parcels of land within the Plan area and does not include physical changes to the Arroyo Seco and Los Angeles River. The Original DEIR, in turn, analyzes the environmental impacts of the Proposed Alternative. The comment is noted.
- 9-2 The commenter requests that the 100-year floodplain plan delineate the 100-year floodplain for the Arroyo Seco as well. The 100-year floodplain for the Arroyo is contained within the channel itself.

9-3 The commenter requests that the project evaluate how it will impact current residents and the overall availability of affordable housing. The comment is noted.

9-4 The commenter requests that the USGS’s “Geological, Hydrological, and Biological Issues Related to the Proposed Development of a Park at the Confluence of the Los Angeles River and the Arroyo Seco, Los Angeles, California” be evaluated, and that any tasks that align with the Project Alternative be reported. The Project Alternative is the adoption of the Cornfield Arroyo Seco Specific Plan, and as such pertains only to those parcels of land within the Plan area and does not include physical changes to the Arroyo Seco and Los Angeles River. The Original DEIR, in turn, analyzes the environmental impacts of the Proposed Alternative.

10. California State Parks Foundation, Sara Feldman, Vice President of Programs, November 21, 2011

10-1 The commenter’s concerns regarding land use changes for the properties surrounding the Los Angeles State Historic Park are noted and will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative.

10-2 The commenter’s concerns regarding massing and street wall standards for the properties surrounding the Los Angeles State Historic Park are noted and will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative. Staff is evaluating the addition of a maximum height limit and additional setback and stepback requirements for projects abutting the Park to address the commenter’s concerns.

10-3 The commenter’s request that a special sub-category of the Urban Village zone be established for the properties surrounding the Los Angeles State Historic Park is noted and will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative. Staff is evaluating this recommendation. It is not anticipated that changes to the Proposed Alternative will result in any significant changes to the analyses or conclusions presented in this FEIR. In general, refinements to the Proposed Alternative are anticipated to if anything, decrease impacts.

10-4 The commenters requests that buildings, surrounding the Los Angeles State Historic Park, that would exceed forty feet in height and would shade the Park from between one hour after sunrise to one hour before sunrise not be permitted.

To understand the impact of the proposed building massing strategy on the Park as well as the Plan overall a shadow analysis was undertaken based on a computer based 3D model of the Project Alternative and the maximum allowable building heights and massing along both Spring Street and Broadway. The assessment found that on December 21 the majority of open spaces are subject to less than 1 hour of shadow during the daylight hours. A graphical illustration of this analysis is shown in Section 4, Corrections and Additions of this document. Also see response to Comment 7-6.

- 10-5 The commenter expresses concerns that the Plan may affect views from inside the Park. In particular, the commenter expresses concerns about the viewsheds of the downtown skyline, Broadway Bridge, Elysian Park and other structures with distinctive architectural styles. The comment is noted and will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative. Staff is evaluating the addition of a maximum height limit and additional setback and stepback requirements for projects abutting the Park to address concerns.
- 10-6 The commenter expresses concerns that the building massing along the edge of the park has the potential to create wind tunnels and, in turn, could negatively affect the enjoyment of the Park, as well as impact native habitats. In response to the concern raised by the State a wind analysis of the site has been subsequently completed and is included at the end of this Section. As can be seen on the Wind Analysis map the majority of the State Park will receive winds comfortable for light activities such as strolling. The southern or western most tip of the Park is more sheltered and will therefore be also comfortable to patrons who are sitting for short periods of time.
- 10-7 The comment conveys concerns that the impact of the Bonus and FAR Programs is not sufficiently addressed in the Original DEIR nor adequately described in the Plan. In light of this comment staff is evaluating revisions to the Plan text to clarify the Bonus and Transfer FAR Programs. A property cannot obtain an unlimited amount of “bonus or transferred FAR” but is limited by the maximum FAR of its specific site. While it’s not stated in the comment it’s assumed that the State’s concerns emanating from the future increased development are limited to the impact of shade/shadow and wind on the park, and the surrounding viewsheds. For a response on these topics please see the response to comments for 10-4, 105-, and 10-6 above.
- 11. Communities for a Better Environment, Bill Gallegos, Executive Director, November 23, 2011**
- 11-1 The comment conveys the concern that the Proposed Alternative may induce the displacement of existing residents, and does not address the analyses or findings of the Original DEIR. The commenter's support for the Southeast Asian Community Alliance's policy recommendations is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.
- 11-2 The comment proposes a number of social and economic equity goals for the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The commenter's suggestions are noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.
- 11-3 The air quality section has been revised to address comments related to health risks in proximity to TAC sources. See Response to Comment 2-6 for a discussion of recommendations outlined in CARB’s Air Quality and Land Use Handbook. Figure 11-1 has been revised to include existing residential uses identified as sensitive receptors.
- 11-4 See Response 11-2.

12. Craig Lawson & Co., LLC Land Use Consultants, Craig Lawson, President, November 23, 2011

12-1 The comment requests that the Plan and DEIR identify existing structures that would be brought into non-conformance as a result of altered zoning outlined the Proposed Alternative. Any such non-conforming use would automatically be grandfathered in, and would have the opportunity to pursue an entitlement action when pursuing future site modifications.

12-2 The comment suggests that the DEIR's estimate of 200,000 square feet of institutional development under the Proposed Alternative (Table 13-11, p.13-19) is insufficient and should be increased to accommodate the future expansion of Young Nak Church. The development projections do not reflect a maximum development threshold but are instead a projected estimate of the growth that may occur within the Proposed Alternative between 2007 and 2035. The estimates were used to inform the analysis to estimate the the impacts of growth on the environment and growth in excess of these projections is not prohibited.

12-3 The commenter asks that the Urban Innovation uses be revised to allow exceptions to the prohibitions of Religious and Social Service Organizations. As the potential impacts (e.g. traffic, water) of Religious and/or Conservation, Environmental, and Social Service Organizations would be less than those already contemplated by the uses permitted in the Urban Innovation District, the May 2012 Draft Plan has been revised to include these uses in the Urban Innovation District.

12-4 The comment suggests that the parking standards proposed by the Plan are in conflict with current parking requirements and are not sufficient to meet current demand. The comment is noted and will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative. Staff is reviewing the recommendation.

12-5 See response to Comment 12-3.

12-6 See response to Comment 12-3.

12-7 The comment suggests that the Plan recognize religious institutions as a sensitive land use as defined by L.A.M.C. 12.24 W. The comment is noted and will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative.

13. East Los Angeles Community Corporation, Mike Dennis, Director of Community Organizing, November 23, 2011

13-1 The comment conveys concerns and suggestions regarding the social and economic impacts of the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

- 13-2 The comment expresses an opinion about the adequacy of analysis of alternatives and mitigation in the Original DEIR, but provides no facts, reasonable assumptions based on facts, or expert opinions supported by facts in support of its position. The Original DEIR offers accurate demographic data in Section 13.1; addresses the impact of the Proposed Alternative on population, housing, and employment in Section 13.3; and concludes that the impacts are less than significant.
- 13-3 The comment expresses concern that the Plan undermines the City's Density Bonus Ordinances, and supports the Southeast Asian Community Alliance's policy recommendations regarding the Proposed Alternative. The comment further urges the City to adopt affordable housing polices and incentives in the Plan. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative. See Response to Comment 27-152 regarding the Community Oriented Design (COD) Alternative.
- 13-4 The comment expresses the opinion that the EIR must be recirculated, but provides no facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of its position.
- 13-5 The comment offers policy recommendations to be included as part of a project alternative that includes requirements and incentives for affordable housing, and does not address the analyses or findings of the Original DEIR. CEQA Guidelines Section 15126.6 requires that a DEIR describe a range of reasonable alternatives to the project that would avoid, or substantially lessen, significant impacts of the project. However, the comment fails to indicate significant impacts that were not already addressed in the Original DEIR that would be lessened by this alternative. See Response to Comment 27-152 regarding the Community Oriented Design (COD) Alternative.

14. Esperanza Community Housing Corporation, Nancy Halpern Ibrahim, Executive Director, November 23, 2011

- 14-1 See response to Comment 13-1.
- 14-2 The comment expresses an opinion about the adequacy of analysis of alternatives and mitigation in the Original DEIR, but provides no facts, reasonable assumptions based on facts, or expert opinions supported by facts in support of its position.
- 14-3 See response to Comment 13-3.
- 14-4 See response to Comment 13-4.
- 14-5 See Response 13-5.

15. Friends of the Los Angeles River, Lewis MacAdams, President, November 23, 2011

- 15-1 The comment makes a number of statements about the future vision for the Los Angeles River, but provides no additional analyses, facts or findings that supplement and/or

contradict the analyses and conclusions of the Original DEIR. The Proposed Alternative Plan is the adoption of the Cornfield Arroyo Seco Specific Plan, and as such pertains only to those parcels of land within the Plan area and does not include physical changes to the River channel itself. The Original DEIR, in turn, analyzes the environmental impacts of the Proposed Alternative. Staff is evaluating revisions to policy text to clarify the importance of the Plan area as one of the Los Angeles River Revitalization Master Plan's five opportunity sites.

- 15-2 The commenter's recommendations regarding land use changes for the Lincoln Heights Jail are noted and will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative.
- 15-3 The commenter's recommendations regarding land use changes for Metro's Midway Yard are noted and will be forwarded to the decision makers for their consideration in taking action on the Proposed Alternative.
- 15-4 The comment expresses concerns about the displacement of low-income peoples and supports the recommendations submitted by SEACA and Public Counsel. Comment noted.
- 15-5 The comment expresses the opinion that the EIR must be recirculated, but provides no facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of its position.
- 16. Green LA Coalition, Stephanie Taylor, Interim Executive Director, November 17, 2011**
- 16-1 See Response 11-1.
- 16-2 See Response 11-2.
- 16-3 See Response 11-3.
- 16-4 See Response 11-2.
- 17. Green LA Coalition, Stephanie Taylor, Interim Executive Director, November 23, 2011**
- 17-1 See Response 13-1.
- 17-2 See Response 13-2.
- 17-3 See Response 13-3.
- 17-4 See Response 13-4.
- 17-5 See Response 13-5.

18. Little Tokyo Service Center, Bill Watanabe, Executive Director, November 14, 2011

18-1 The comment offers a number of suggestions regarding the social equity, public health, and civic participation aspects of the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The commenter's suggestions are noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

19. Los Angeles Alliance for a New Economy, Aiha Nguyen, Senior Policy Analyst, November 10, 2011

19-1 The comment recommends a number of policy changes to the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The commenter's suggestions are noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

19-2 The comment is addressed to other organizations seeking their support for the ideas outlined in the comment and does not address the analyses or findings of the Original DEIR. The comment is noted.

20. Los Angeles Conservancy, Adrian Scott Fine, Director of Advocacy, November 21, 2011

20-1 The comment describes the legislative intent and legal background of CEQA, and is noted.

20-2 The comment states an opinion about the adequacy of analysis of impacts, and suggests that the Proposed Alternative will affect "development pressures" and "revitalization options." However, the commenter does not provide evidence as to how the potential economic or social changes mentioned in the comment would cause a physical change per CEQA Section 15064(e). Also, CEQA section 15064(f)(6) states, "Evidence of economic and social impacts that do not contribute to or are not caused by physical changes in the environment is not substantial evidence that the project may have a significant effect on the environment." The comment does not provide any data or analysis to support the assertion and demonstrate a causal link that the proposed land use changes will result in a significant effect on the environment. In addition, should redevelopment of either William Mead Homes or the Lincoln Heights Jail be contemplated, they would be required, as per the standards described in the Plan, to demonstrate how the project has met the Secretary of the Interior's Standards as determined by the Office of Historic Resources.

20-3 The comment summarizes the historic background of William Mead Homes, and is noted.

20-4 The comment states an opinion concerning the compatibility of the proposed zoning change with the historic use of William Mead Homes, but provides no facts, reasonable

assumptions based on facts, or expert opinions supported by facts in support of its position.

- 20-5 The comment conveys a concern that the rezoning of William Mead Homes will enable and encourage the redevelopment of the property, compromising its status as an historic resource. At this time, any potential impacts to the William Mead Homes are remote and speculative, as no project has yet been proposed. However, should a project be proposed in the future, any proposed changes would be required, as per the standards described in the Plan, to demonstrate how the project has met the Secretary of the Interior’s Standards as determined by the Office of Historic Resources.

The comment further suggests that the FEIR should evaluate the potential direct and indirect impacts of the Plan’s zone changes on William Mead Homes and its surroundings. The comment provides loose and general statements about potential impacts without identifying specific impacts that could result due to implementation of the Plan. In addition, the Plan’s proposed urban design standards are designed specifically to improve the human scale of the Plan area and therefore will greatly increase the compatibility of future projects with the William Mead Homes. The existing zoning, which permits large industrial floor plates, has certainly not produced an urban environment that is sensitive in mass, scale, and design to this historic resource.

- 20-6 The comment summarizes the historic background of Lincoln Heights Jail, and is noted.
- 20-7 The comment expresses support for the Modified Project Alternative described in Section S.6.4.3 because of concerns regarding the “threat of demolition” of Lincoln Heights Jail, but suggests that a greater range of uses be permitted in order to serve the existing community and retain public accessibility while also stimulating viable rehabilitation of the Jail. Staff concurs, and the definition of permitted uses in the Urban Innovation District has been expanded in the May 2012 Draft Plan to permit ancillary entertainment and cultural uses on the Jail site. The impacts of this change are less than significant as the impacts of this additional use (e.g. traffic, water) are less than other uses already permitted for this district.
- 20-8 The comment requests that the Proposed Alternative include a statement acknowledging that inventories of designated resources are continually updated by the inclusion of new resources, and that no one list should be considered definitive. Staff is currently evaluating revisions to the Proposed Alternative policy text to add such a statement, including contact information within the Department for the most up-to-date survey information. In addition, the effective date will be added to the designated historic resources list and map.
- 20-9 The comment offers recommendations on the implementation of Mitigation Measure Cultural Resources 2, described in Section 9.3.2 – specifically, 1) the inclusion of a fully detailed review process and standards for projects affecting historic resources, and 2) incentives for owners of historic properties in the Proposed Alternative area. Staff is currently evaluating revisions to the Proposed Alternative based on these recommendations.

Furthermore, staff will correct (See Section 4. Corrections and Additions) the Proposed Alternative's reference to the Department of Cultural Affairs to reflect that permit review is conducted by the Cultural Heritage Commission and its staff at the Office of Historic Resources.

21. Los Angeles County Bicycle Coalition, Alexis Lantz, Planning and Policy Director, November 17, 2011

21-1 The comment expresses support for access to affordable housing, transit improvements, and road safety in the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The comment is noted.

22. Los Angeles County Bicycle Coalition, Alexis Lantz, Planning and Policy Director, November 23, 2011

22-1 The comment expresses support for the stated goals and, with reservation, certain elements of the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

22-2a The comment expresses opinion concern about the adequacy of analysis of traffic safety impacts in the Original DEIR. The Original DEIR addresses the environmental impact of transportation in Section 4.3. Furthermore, as detailed on page 2-14 of the Original DEIR, one of the identified objectives of the Specific Plan is to "facilitate pedestrian mobility [and] encourage bicycle use..." Another of the identified objectives is to "lessen dependence on automobiles, and thereby reduce vehicle emissions, while enhancing the personal health of residents, employees, and visitors." As described on page 2-15 and illustrated in Figure 2-1 on p. 2-16, the Urban Village, Urban Innovation, and Urban Center zoning districts, which will make up the bulk of the zoning types in the Project Area (aside from existing residential areas and a Greenway zoning category), all emphasize a dense network of streets with bicycle lanes, with block length maximums to encourage smaller block sizes for improved pedestrian mobility, ample sidewalks, and street trees to encourage pedestrian and bicycle mobility. In the areas designated with these zoning categories, the number and quality of pedestrian and bicycle facilities will be substantially enhanced over existing conditions, thereby improving pedestrian and bicycle mobility as a result of the Specific Plan. New pedestrian and bicycle facilities would be designed in accordance with safety and access requirements in effect at the time of their design, such as Americans with Disabilities Act (ADA), and pedestrian and bicycle design best practices.

The specific design details of pedestrian and bicycle facilities would be developed through the implementation process of the Specific Plan, and as specific development projects are proposed. The precise design of all new pedestrian and bicycle facilities cannot be determined at this time. However, to provide further guidance on the design of pedestrian and bicycle safety measures, the following additional measures will be incorporated into the FEIR and May 2012 Draft Plan:

- Develop a toolbox of pedestrian and bicycle safety best practices to be implemented as feasible over the continued redevelopment of the Specific Plan area. The toolbox would include measures such as curb extensions, high visibility differentiated pedestrian crossings, colored bikeways at conflict areas and buffered or separated bikeways.

The increase in density and traffic volumes associated with the Plan does not necessarily correspond to an increase in safety hazards for pedestrians and bicyclists, because pedestrian and bicycle facilities will be significantly improved as a result of the Specific Plan. Roadway narrowings associated with the Specific Plan will slow traffic. Generally, traffic speeds and design issues such as sight distance play a bigger role in the proclivity for collisions than general traffic volumes.

22-2b The comment also expresses concern that the Original DEIR fails to identify significant impacts on bicyclists/pedestrians due to increased vehicle traffic, especially near schools and other facilities frequented by children on foot or bicycle. As described above, in response to Comment 22-2a, the Proposed Alternative would include substantial enhancements to existing pedestrian and bicycle facilities, as well as a large increase in new facilities, which would benefit pedestrian and bicycle safety around schools in the Specific Plan area. The precise location and design of all new pedestrian and bicycle facilities cannot be determined at this time. However, to address pedestrian and bicycle safety in school zones, the following additional measure will be incorporated in the FEIR:

- The City of Los Angeles will support the Los Angeles Unified School District in preparing Safe Routes to School (SRTS) plans for the schools located within the Project Area in the form of data analysis, logistics, and grant writing associated with the preparation of the SRTS plans.

22-2c The comment suggests that the DEIR failed to recognize the safety hazard as a result of the lack of continuity between Class II bike lanes, specifically W. Broadway to San Fernando Road, San Fernando Road/S. Ave. 20 to N. Main Street, and W. Ave. 26 to Figueroa Street;

The Original DEIR illustrates the bicycle network for the Proposed Alternative (DEIR Figure 4-7, p. 4-30). Continuity is provided between the Class II bike lanes proposed for West Broadway and San Fernando Road via Class II bike lanes proposed for Avenue 18 and Pasadena Avenue, enabling a cyclist to travel from North Broadway to North San Fernando Road on a continuous Class II bike lane; therefore, there is no safety hazard to address.

To assist the continuation of bicycle facilities from Broadway to Main along Avenue 20, the road is being re-designated from a Secondary to a Local Modified. This designation protects the street from further widening and maintains the roadway as a 40' roadbed

with one lane of travel each direction and parking on each side of the street. With this configuration, sharrows can be added. Section 4, Corrections and Additions and the August 2012 Draft Plan will reflect this addition.

In order to facilitate bicycle movements from the Gold Line Station to Figueroa, Class II Bike Route markings and sharrows will added on Avenue 26 in Section 4, Corrections and Additions and the August 2012 Draft of the Plan.

22-2d The comments suggests that the DEIR fails to consider Class III bike lanes (sharrows and/or signage) as a mitigation tool to maintain bikeway connectivity where Class II bike lanes are not feasible due to high traffic volumes that require maximum peak hour lanes. Section 4, Corrections and Additions and the August 2012 Draft Plan will designate Broadway from the Los Angeles River east to the Plan's eastern boundary at the 5 Freeway as a temporary Class III bicycle facility with signage and roadway markings as permitted for a Major Class Roadway with peak hour lanes until which time a Bicycle Lane can be accommodated in this section as envisioned by the 2010 Bicycle Plan.

22-2e The comment suggests that the Original DEIR fails to address the traffic and safety impacts of one-way bike lanes along S. Ave. 18 and S. Ave. 19 between W. Broadway and Barranca Street. Avenue 18 and Avenue 19 are low-volume, low-speed roadways. Because there is insufficient room in the roadway cross section to accommodate two way bike lanes, and on-street parking needs to be retained to meet demand, it is not feasible to implement bike lanes in both directions on both Avenues. Because they are located one block away, the two roadways serve the same travel market, and essentially function as two one-way couplets for bike lanes. Therefore, it is concluded that there is no traffic and safety impact that needs to be addressed associated with one-way bike lanes on Avenue 18 and Avenue 19.

22-3 The comment expresses the opinion that the EIR must be recirculated, but provides no facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of its position.

23. The Metabolic Studio, Meredith Hackleman, November 23, 2011

23-1 See Response 13-1.

23-2 See Response 13-2.

23-3 See Response 13-3.

23-4 See Response 13-4.

23-5 See Response 19-2.

24. Pacoima Beautiful, Lauren Ahkiam, November 23, 2011

24-1 See Response 13-1.

- 24-2 See Response 13-2.
- 24-3 See Response 13-3.
- 24-4 The comment suggests that the Plan has the opportunity to create a more livable community that provides jobs, a clean environment, and affordable housing, but if only if concerns are sufficiently addressed before the Plan is finalized. The comment does not address the analyses or findings of the Original DEIR, and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

25. Physicians for Social Responsibility, Los Angeles, Patricia Ochoa, Environment and Health Coordinator, November 23, 2011

- 25-1 The comment asserts that the Original DEIR fails to meet adequate mitigation for Impact Air Quality 1 and 2, but offers no facts or evidence based on facts to support this conclusion. The Air Quality discussion on potential health risk impacts from poor air quality due to proximity to freeway, industrial and rail yard sources has been revised and recirculated in the RP-DEIR on May 31st, 2012 to address this impact. See Response to Comment 2-5 and 2-6 and Section 2.A-I of the RP-DEIR for the revised analysis of potential health risk impacts. In addition, the I-10 freeway is approximately 3,500 feet from the Project Area boundary, and as such, would not contribute to substantial TAC sources.
- 25-2 The comment asserts that the NAAQS monitoring network does not capture PM 2.5 near heavily trafficked highways, and notes the elevated PM 2.5 concentrations compared to background concentrations as established by the EPA. The commenter further suggests that by not monitoring PM 2.5 near major roadways, the direct health impact of traffic-related air pollution to sensitive receptors will not be known, and the Specific Plan fails to develop mitigation standards for local air impacts associated with high levels of air pollutants from freeways.

The Air Quality discussion on potential health risk impacts from poor air quality due to proximity to freeway sources has been revised and recirculated in the RP-DEIR on May 31st, 2012 to address this impact. The revised analysis included a research and guidance from the CARB in their *Air Quality and Land Use Handbook: A Community Health Perspective*, which characterizes the freeways as contributing to a substantial source of diesel particulate matter (DPM) emissions, of which PM 2.5 is a main component. Mitigation Measure Air Quality 2 has been revised in the RP-DEIR to include the 500-foot siting distance from freeway sources recommended by CARB unless an HRA is conducted to determine that the buffer is not necessary to reduce cancer and non-cancer risks from freeway TAC sources.

As the comment suggests the Original DEIR did not properly disclose existing PM 2.5 emissions within and affecting the Project Area, that courts have determined that CEQA must address the impacts of a project on the environment (for example, changes to transportation infrastructure that might be in proximity to sensitive receptors), but not the

impacts of the environment on a project. See *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473 (“[T]he purpose of an EIR is to identify the significant effects of a project on the environment, not the significant effects of the environment on the project.”). Thus, impacts analysis of the air environment on new sensitive receptors in proximity to transportation facilities is not required by CEQA, but in the interest of providing information to the public, this impact is analyzed.

See Response to Comment 2-5 and 2-6 and Section 2.A-I of the RP-DEIR for the revised analysis of potential health risk impacts.

- 25-3 The comment notes several national studies that demonstrate the negative health effects of living in proximity to freeways that include decreased life expectancy, lung cancer, respiratory disease and decreased lung function, reproductive health problems, heart and lung disease, and increased asthma symptoms. The comment regarding the research findings and health effects of living in proximity to freeway emission sources is noted and will be forwarded to the decision maker.
- 25-4 The Air Quality discussion on health risk impacts from poor air quality has been revised and recirculated in the RP-DEIR on May 31st, 2012 to address health risk impacts from freeway TAC emission sources. See Response to Comment 2-5 and 2-6 for discussion of CARB’s recommendations in siting sensitive land uses in proximity to freeways and site-specific design improvements in reducing exposure to TAC emissions. Mitigation Measure Air Quality 2 has been revised to include the 500-foot siting distance from freeway sources recommended by CARB unless an HRA is conducted to determine that the buffer is not necessary to reduce cancer and non-cancer risks from freeway TAC sources. Mitigation measures Air Quality 2 through 10 have been added to incorporate measures designed to reduce TAC exposure to sensitive land uses, such as installation of air filtration systems and planting a vegetated screen for new sensitive land uses within recommended buffer distances to TAC sources. See Section 2.A-I of the RP-DEIR for the revised analysis of potential health risk impacts.
- 25-5 The comment states that Mitigation Measure Air Quality 1 does not set in place specific measures to reduce vehicular emissions that would result from the Proposed Alternative and the increases in traffic will result in increase in health impacts associated with ozone, PM10, PM2.5 and other criteria pollutants. Most of the measures described in Mitigation Measure Air Quality 1 describe project design features of the Proposed Alternative that will be implemented through land use regulatory changes, design guidelines and modification to streets standards. The new land use designations are intended to encourage greater mixture of uses and balance between the employment generating industrial and office uses with residential and commercial retail uses. Research has demonstrated that locating residential in near proximity to retail can reduce the vehicle travel demand of retail by as much as 25 percent⁶, and locating housing in close proximity to employment can lead to a reduction of 15 percent.⁷ Applying the assumptions of the land use scenarios of the Proposed Alternative, page 26 of the June 2011 Transportation Analysis prepared

⁶ Cervero, R. (1996b). Mixed land uses and commuting: Evidence from the American housing survey. *Transportation Research A*, 30(5), 361-377.

⁷ Ewing, R. (1996). *Best development practices*. Chicago: APA Press.

by Fehr and Peers predicts that 14 percent of all trips would be non-auto based in the Proposed Alternative in 2035 compared to 8 percent predicted for the No Project alternative in 2035. In addition, the traffic model also estimated that the average auto trip length and time for project-related trips would decrease by 13% and 12%, respectively.

- 25-6 The comment states that Transportation Demand Management (TDM) strategies must be included in the Specific Plan but does not specify the TDM measures nor does the comment provide supporting data and/or facts to demonstrate any measures would reduce potential impacts. However, the Mitigation Measure Transportation 1 was incorporated into the Original DEIR that included TDM measures such as unbundled parking program, increased bicycle facilities, transportation information center, car sharing, transit pass subsidies and employee sponsored parking cash out. These TDM measures shall be incorporated in to conditions of approval for applications pursuant to the Specific Plan regulations. In addition Mitigation Measure Transportation 1 has been revised to expand the transit pass purchase program to include residential uses. See Section 4.0 Corrections and Additions.
- 25-7 The comment stats that the Original DEIR should analyze mitigation measures for automobile and diesel truck emissions at 11 “hot spot” intersections. However, the comment does not provide facts or evidence based on facts that mitigation is required to reduce a significant impact. Table 11-9 in the Original DEIR demonstrates that the 8-hr carbon monoxide (CO) emissions will be well below the 9 parts per million (ppm) standard under the build-out of the Proposed Alternative and impacts will be less than significant.
- 25-8 The comment states that the Proposed Alternative include localized monitoring stations for the hot spots to check for PM2.5 and PM10 emissions. See Response to Comment 25-7.
- 25-9 The comment that CARB recommends a 500 feet siting distance of sensitive receptors from freeways is noted. The Air Quality discussion on health risk impacts from poor air quality has been revised and recirculated in the RP-DEIR on May 31st, 2012. As part of the revised analysis, Mitigation Measure Air Quality 2 was revised to include the 500-foot siting distance from freeway sources recommended by CARB in their Land Use and Air Quality Handbook, unless an HRA is conducted to determine that the buffer is not necessary to reduce cancer and non-cancer risks from freeway TAC sources. See section 2.A-I of the RP-DEIR for the revised analysis of potential health risk impacts.
- 25-10 Recommendation to require a siting distance of 500 feet for sensitive land uses from freeways is noted. Mitigation Measure Air Quality 2 has been revised in the RP-DEIR to include the 500-foot siting distance from freeway sources recommended by CARB unless an HRA is conducted to determine that the buffer is not necessary to reduce cancer and non-cancer risks from freeway TAC sources. See Section 2.A-I of the RP-DEIR for the revised analysis of potential health risk impacts.
- 25-11 The comment suggests that air monitoring for current sensitive receptors be included in the Proposed Alternative located within 500 feet of the freeway. The comment does not

present facts of how the existing sensitive receptors would be impacted as the result of the Proposed Alternative. Such monitoring conditions for existing uses would be beyond the scope of CEQA since they are already part of the existing conditions and that there is no rational nexus based on the actions of the Proposed Alternative.

- 25-12 Recommendation to integrate a “buffer” or mitigation strategies for sensitive land uses along the freeways is noted. For discussion on buffer see Response to Comments 2-5, 2-6 and 25-10 above. Mitigation measures Air Quality 2 through 10 are incorporated to reduce health risks to future sensitive receptors to the maximum extent feasible, such as instillation of air filtration systems and planting a vegetated screen for new sensitive land uses within recommended buffer distances to TAC sources. See section 2.A-I of the RP-DEIR for the revised analysis of potential health risk impacts. The I-10 freeway is approximately over 3,500 feet from the Project Area boundary, and as such would not contribute to substantial TAC sources to sensitive receptors within the Project Area.
- 25-13 The comment suggestion to analyze mitigation strategies for air pollutants, noise and vibrations is unclear. Portions of the air quality and noise analysis were revised and recirculated in the RP-DEIR on May 31st, 2012. As the EIR is a programmatic document, project level emissions and effectiveness of mitigation cannot be quantified for individual development projects. Regional construction air quality emissions were modeled and mitigation measures were quantified in Table 2.A-1 of the RP-DEIR. The impacts pertaining to TAC emissions, localized construction emissions and construction noise and vibration are considered significant and unavoidable and mitigation measures were included to the maximum extent feasible as permitted by 15041 and 15126.4 of the CEQA Guidelines. See Sections 2.A-I, A-II, A-III, and 2.C-1 of the RP-DEIR.
- 25-14 The comment suggests that a Health Impact Assessment be conducted to measure air quality impacts and mitigation strategies for the Proposed Alternative. This EIR is a programmatic document and there are no specific proposed development projects at this time. Methodological inputs about specific site location and orientation of TAC sources, and sensitive receptor locations, emission profiles and local meteorology are a few of the factors required for an HRA to produce a quantitative health risk impact conclusion.⁸ Performing a quantitative analysis to determine the significant health risk impact to future residents could only be conducted at the time of the development of a specific project. However, because sensitive receptors would potentially be permitted in proximity to TAC sources under the siting distances to industrial uses prescribed in the CARB Air Quality and Land Use Handbook, and within an area that currently exceeds threshold values for TAC related health risks, the health risk impacts related to siting sensitive land uses in proximity to TAC sources is revised in the RP-DEIR to be considered a potentially significant impact. See Sections 2.A-I of the RP-DEIR.
- 25-15 The comment supports the Community Oriented Development Overlay Zone (COD) proposed by the Southeast Asian Community Alliance (SEACA) and Public Counsel and

⁸ CAPCOA. 2009. Health Risk Assessment for Land Use Projects.

expresses interest in making sure that the Plan avoids displacement of local residents. Please see Master Response 1 on Housing Displacement and Response to Comment 27-152 regarding the Community Oriented Design (COD) Alternative.

25-16 The comment expresses optimism that the Plan will provide a healthy environment and will not displace residents. The comment is noted.

26. Public Counsel Law Center, Serena Lin, Staff Attorney, November 17, 2011

26-1 The comment conveys a concern regarding incentives for affordable housing developers, and presents policy recommendations for the Proposed Alternative. The comment does not address the analyses or findings of the Original DEIR, and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

26-2 The comment offers policy recommendations concerning requirements and incentives for affordable housing, and does not address the analyses or findings of the Original DEIR. The commenter's recommendations are noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

27. Southeast Asian Community Alliance, Public Counsel Law Center, Chatten-Brown & Carstens, and Natural Resources Defense Council, Sissy Trinh, et al., November 23, 2011

27-1 The comment describes the intended outcomes of the Plan. The comment is noted.

27-2 The comment claims that the Original DEIR fails to disclose, analyze, and/or mitigate significant adverse impacts but does not provide any information about the impacts. The comment further suggests that the COD alternative could alleviate environmental concerns and that the Plan should be amended to include the COD alternative. Any changes to the Plan will be forwarded to the decision makers. See Response to Comment 27-152 regarding the Community Oriented Design (COD) Alternative.

27-3 The comment describes the intention, and some of the requirements, of CEQA legislation. The comment is noted.

27-4 The comment states that many of the Original DEIR's conclusions and analysis are faulty and that many of the mitigation measures are insufficient. The comment doesn't provide sufficient detail or provide additional analysis to substantiate its claim. The comment is noted.

27-5 The comment urges the City to adopt the COD. The comment is noted. See Response to Comment 27-152 regarding the Community Oriented Design (COD) Alternative.

27-6 The comment requests the City to re-circulate the Original DEIR. Due to some technical deficiencies in the Original DEIR some sections of the Original DEIR were recirculated for a 45 day comment period that extended from May 31 to July 16, 2012.

- 27-7 The comment states that the Original DEIR misuses the application of tiering under CEQA to avoid reaching significance conclusions. Subsequent to further review of the Original DEIR several sections of the Original DEIR were re-circulated to describe the cumulative benefits of multiple projects being constructed simultaneously.
- 27-8 The comment reiterates concerns that the Original DIER has specific deficiencies and legal shortcomings and should be revised and recirculated. The Original DEIR has been revised and recirculated in the RP-DEIR on May 31st, 2012..
- 27-9 The comment alleges that the Proposed Alternative conflicts with the City’s General Plan, citing land use policies and objectives related to resident displacement, park space, and business placement. The comment further claims that the Original does not provide sufficient analysis or mitigation for these inconsistencies. However, the commenters provide no examples of specific policies within the Proposed Alternative that conflict with the General Plan, or of impacts that would arise from such inconsistencies and require subsequent mitigation. Therefore, no further response can be provided.
- 27-10 The comment claims that the Original DEIR offers no analysis of resident displacement, and thus fails to address an inconsistency between the Proposed Alternative and relevant Community Plans. In particular, the comment references Comment 27-20, which argues that the Proposed Alternative area’s proximity to newly planned transit stations may increase residential property values, thus exposing existing renters to the risk of displacement. See Response MR1 on Displacement for a discussion of issues concerning displacement of residents.
- 27-11 The comment claims that the Original DEIR does not analyze consistency with the Central City North Community Plan (CCNCP) – particularly in relation to policies concerning community needs and park access – but fails to identify any specific policies within CCNCP at odds with the Proposed Alternative. CCNCP features only one policy related to recreation and park facilities, which reads: “Preserve the existing recreational facilities and park space” (Policy 4-1.1). In addition, the only policy concerning community needs relates to “the viability of existing neighborhood stores and businesses” (Policy 2-1.3). Since the commenters do not articulate specific conflicts between these policies and the Proposed Alternative, no further response can be provided.
- 27-12 The comment expresses concern that the new zoning districts outlined in the Proposed Alternative will create potential for conflicting adjacent land uses and as such would result in negative impacts for new residents by allowing a mix of land uses in each district, including light-industrial. The Original DEIR finds this potential land use impact to be less than significant, on the basis of performance standards part of the Proposed Alternative (see Section 2.7 of the Draft CASP in Appendix A5 of the FEIR), which developers must agree to adhere to in order to obtain a building permit.

The comment goes on to allege that the Original DEIR’s finding is “entirely without foundation” and “conclusory”. On the contrary, to anticipate or presuppose a developer’s future deviation from legally binding performance standards are too speculative to

warrant evaluation. CEQA Guidelines Section 15145 notes that, for such speculative impacts, “the agency should note its conclusion and terminate discussion of the impact.”

In addition, the portion of the Original DEIR that addressed health impacts to sensitive receptors due to proximity to TAC emitting sources has been revised and recirculated in the RP-DEIR on May 31st, 2012. Because sensitive receptors would potentially be permitted in proximity to TAC sources under the siting distances to industrial uses prescribed in the CARB Air Quality and Land Use Handbook, the discussion of health risk impacts related to TAC sources was revised to be considered significant and unavoidable. Mitigation measures Air Quality 3 through 10 have been added to reduce impacts from both freeway and industrial TAC sources such as the existing industrial facilities in the Project Area and the LATC railyard. Such measures include installation of air filtration systems and the planting of vegetated screens for new sensitive land uses within recommended buffer distances to TAC sources.

In conclusion, the comment does not provide facts or evidence based on facts of the nature and extent of an impact that would occur as a result of the land use designation. For land use, visual, air quality and noise impacts of the Proposed Alternative see Chapters 3, 5, 11 and 12 of the Original DEIR. For the revised discussion on health impacts due to proximity to TAC emitting sources see Section 2.A-1 of the RP-DEIR. For description of performance standards see Section 2.7 of the Draft CASP in Appendix A5 of the FEIR.

- 27-13 The comment suggests that the Proposed Alternative improperly applies tiering of environmental review, and claims that this misapplication may lead to cumulative impacts not discussed in the Original DEIR. See Response 27-7 for a discussion of tiering and its use in the Proposed Alternative.

However, the Original DEIR indicates that in order to qualify for the administrative clearance needed to bypass further environmental review, projects must be “consistent with all requirements of the Specific Plan” (p. S-1). Furthermore, exemption from environmental review does not except a project from having to obtain a building permit, which legally obligates adherence to performance standards outlined in Section 8 of the Proposed Alternative. These performance standards form the basis for the Original DEIR’s analysis of cumulative impacts in Section 17.2.

- 27-14 The comment claims that the Original DEIR fails to discuss “how the CASP responds to specific objectives and policies in the Housing Element” of the City’s General Plan. However, CEQA Guidelines Section 15125(d) requires only that an EIR “discuss any *inconsistencies* between a proposed project and applicable general plans” (emphasis added), rather than mandating a general discussion of the relation between the two. See Response 27-15 for a detailed discussion of consistency between the Proposed Alternative and the General Plan Housing Element.

- 27-15 The comment states that the Original DEIR fails to analyze the Plan’s consistency with the Housing Element and provides no discussion as to how the Plan will meet specific objectives and policies of the Housing Element. The Plan area today, which is largely

zoned industrial restricts the development of housing. The Plan, by introducing several new zoning districts, particularly the Urban Village district, will facilitate a greater concentration of housing than is permitted today.

- 27-16 The comment suggests that the Plan's proposal to change the general land use designation for many of the parcels to a Hybrid Industrial Land Use could eliminate the viability of sites that were accounted for in the Housing Element's Regional Housing Needs Assessment (RHNA). The comment further suggests that there are 13 RHNA sites identified in the Central City North Community Plan that are within the Plan area. In fact though there is only one site in the Plan area that is noted in the Central City North Map in Appendix H of the Housing Element and this site is proposed to be zoned as Urban Village which will accommodate housing.
- 27-17 The commenter's concern that the Plan's proposed mixed-use zoning is incompatible with the William Mead Homes and isolates current residents is noted. By virtue of its status as a community cultural resource and eligibility for the National Register of Historic Places William Mead Homes is afforded protections under the Secretary of the Interior's Standards and would be subject to approval by the Office of Historic Resources. At this time, no changes to the William Mead Homes are proposed and therefore any future impacts are remote and speculative.
- 27-18 The comment cites past legal precedent that the Original DEIR needs to analyze the impact of the Plan on displacing existing businesses and residents without providing any additional rational or analysis that provides evidence that the Plan would in fact, displace businesses and/or residents.
- 27-19 The comment expresses concern that the Original DEIR gives no consideration to the impacts of businesses being displaced from the Plan area. If a business elects to relocate it may be the result of redevelopment activity taking place within the Plan area and any resulting businesses or project that occurs in its place has been studied, as a part of this DEIR, and will have to conform to the new standards set forth in the FEIR as well as the Plan. It is further speculation as to where any displaced business would relocate and it would also be bound by any rules and regulations in place at the new business location.
- 27-20 The comment suggests that the Original DEIR has failed to analyze the potential that Project residents could be displaced as a result of rising housing costs attributed to the proximity of transit which could lead to indirect environmental impacts such as increased Vehicle Miles Traveled (VMT) and traffic congestion. (See Response to Comment 27-75 on existing and projected VMT and transit participation rates in the Project Area and MR1 on Housing Displacement) The Plan proposes to maintain the current zoning designations in the existing low-density residential areas within the Plan area to protect existing residential neighborhoods from encroachment by new development, as noted on page 2-15 of the Original DEIR. On page 13-17, the Original DEIR states "Implementation of the Proposed Alternative would not result in a net loss or displacement of existing housing units, which includes no net loss or displacement of existing affordable housing units."

Because implementation of the Proposed Alternative will result in new housing in the Project Area it would not displace residents necessitating the construction of replacement housing elsewhere. The new zoning designations, and the anticipated redevelopment, would be directed to the areas in the Project Area that are currently primarily industrial in use, so redevelopment activities would not displace any existing residents. Therefore, the bulk of the redevelopment activity that would occur within the Project Area would not affect development within existing residential areas. Increasing the number of available housing units within the Project Area to meet anticipated demand for housing in the City of Los Angeles, would not be expected to increase housing costs for existing Project Area residents. Rather, the increase in available units would provide opportunities for additional residents to live in the Plan area. Also see MR-1 Housing Displacement.

On pages 13-16 to 13-17, the Original DEIR references a series of objectives from the City of Los Angeles General Plan related to housing, and it states that the “Proposed Alternative would respond” to the designated objectives and policies from the General Plan. Specifically, the Original DEIR lists the following two objectives related to incentivizing affordable housing within the Specific Plan area:

- Policy 4.1.6 Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City. (P2, P23)
- Policy 4.2.1 Offer incentives to include housing for very low- and low-income households in mixed-use developments. (P2, P23)

To further encourage residential projects to include units that are affordable to extremely low, very-low, and/or low-income households the Proposed Alternative has been revised to include a Density Bonus Option for both Publicly Funded and Not Publicly Funded projects (Revised Proposed Alternative). The Density Bonus Option, as indicated in the William Mead example above, provides additional floor area to projects that voluntarily include restricted affordable units and provides projects the opportunity to utilize On or Off-Menu Incentives that may further assist a project to include affordable units. As the inclusion of the Density Bonus Option would incentivize the production of affordable units, the Project Alternative would not result in the disproportionate production of market rate units in the Project Area. See Section 5 of the FEIR for a description of the Revised Proposed Alternative Density Bonus Option.

Additionally, the City of Los Angeles Rent Stabilization Ordinance ensures that residents who live in the following types of dwelling units with certificates of occupancy issued before October 1, 1978 are protected from excessive rent increases:

- apartments
- condominiums
- town homes
- duplexes
- two or more dwelling units on the same lot
- mobile homes

- mobile home pads
- rooms in a hotel, motel, rooming house or boarding house occupied by the same tenant for 30 or more consecutive days

Therefore, in consideration of the long-term nature of the affordable housing commitments, the perseveration of the existing land use designations in a portion of the Project Area, and the redevelopment incentives offered by the land use designations in the Project Alternative, the Project Alternative would not directly displace affordable housing units within the Project Area. See Section 5 of the FEIR for a description of the Revised Proposed Alternative Density Bonus Option and MR 1 Housing Displacement.

27-21 The comment claims that the Original DEIR fails to analyze the impact and consistency of the Plan with the City’s Rent Stabilization Ordinance (RSO), Density Bonus Ordinance (DB Ordinance), or the Homeless Shelter Ordinance. For a discussion of the RSO please see the MR 1 on Displacement. As regards the DB Ordinance the growth anticipated by the Original DEIR assumed a potential future build-out at 4.0 FAR which captures the 3.0 FAR plus a 35% increase. And while the C2 and CM zones within the Plan are intended to be replaced with one of the Urban districts each of the Districts permits, to varying degrees, multi-family residential units. The definition of a Residential Multi-Family in the November 2010 Draft included Single Room Occupancy, residential hotels and rooming houses in its description which was intended to include homeless shelters. For clarification purposes “homeless shelters” will be added to the Residential-Multi-Family definition in the August 2012 Draft.

27-22 The comment suggests that the Plan will displace low-income households and renters and attract higher income residents who will use their vehicles and will be less inclined to use transit as compared to the current population. For the discussion on displacement please see MR1 on Displacement.

The comment also notes that census data show 40% of the Project Area population use transit or “other” means to travel to work, rather than driving. See Response to Comment 27-75 of existing and projected VMT and transit participation rates in the Project Area.

27-23 The comment claims that “Minagar & Associates, a professional traffic engineering, transportation planning, and Intelligent Transportation Systems firm, conducted a thorough peer review of the Transportation chapter of the Original DEIR, and concluded that between 6,000 and 7,000 residents in the Project Area would be displaced should CASP be implemented. (Minagar Report, p. 36). The potential displacement of at least 6,000 low income residents will have significant impacts throughout the City and the region, as displaced residents of the Project area will be forced to seek housing elsewhere. This will lead to indirect environmental impacts of the Project, as area residents may no longer have access to transit and may be required to drive to work, as discussed below, and as public services and infrastructure in the receiving communities must be expanded to serve new residents.”

For the discussion on displacement please see MR 1 on Displacement.

Additionally, the comment mischaracterizes the Minagar & Associates report, suggesting that the Minagar & Associates report states “that between 6,000 and 7,000 residents in the Project Area would be displaced should CASP be implemented.” The Minagar & Associates report states, “Three scenarios have been brought forward as potential adverse situations in which having no provisions or amendments in the CASP for adequate affordable housing might over time cause low-income residents to become displaced due to the surrounding gentrification and housing market forces (page 35).” Thus the figure cited in the comment, the displacement of 6,000 to 7,000 residents, is in fact a speculative scenario developed by Minagar & Associates for theoretically assessing how the percent of affordable housing provided will affect vehicular trip generation within the Specific Plan. The Minagar & Associates report does not present any analysis to indicate the amount of displacement that would occur under the Specific Plan. Additionally, the scenario as cited in the comment and described in the Minagar & Associates report is unlikely to ever occur. In Table 13-3 on page 13-4 of the Original DEIR, the current population (based on 2003 Census data) of the Project Area is 4,802 persons, and the forecast No Project (2035) population is 5,512 persons. Therefore, the estimated displacement of 6,000 to 7,000 residents is an over estimation of the population of the Project Area by up to approximately 1,500 persons. Additionally, while the Minagar & Associates analysis is intended to analyze the effect of the displacement of low-income residents, it assumes that all residents (regardless of income level) would be displaced under the scenario referenced in the comment. As detailed on page 13-7 of the Original DEIR, 18.5% of the residents of the study area have household incomes of \$50,000 or more. These residents would not be categorized as low-income; and therefore, would not be likely to be displaced according to the logic of the theoretical scenarios tested by Minagar & Associates.

- 27-24 The comment claims that the Original DEIR omits relevant demographic data, leading to an inconsistent description of existing conditions within the Project Area. In particular, the commenters take issue with the discussion of Study Area data, which is comprised of the four adjacent census tracts encompassing the Project Area, suggesting that it is not “the relevant data.”

As explained in Section 13 of the Original DEIR, the boundaries of the Plan Area do not coincide perfectly with the boundaries of tracts surveyed by the U.S. Census Bureau. While a minority of Study Area residents’ lives within the bounds of the Project Area – only about 35% in 2000 – corresponding data for both areas suggests strong similarities between the two. As discussed throughout Section 13, figures on demographic composition, educational achievement, housing type, and property value are all comparable, varying in the most extreme case by about one-ninth (or 11 percent) of each other.

These differences are further dwarfed by their shared, often dramatic disparity from corresponding citywide figures. Thus, it is reasonable to assume that where Project Area data was not available, Study Area data provides a fairly accurate portrait of Project Area conditions.

27-25 See Response 27-24.

27-26 The comment seeks clarification on a number of Project Area population figures provided in the Original DEIR. The figures in question include 2003 population, listed in Table 13-3 (p. 13-4); and both 2000 and 2007 population, listed in Table 13-6 (p. 13-5). The commenter asks which of the three current population figures (2000, 2003, or 2007) is used as the baseline for the environmental analysis. The baseline year for the DEIR analysis is 2007 and the baseline population is 5,304 and the text and tables in the Executive Summary as well as Chapters 1, 2, 3, 13, and 15 have been revised in Section 4 Corrections and Additions to reflect. The source for this information is the Los Angeles City Planning Demographics Research Unit.

27-27 The comment identifies an error in the citywide average income presented in Chapter 3 of the Original DEIR (p. 3-2). The correct figure is \$36,687 in 1999 dollars, not \$58,724 in 2000 dollars. See Section 4, Corrections and Additions for corrected text.

27-28 The comment implies that the Original DEIR claims “population and housing do not need to be addressed,” and suggests that the analysis fails to account for population growth and displacement.

On the contrary, the analysis does discuss population and housing impacts, finding them to be less than significant. The misunderstanding appears to arise from the following passage in the Original DEIR:

The City of Los Angeles CEQA Thresholds Guide does not directly consider population and housing growth to be significant effects on the environment. The secondary effect of the additional population growth on other potential environmental topics (such as potential transportation and public services, for example) is evaluated in other chapters of this DEIR. (p. 13-19)

The statement is not intended to disclaim responsibility for analysis, but rather to distinguish between physical impacts, on the one hand, and social or economic impacts, on the other. As specified in CEQA Guidelines Section 15064(e), social and economic factors (such as population and housing) may only be considered significant if they cause an adverse impact to the physical environment or vice versa. Particularly because the Proposed Alternative promotes mixed-use infill development in a heavily industrial area, population and housing are expected to affect the environment through secondary factors, rather than by virtue of their presence alone. Thus, those impacts are discussed in their respective chapters of the Original DEIR.

The Original DEIR discusses the impact of population growth at length in Section 13.3.2.2. See Response MR 1 Displacement for a discussion of issues concerning displacement of residents, including the re-zoning of William Mead Homes.

27-29 The comment seeks clarification on the significance findings for Population, Housing, and Employment, with particular regard to how program assumptions were calculated (e.g. Tables 13-3, 13-11). See Response 27-28 for a discussion of significance conclusions regarding Population, Housing, and Employment.

The assumptions used for this section of the Original DEIR are stated from page 13-16 to 13-18 and City of Los Angeles General Plan Objectives and Policies. Population data is drawn from references and tables cited in the text and noted on page 13-23.

- 27-30 The comment claims that the Original DEIR does not calculate projected growth in the Project Area anticipated by the Proposed Alternative.

Some confusion appears to arise from data presented in Tables 13-2 and 13-5 (pp. 13-2, 13-5), which describe projections for both the City of Los Angeles and the Study Area. As indicated at the bottom of each table, those data were provided by the Southern California Association of Governments (SCAG) in its 2008 *Regional Transportation Plan Growth Forecast*. SCAG's forecast was produced independent of the Proposed Alternative, and does not take into account the growth it would induce. Rather, the data were provided in order to better characterize the Study Area.

Table 13-3 (p.13-3) provides a population projection for the Project Area, anticipating 31,855 residents by the year 2035. As indicated in Section 13.3 (p. 13-17) and emphasized in the comment, this number is provided as an upper limit of growth accommodated by the Proposed Alternative; actual growth may depend on undetermined or unforeseeable factors. For the purposes of an environmental analysis, however, it is reasonable to consider impacts that would be caused by the maximum possible growth.

- 27-31 The comment alleges that the analysis overlooks projected population growth within the Project Area, trivializing it by framing it against citywide growth. As discussed in Response 27-28, population does not constitute a significant impact *per se*. Rather, the impact of projected population growth in the Project Area is considered in light of its secondary impacts in the corresponding chapters of the Original DEIR.

The comment further criticizes the framing of projected population growth in its citywide context by comparing it to so-called "ratio" theory. "Ratio" theory argues that when cumulative impacts (such as air pollution) are great, individual projects contributing to that impact are insignificant (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 721). However, the analysis introduces citywide context specifically to note that, as an infill development plan, the Proposed Alternative will *reduce* the strain of housing demand elsewhere in the city.

- 27-32 The comment asserts that the Original DEIR should be recirculated due to inconsistent population data. Clarifications to the data are included in Section 4 Corrections and Additions.

- 27-33 The comment reiterates the City's need for additional low and very low-income housing. The comment is noted.

- 27-34 The comment notes that the Study area has a significantly lower income level than the City overall and that the Project Area reflects a high percentage of users. These numbers are attributable to the fact that the little amount of land area devoted to housing in the

Plan area today are, in fact, either utilized for public housing or rental units restricted to low and very-low income families and seniors for 55 years.

27-35 The comment expresses concern about the Plan's impact on overcrowding yet the comment provides no facts to back up its assertion that overcrowding is already a problem. The Plan, by facilitating and encouraging the development of additional housing within the Plan area, would increase the supply of housing, and therefore reduce the potential for overcrowded conditions.

27-36 The comment states that the Original DEIR fails to adequately analyze the impacts of the Proposed Alternative on the Project Area's jobs-housing balance but provides no facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of its position.

27-37 The comment disputes the conclusion that the Proposed Alternative will accommodate the creation of local jobs appropriate to its growing population. In particular, it claims that the Proposed Alternative "does not specify whether... jobs will be manufacturing, commercial, retail, or some kind of secondary or tertiary category of jobs, or if they will be temporary construction jobs." However, the Original DEIR explicitly states, "Retail and commercial businesses, along with custom manufacturing and light industrial uses, are accommodated in the Proposed Alternative" (p. 13-20). The comment also notes the lack of discussion concerning green jobs.

The character and suitability of anticipated employment growth are not environmental impacts that require analysis in an EIR under CEQA. Nevertheless, the commenters' concerns are noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

27-38 The comment expresses the concern that new residents of the Project Area may work jobs others than those created by the Proposed Alternative, leading to increased vehicle travel and attendant environmental impacts. The Proposed Alternative encourages the development of mixed uses and a diverse employment base.

It is anticipated that many new residents of the Project Area could take advantage of proximity to workplaces in the Specific Plan area, while others could work in jobs rich centers such as Downtown Los Angeles, Los Angeles County/USC Medical Center, or other adjacent jobs centers that lack sufficient housing to accommodate anticipated future demand.

As noted in Table 2-2 on page 2-13 of the Original DEIR, the current number of jobs in the Project Area is 6,791, and the current number of dwelling units is 1,266, a ratio of 5.36 jobs per dwelling unit, representing a significant existing jobs/housing imbalance. The Proposed Alternative is anticipated to have 10,546 jobs, and 8,776 dwelling units, a ratio of 1.20 jobs per dwelling unit, bringing the jobs/housing ratio into a closer balance. The comment incorrectly states that the Project would lead to a "housing-jobs imbalance." The Project will address a significant existing jobs/housing imbalance: therefore, the impacts detailed in the comment (traffic, air quality, etc.) would not be

expected because the Project would be correcting the current jobs/housing imbalance. Providing sufficient housing units closer to jobs rich centers, such as Downtown Los Angeles, will improve traffic, air quality, and greenhouse gas emissions by reducing the frequency and length of vehicle trips and thus reducing vehicle miles traveled (VMT).

- 27-39 The comment alleges that the analysis fails to account for the displacement of existing businesses and suggests that the Original DEIR should have analyzed whether the potential new locations for businesses displaced by the Plan would require their employees to commute by automobile. Under the Preferred Alternative, an increase in the amount jobs within the Project Area is anticipated. As shown in Table 2-2 on page 2-13 of the Original DEIR, growth from 6,791 jobs currently to 10,546 jobs is proposed under the Preferred Alternative. Businesses that leave the Plan Area would be replaced by new businesses, and additional business would locate to the area therefore increasing the number of employees overall who are able to access their jobs using transit. As indicated in Table 4-9 on page 4-51 of the Original DEIR, increasing the number of jobs and residences near transit would reduce regional VMT as both employers and residents relocate from areas of the region less accessible by transit to the Specific Plan Area.
- 27-40 The comment argues that the Original DEIR fails to analyze the Plan's impacts on the City's jobs-housing balance. As detailed above in the response to Comment 27-39, the Plan would have a positive effect on the housing-jobs balance, and so the mitigation measure described in the comment would not be necessary.
- 27-41 The comment suggests that the Original DEIR should consider including a local hiring requirement that could be undertaken by the CRA when the area is adopted as a Redevelopment Project Area. Unfortunately, with the demise of the CRA and the establishment of the Plan area as a Redevelopment Project Area in the foreseeable future this mitigation is not feasible.
- 27-42 The comment states that the Original DEIR failed to analyze and mitigate the Project's air quality and greenhouse gas emissions. For a discussion on air quality impacts see Response to Comment 2-5, 2-6, 2-7, and 2-8. For discussion on greenhouse gas impacts see Response to Comment 27-50 through 27-64.
- 27-43 The comments suggests that the Original DEIR is deficient in analyzing the construction and operational impacts to Air Quality and to substantiate the calculation to VMT. Portions of the air quality analysis were revised and recirculated in the RP-DEIR on May 31st, 2012. And, the CalEEMod input tables which formed the basis of the revised analysis in the RP-DEIR are included as Appendix A2 of the FEIR.

Table 4-8 (page 4-51) of the Original DEIR presents the VMT estimates of the proposed project. The traffic study, which provided the underlying transportation analysis incorporated into Chapter 4 of the Original DEIR, is included as Appendix III of the RP-DEIR. The travel demand forecasting (TDF) model developed for the CASP, or Proposed Alternative, which was developed using state of the practice guidelines, was used to estimate project related trips. As detailed in the Response to Comment 27a-2, the TDF model is based on the SCAG model, with additional detail added to the subarea

around the Proposed Alternative. The Fehr & Peers model development report (see appendix 4C) was provided in the Original DEIR, and the SCAG model development report, which provides detailed discussion of the model structure and parameters, is provided as Appendix A4 in the FEIR. To model the effects of the Proposed Alternative, the socioeconomic data (jobs, housing, population, etc.) forecast for the Project Area under the Proposed Alternative were input into the Project Area TAZs of the Proposed Alternative's TDF model. Trip generation rates for the Proposed Alternative were determined based on the calibrated SCAG trip generation rates. The locally valid Proposed Alternative's sub area model followed the traditional 4 step process of trip generation, geographic distribution, modal split and assignment of trips to the roadway/transit network.

The model was used to estimate the vehicle miles traveled (VMT) for the Proposed Alternative in accordance with state of the practice procedures. The method that was used is commonly referred to as the Origin-Destination (OD) method and tracks all trip generated by a geographic area across the regional network. As described on page 4-50, Project related VMT estimates were developed by isolating only the modeled trips that start or end within the Project Area (including external trips that travel into the Plan Area, trips that start in the Project Area and travel outside, and trips that are fully internal to the Plan Area).

- 27-44 The comment asserts that the Original DEIR has not included all feasible mitigations but provides no facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of its position. Nevertheless, the air quality analysis revised and recirculated in the RP-DEIR on May 31st, 2012 to address multiple air quality impacts. Additional mitigation was included in the RP-DEIR to mitigate impacts to the maximum extent feasible. See sections 2.A-I, 2.A-II, 2.A-III of the RP-DEIR.
- 27-45 The comment states that construction mitigation in the Original DEIR lack sufficient detail to assure the public that impacts will be reduced to below the level of significance, and suggests the construction mitigations be modified to account for future technological advances. The portion of the Air Quality Section that addresses air quality construction emissions and mitigation has been revised and recirculated in the RP-DEIR on May 31st, 2012. The mitigation recommended by SCAQMD in their comment letter was incorporated as Mitigation Measure Air Quality 12. See Response to Comments 2-9 and sections 2.A-II, and 2.A-III of the RP-DEIR.
- 27-46 The comment that CARB recommends a 500 feet siting distance of sensitive receptors from freeways is noted. Mitigation Measure Air Quality 2 has been revised to include the 500-foot siting distance from freeway sources recommended by CARB unless an HRA is conducted to determine that the buffer is not necessary to reduce cancer and non-cancer risks from freeway TAC sources. Mitigation measures Air Quality 3 through 10 have been added to incorporate measures designed to reduce TAC exposure to sensitive land uses, such as instillation of air filtration systems and planting a vegetated screen for new sensitive land uses within recommended buffer distances to TAC sources. See Response to Comment 2-5.

27-47 The comment states that the Original DEIR fails to define the contents of or standards of a “Toxic Air Contaminant assessment” and that the City cannot defer analysis by providing an HRA after a project is developed, but define the protocol of an HRA now. See Response to Comment 2-5 and Section 2.A-1 of the RP-DEIR regarding contents, criteria and standards of an ‘acceptable’ HRA. TAC assessment is interpreted here to mean an HRA.

27-48 The comment states that the health risk impact analysis should be strengthened with more explicit requirements related to the siting of residential and sensitive land use. Because sensitive receptors would potentially be permitted in proximity to TAC sources under the siting distances to industrial uses prescribed in the CARB Air Quality and Land Use Handbook, the discussion of health risk impacts related to TAC sources was revised to be considered significant and unavoidable, and this section was recirculated on May 31st, 2012 for public review pursuant to Section 15088.5 of the CEQA Guidelines.

In response to the discussion of CARB’s Air Quality and Land Use Handbook, see Response to Comment 2-6. Mitigation Measure Air Quality 2 has been revised in the RP-DEIR to include the 500-foot siting distance from freeway sources recommended by CARB unless an HRA is conducted to determine that the buffer is not necessary to reduce cancer and non-cancer risks from freeway TAC sources.

The comment summarizes the findings of multiple local, national and international studies that demonstrate health impairments of children that attend schools that are located in proximity to busy roads and freeways. The schools are permitted in the Urban Village, Urban Innovation, and Urban Center land use designations, the LAUSD siting criteria of prohibiting schools to be sited with 500 feet of a freeway would apply under the Proposed Alternative.

The comment recommending the Original DEIR to provide protection for sensitive land uses proposed to be within 1,500 feet of the two freeways is noted. Mitigation measures Air Quality 3 through 10 have been added in the RP-DEIR to require the installation of air filtration systems and planting a vegetated screen for new residential uses within recommended buffer distances to TAC sources.

See Response to Comment 2-5 and 2-6 as well as Section 2.A-1 of the RP-DEIR.

27-49 The comment asserts that the Original DEIR fails to properly analyze and mitigate the Proposed Alternative’s greenhouse gas (GHG) emissions. It also asserts that the analysis employed confusing baseline data, does not quantify future projection and does not provide clear mitigation measures. The comment further states that because of this that the noted deficiencies require revision to provide a complete and adequate analysis.

For responses related to baseline data, see response to comment 27-50. The portion of the GHG Section related to future projections, corresponding impacts and mitigation has been revised and recirculated in the RP-DEIR on May 31st, 2012 in response to the comment. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts.

27-50 The comment states that the GHG baseline data in the Original DEIR is inconsistent and confusing and that the Original DEIR did not report the most recent national, state and local baseline data available at the time of the November 1, 2010 preparation of the Initial Study. The comment also points out several data inconsistencies in the Original Draft that refer to the baseline year applied in the text.

Table 16-2 has been revised in the Corrections and Additions to report the most recent baseline data available at the preparation of the initial study and is included as follows: United States emissions in 2009 was 7,150 MMTCO₂-e, California emissions in 2008 was 478 MMTCO₂-e, and City of Los Angeles emissions in 2007 was 50.3 MMTCO₂-e. The corresponding per capita emissions were also revised as follows: 21.7 TCO₂-e/person (United States in 2009), 14.1 TCO₂-e/person (California in 2008), and 12.9 TCO₂-e/person (City of Los Angeles in 2007). See Section 4 Corrections and Additions for corresponding text revisions.

It should be noted that for purposes of concluding whether the Proposed Alternative will result in an impact to GHG emissions, the use of baseline data is relevant where it has been used to establish an emission reduction target required by AB 32 and derived by CARBs Scoping Plan. The methodology and threshold applied in the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts.

27-51 The comment states that the Original DEIR makes no effort to describe existing GHG emissions in the Project Area or projected GHG emissions of the Proposed Alternative, and fails to make a connection with the national, state and citywide emissions with the Proposed Alternative GHG analysis.

Proposed Alternative's GHG emissions were quantified using CalEEMod software, with the results output tables included in Appendix 11A of the Original DEIR. The CalEEMod model run estimated that 211,861.37 metric tons (MT) per year of existing GHG emissions (reported in CO equivalent) is attributed the Project Area, while the Proposed Alternative would result in 596,172 MT per year of mitigated operational GHG emissions (reported in CO equivalent). However, the comment is accurate in that the total GHG emissions were not included in Chapter 16 of the Original DEIR. In response to related issues addressed in other responses, the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. As part of the revised analysis in the RP-DEIR, an emission estimate was recalculated in CalEEMod, and the results were included in Section 2.B of the RP-DEIR. The revised CalEEMod model run estimated that as of 2011, 110,872 MT of annual emissions were attributed to the Project Area, while the Proposed Alternative would result in 235,812 MT of mitigated operational GHG emissions. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts.

It should be noted that for purposes of concluding whether the Proposed Alternative will result in an impact to GHG emissions, the use of statewide baseline data is relevant where it has been used to establish an emission reduction target required by AB 32 and derived

by CARBs Scoping Plan.⁹ The methodology and threshold applied in the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts, as well as Corrections and Additions to revisions to the RP-DEIR.

27-52 The comment states that the Original DEIR misuses the rationale under which circumstances a categorical exemption could be applied as advanced by the California Air Pollution Control Officers Association’s (CAPCOA) CEQA and Climate Change guidance document. The comment is taken under consideration and while Page 16-12 of the Original DEIR accurately states CAPCOA’s language, the comment is correct in that the Original DEIR mistakenly applied the Categorical Exemption criteria to the Proposed Alternative.

The Original DEIR stated that it adopted a “zero-emission” threshold in evaluating the Proposed Alternative’s GHG impacts. A “zero-emission” threshold is based on a determination that any degree of project-related increase in GHG emissions would contribute considerably to climate change and therefore would be a significant impact. In applying this approach, a lead agency needs to demonstrate that a project can fully mitigate all increases in GHG emissions so as not to result in a significant impact on climate change. After further consideration, it was determined that the consequences of this approach would have costly and impractical implications. Given this, it was decided to pursue a combined quantitative and qualitative approach that represents the best available option in accommodating future development while taking vigorous action to reduce GHG emissions. The methodology and threshold applied in the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts.

27-53 The comment states that quantification of GHG emissions was not included in the Original DEIR. See Response to Comment 27-51 and Section 2.B of the RP-DEIR for the revised quantification of GHG impacts.

27-54 The comment states that the Original DEIR did not follow GHG impact evaluation guidance available at the time of preparation and refers to guidance published by the Attorney General’s Office, SCAQMD and CARB. While guidance has been available as to methodology in calculating greenhouse gas emissions, no agency with jurisdiction in Southern California has adopted a specific GHG threshold necessary in determining a significant impact.¹⁰ In October of 2008, SCAQMD released the Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold. The Draft Guidance Document discusses a tiered threshold approach discussed below. Currently, the Attorney General’s website refers to the CAPCOA CEQA and Climate Change guidance document.¹¹

⁹ CARB Scoping Plan

¹⁰ The South Coast Air Quality Management District has formed a GHG Significance Threshold Working Group. More information on this Working Group is available at www.aqmd.gov/ceqa/handbook/GHG/GHG.html.

¹¹ The Office of the Attorney General website <http://oag.ca.gov/environment/ceqa/measures> (accessed on 06/29/12)

In their January 2008 CEQA and Climate Change white paper, CAPCOA identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. In its white paper, the CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency. One of the potential approaches identified in the CAPCOA White Paper, Threshold 1.1¹², would require a project to meet a percent reduction target. This target would be based on the average reduction from “business-as-usual”¹³ emissions identified by CARB as necessary to satisfy AB 32’s mandate of returning to 1990 levels of GHG emissions by 2020. This is similar to the Compliance Option 1 of Tier 4 of SCAQMD’s Draft Interim Guidance Document.¹⁴ As part of their Draft Guidance Document recommendations, SCAQMD specifically recommends against a “zero-based” threshold.¹⁵ See Response to Comment 27-52 for discussion on the “zero-based” threshold approach. The methodology and threshold applied in the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts.

- 27-55 The comment states that the Original DEIR does not quantify projected GHG emissions of the Proposed Alternative, and should show how the GHG increases will impact global warming. See Response to Comment 27-51 for a discussion of the quantification of the Proposed Alternative’s GHG emissions in the Original DEIR.

In response to related issues addressed in other responses, the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. As part of the revised analysis in the RP-DEIR, an emission estimate was recalculated in CalEEMod, and the results were included in Section 2.B of the RP-DEIR. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts.

- 27-56 The comment states that the Original DEIR falsely assumes that the design characteristics of the Proposed Alternative will lead to reduced personal automobile travel. The comment further asserts that the Proposed Alternative lacks affordable housing incentives and would result in displacement of lower income residents by higher income residents that are more likely not to rely on transit as a mode of transportation. The comment suggest that the combination of lower transit ridership in the Project Area and the higher auto dependence of displaced lower income residents to suburbs will result in higher VMT without proper protections in place. See Response to Comment 27-20 and 27-22 for existing and projected VMT and transit participation rates in the Project Area.

¹² CAPCOA CEQA and Climate Change. page 32

¹³ The Scoping Plan defines “business-as-usual” as emissions in the absence of greenhouse gas reduction measures (i.e., the 2020 “business-as-usual” emissions inventory is forecasted based on the 2002 to 2004 statewide average annual emissions and does not take credit for, inter alia, reduction from 2005 Title 24, Assembly Bill 1493 greenhouse gas emissions reduction standards for vehicles, the California Low Carbon Fuel Standard, or full implementation of the Renewables Portfolio Standard

¹⁴ SCAQMD. October 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, pg 3-15

¹⁵ SCAQMD Website <http://www.aqmd.gov/hb/2008/December/081231a.htm> (accessed on 06/29/12)

27-57 The comment states that the Original DEIR does not quantify projected GHG emissions of the Proposed Alternative, and should show how the GHG increases will impact global warming. See Response to Comment 27-51 for a discussion of the quantification of the Proposed Alternative's GHG emissions in the Original DEIR. For discussion on the application of the "zero-emission" threshold see Response to Comment 27-52.

In response to related issues addressed in other responses, the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. As part of the revised analysis in the RP-DEIR, an emission estimate was recalculated in CalEEMod, and the results were included in Section 2.B of the RP-DEIR. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts, conformance with the Green LA Climate Action Plan (CAP) and discussion of the mitigation measures.

27-58 The comments states that the Original DEIR did not provide information as to the additional treatment capacity necessary for LADWP to supply the recycled water to the Project Area, nor evaluated the additional pipeline and transmission, however, the comment does not provide any facts, or evidence based on facts that an additional impact would result to LADWPs treatment capacity or from the build out of additional conveyance infrastructure. The recycled water system is being developed as part of LADWP's planning efforts^{16 17} and overall application will be developed independently of the Proposed Alternative. LADWP will disclose the additional treatment capacity needs, as well as corresponding energy use as part of the CEQA required environmental analysis as necessary to expand the use of recycled water in the City. New pipes for the recycled water system that would be delivered to the Project Area would be built within existing right of way and not result in additional environmental impacts.

The comment states that the Original DEIR does not state how the per capita energy use data in Table 16-3 is related to the CalEEMod output in Appendix 11A of the Original DEIR. As stated in Response to Comment 27-51, the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. As part of the revised analysis in the RP-DEIR, an emission estimate was recalculated in CalEEMod, and the results were included in Section 2.B of the RP-DEIR. See Section 2.B of the RP-DEIR for the revised CalEEMod analysis. The output Energy Detail of the CAIEEMod has been reproduced and included as Appendix A3 of this FEIR. See Correction and Additions for a revised Table 16-3 that is based on the revised CalEEMod analysis.

27-59 The comment states that the Original DEIR does not quantify projected GHG emissions of the Proposed Alternative. See Response to Comment 27-51 for a discussion of the quantification of the Proposed Alternative's GHG emissions in the Original DEIR. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts.

¹⁶ LADWP. May 2008. Water Supply Action Plan, "Securing LA's Water Supply"

¹⁷ LADWP. 2010 Urban Water Management Plan

- 27-60 The comment states that on Page 17-8 of the Original DEIR erred in applying a “ratio theory” in determining that the Proposed Alternative would have a less than significant cumulative GHG impacts. Page 17-8 states the following:

“Greenhouse gas (GHG) emissions lead to impacts that are by definition cumulative and global in scope. Due to projected population growth in Los Angeles and the state of California, there will be an increase in GHGs whether they occur in the Project Area or elsewhere in the state. As specified in Chapter 16 (Energy and Greenhouse Gases), if a project contributes an increase in GHG emissions, then the project’s GHG emissions would be cumulatively considerable and mitigation would be required where feasible. The assumption of this “zero-threshold” indicates that the Proposed Alternative will be required to adopt all feasible mitigation measures. These have been taken into consideration in the quantitative assessment of GHG emissions discussed in Chapter 16.”

Based on the above section, the Original EIR did not apply a “ratio theory” but instead based an impact conclusion by applying a “zero-emission” threshold. As stated in response to Comment 27-52, the methodology and threshold applied in the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts.

- 27-61 The comment states that the Original DEIR inappropriately relies on the Green LA CAP for mitigation measures. As stated in Response to Comment 27-51, the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. As part of the revised analysis in the RP-DEIR, GHG emissions were quantified that would be specifically attributed to the project-specific land use strategies, and mitigation measures of the Proposed Alternative, as well as City-wide programs that would also serve to reduce GHG emissions of the Proposed Alternative. The inclusion of project specific mitigation measures and City-wide programs that would reduce GHG impacts is consistent with preliminary guidance by the Governor’s Office of Planning and Research (OPR), SCAQMD, and CAPCOA and conforms to Section 15064.4(b)(3) of the CEQA Guidelines. In addition, as part of the impact methodology in the revised analysis included a qualitative assessment of the Proposed Alternative to determine if it conflicts with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, the Proposed Alternative was evaluated to determine conformance with the Green LA CAP. See Response to Comment 27-62 for more discussion on project mitigation measures. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts, conformance with the Green LA CAP and discussion of the mitigation measures.

- 27-62 The comment states that the Original DEIR did not include mitigation measures to address impacts related to increased usage of natural gas and oil and increases in GHG emissions, and failed to specify how the Green LA CAP will mitigate GHG impacts of the Proposed Alternative. The comment further states that the Green LA CAP provides no binding emissions reduction target that the Proposed Alternative must meet, but only general City-wide GHG reduction goals.

As stated in Response to Comment 27-51, the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. As part of the revised analysis in the RP-DEIR, GHG reductions of the Proposed Alternative were shown to be attributed to implementation of City-wide programs, project-specific land use strategies, as well as project specific mitigation measures. City-wide programs attributed to the Green LA CAP that apply to the project include diversification of LADWP's power supply to include a renewable energy portfolio, conformance of increased energy efficient building standards and increased water conservation requirements in plumbing fixtures and landscape areas. The Proposed Alternative will also include a requirement to supply 20 percent of non residential and 10 percent of residential energy demand with renewable energy generation, exceeding energy conservation goals of most if not all other plans of this scale in the City of Los Angeles. The RP-DEIR analysis found that the build out of the Mitigated Proposed Alternative (2035) would result in 38 percent less annual GHG emissions than as compared to the Unmitigated Growth ("Business as Usual") scenario (2035). The project specific mitigation measures include the provision of a mix of uses in proximity to local and regional transit, and peak-hour shuttle services, bicycle and pedestrian measures such as sidewalks, bike lanes, and local-serving retail, and incorporation of a variety of TDM measures that would all serve to reduce vehicle trips. A revised CalEEMod model run was conducted that accounted for these measures. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts, conformance with the Green LA CAP and discussion of the mitigation measures.

In addition, as part of the impact methodology in the revised analysis included a qualitative assessment of the Proposed Alternative to determine if it conflicts with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, the Proposed Alternative was evaluated to determine conformance with specific measures of the Green LA CAP. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts, conformance with the Green LA CAP and discussion of the GHG mitigation measures.

27-63 The comment states that Original DEIR does not explain where and how the concepts of Green LA CAP were embedded in the Proposed Alternative. See Response to Comment 27-62 for clarification of the role of the Green LA CAP and the Proposed Alternative.

27-64 The comment states that Original DEIR applies faulty logic in arguing the existing of Green LA CAP will be sufficient to mitigate GHG impacts of the Proposed Alternative. See Response to Comment 27-62 for clarification of the role of the Green LA CAP and the Proposed Alternative.

The comment states that the increase in use of natural gas and oil would result in the Proposed Alternative in comparison to the Existing (base) conditions as shown in Table 16-3 of the Original DEIR contradicts less than significant impact in applying the standards as described in Section 16.2.1.

Comment is noted and in response the standards discussed in Section 16.2.1 and impact evaluation in Section 16.3.2.1 have been revised in this FEIR. The CEQA Guidelines Appendix F: Energy Conservation was developed to provide guidance to lead agencies in

determining whether a project would be substantially contributing to the wasteful or inefficient use of energy resources. Appendix F of the CEQA Guidelines lists decreasing overall per capita energy consumption and decreasing reliance on fossil fuels such as coal, natural gas and oil as a number of means of achieving the goal of “wise and efficient use of energy”. However, in listing the means to achieving the goal, the Appendix F Guidelines does not create standards or thresholds as a means to determine a significant impact in meeting or deviating from the goal.

Appendix F of the CEQA Guidelines includes a potential list of criteria that a lead agency may apply when determining if a project conflicts with energy conservation or efficiency goals which may include a evaluating a project's energy requirements and its energy use efficiencies, the degree by which a project complies with energy efficiency standards and a host of other topics. Appendix F of the CEQA Guidelines requires that “potentially significant energy implications of a project shall be considered in an EIR.” However, it is noted that the CEQA Guidelines do not establish thresholds under which a project will be seen to conform or obstruct energy conservation or efficiency goals.

The City of Los Angeles “L.A. CEQA Thresholds Guide” (2006) is the only source applicable to the Proposed Alternative that sets standards of significance with respect to energy use. Based on applying the L.A. CEQA Thresholds Guide a significant impact would occur if:

- The project would require major new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;
- The needed energy supply infrastructure was not anticipated by adopted plans; and
- The project fails to incorporate energy conservation measures in the project design and/or operations.

In light of the criteria above, it follows that an overall increase in natural gas and oil usage does not imply a significant impact, but whether such increase is deemed to be wasteful and inefficient and unnecessary. Long term energy planning for the City of Los Angeles is conducted by LADWP through the Integrated Resource Plan (IRP). As a function of the IRP, LADWP forecast future energy needs based on a retail sales forecast, which projects growth in their different customer classes taking into account population projections, normalized weather, employment and personal consumption. The IRP accommodates growing demand by diversifying energy sources (by greatly expanding renewable energy) and developing demand side resources such as energy efficiency programs. As discussed in Chapter 13 of the Original DEIR, the Proposed Alternative will result in a substantial increase in population growth in the Project Area, however the anticipated population accommodate by the Proposed Alternative is six percent of the total population growth anticipated for the City of Los Angeles for 2035 as established by SCAG in the 2012 RTP/SCS¹⁸, and targeted in a location in the City that could absorb

¹⁸ SCAG Population Forecast for the City of Los Angeles Sub-region, SCAG RTP-SCS, Growth Forecast Appendix, April 2012

more growth in compliance with SB 375. As such, the overall growth in energy demand in the Project Area is consistent with the IRP, especially since the Proposed Alternative includes programs to reduce energy demand from oil and gas resources as stated below.

As stated in Response to Comment 27-51, the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. As part of the analysis in the RP-DEIR, CalEEMod model was re-run and Table 16-3 was revised to incorporate and compare the energy use of the Mitigated Proposed Alternative (2035) with the following scenarios consistent with the revised GHG analysis in the RP-DEIR: Existing (2011), No Project Alternative (2035), and Unmitigated Growth (“Business as Usual”) scenario (2035).

The impact evaluation of energy resources in Section 16.3.2.1 of the Original DEIR has been revised to reflect the revised GHG evaluation methodology in the RP-DEIR and to determine what extent the Proposed Alternative fails to incorporate energy conservation measures. As shown in revised Table 16-3 in the Corrections and Additions, the build out of the Mitigated Proposed Alternative (2035) would result in 52.3 percent reduction in electricity demand and 11.6 percent reduction natural gas and oil as compared to the Unmitigated Growth “Business as Usual” 2035 scenario (BAU). This is consistent with the RP-DEIR analysis, which found that the build-out of the Mitigated Proposed Alternative (2035) would result in 46 percent less annual GHG emissions.

The Energy Detail of the CAIEEmod has been reproduced and included as Appendix A3 to this FEIR. Also shown in the revised Table 16-3, the Proposed Alternative would have lower per capita energy consumption than all other scenarios including the Existing (2011) conditions.

The City-wide programs attributed to the Green LA CAP that apply to the project include diversification of LADWP’s power supply to include a renewable energy portfolio, conformance of increased energy efficient building standards and increased water conservation requirements in plumbing fixtures and landscape areas. However, conformance with the Green LA CAP is only part of the measures that are shown to reduce the Proposed Alternatives energy usage and corresponding reliance on oil and natural gas. The Proposed Alternative will include a requirement to supply 20 percent of non residential and 10 percent of residential energy demand with renewable energy generation, exceeding energy conservation goals of most if not all other plans of this scale in the City of Los Angeles. Therefore, the revised analysis concludes that the Proposed Alternative’s impact relating to inefficient use of energy resources is considered to be less than significant.

See Corrections and Additions for revisions to text on Page 16-11 in regard to standards of significance for energy conservation. See Corrections and Additions for revisions to text on Pages 16-14 in regard to impact evaluation of Impact Energy and Greenhouse Gases 1 in addition to the corresponding Table 16-3 revisions that is based on the revised CalEEMod analysis. See Appendix A3 of this FEIR for the revised CalEEMod output energy detail tables.

27-65 The comment suggests that the Original DEIR fails to acknowledge that measures to reduce VMT may not succeed because the comment assumes that new population to the Plan Area will have higher-incomes and will drive. As detailed in the response to Comment 27-75, TDM strategies that are complimentary with TOD land use strategies have been developed to ensure that additional residents in the Proposed Alternative will use transit, walk, and bike modes at least at levels similar to existing area residents. Additionally, as detailed in the response to Comment 27-20, General Plan objectives to incentivize affordable housing will be supported by the Project.

27-66 The comment states that the Original DEIR fails to quantify how discrete mitigation measures will reduce GHG impacts and references a recent California Court of Appeals case that issued a ruling based on “vaguely described” GHG emissions concluding that the Original DEIR lacks adequate mitigations to satisfy CEQA.

As stated in Response to Comment 27-51, the GHG analysis of the Proposed Alternative was revised and recirculated in the RP-DEIR on May 31st, 2012. As part of the revised analysis in the RP-DEIR, GHG reductions of the Proposed Alternative were shown to be attributed to implementation of City-wide programs, project-specific land use strategies, as well as project specific mitigation measures. As part of the revised analysis in the RP-DEIR, an emission reduction estimate attributed to City-wide programs, project design features and mitigation measures were recalculated in CalEEMod, and the results were included in Section 2.B of the RP-DEIR. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts.

27-67 The comment suggests that the Original DEIR does not include an conclusive list of mitigation measures and further asserts that an increase in affordable housing is a practical and feasible mitigation to reduce traffic and GHG emissions. As detailed in the response to Comment 27-20, General Plan objectives to incentivize affordable housing will be supported by the Proposed Alternative. The Density Bonus Program and other City wide measures will incentivize the development of affordable housing within the Specific Plan area. In addition, the comment fails to show how the total balance of mitigation measures found in the CAPCOA white paper, or the Attorney General’s Office publication are necessary in order to reduce GHG impacts to below the level of significance. Per Section 15041(a) of the CEQA Guidelines, CEQA limits lead agencies authority in applying mitigation measures where a nexus is not clearly demonstrated and the measures are not shown to be rationally proportional to reduce the impacts to below the level of significance. The comment fails to provide facts, or evidence based on facts that either of the two legal tests mentioned are satisfied here in order to compel inclusion of the balance of mitigation measures referenced in these documents.

27-68 The comment summarizes a list of actions that must be taken to reduce greenhouse gas emissions per the California Attorney General, including a long list of transportation related measures. The comment also suggests that this list of actions must be incorporated in the Project, and if not incorporated, the revised and recirculated DEIR must explain why they are infeasible. In order to reduce impacts to the maximum extent feasible, the City must also require developers to comply with regulatory requirements,

such as SCAQMD regulations, that are in effect at the time building permits are approved.” As will be evident from the list below most of the suggested items are already included in the Project. The list below includes each of the suggested mitigations followed by a response in *italics* that describes the requirement described in the Project:

Energy Efficiency

Use light-colored roofing materials to deflect heat from buildings.
Included as a requirement in the Resource Conservation Section of the Plan.

Incorporate green building practices and design elements.
All projects are subject to the new Cal Green Code and additional requirements are set forth in the Resource Conservation Section of the Plan.

Meet recognized green building and energy efficiency benchmarks
All projects are subject to the new Cal Green Code and Title 24 and additional requirements are set forth in the Resource Conservation Section of the Plan.

Install energy efficient lighting, heating and cooling systems, appliances, equipment, and control systems.
All projects are subject to the new Cal Green Code and Title 24 and additional requirements are set forth in the Resource Conservation Section of the Plan.

Use passive solar design.
All projects are subject to the new Cal Green Code and Title 24 and additional requirements are set forth in the Resource Conservation Section of the Plan.

Use light colored “cool” roofs and cool pavements.
Included as a requirement in the Resource Conservation Section of the Plan.

Install efficient lighting for traffic, street, and other outdoor lighting.
The City has efficient lighting standards that it already employs and the Plan includes exterior lighting requirements in the Urban Design Regulations Section of the Plan.

Reduce unnecessary outdoor lighting
See Urban Design Regulations Section of the Plan.

Use automatic covers, efficient pumps and motors.
Included in Resource Conservation Section of the Plan.

Provide education on energy efficiency to residents, customers and/or tenants.
An on-going effort and responsibility of DWP.

Renewable Energy and Energy Storage

Meet “reach” goals for building energy efficiency and renewable energy use

All projects are subject to the new Cal Green Code and Title 24 and additional requirements are set forth in the Resource Conservation Section of the Plan.

Install solar, wind, and geothermal power systems and solar hot water heaters.
All projects are subject to the new Cal Green Code and a renewable energy source requirement set forth in the Resource Conservation Section of the Plan.

Install solar panels on unused roof and ground space and over carports and parking areas.
All projects are subject to the new Cal Green Code and a renewable energy source requirement set forth in the Resource Conservation Section of the Plan.

Where solar systems cannot be feasibly incorporated into the project at the outset, build “solar ready” structures.
All projects are subject to the new Cal Green Code which already requires this.

Incorporate wind and solar energy systems into agricultural projects where appropriate.
All projects are subject to the new Cal Green Code and a renewable energy source requirement set forth in the Resource Conservation Section of the Plan.

Include energy storage where appropriate to optimize renewable energy generation systems and avoid peak energy use.
All projects are subject to the new Cal Green Code and a renewable energy source requirement set forth in the Resource Conservation Section of the Plan.

Use on-site generated biogas, including methane, in appropriate applications.
All projects are subject to the new Cal Green Code and a renewable energy source requirement set forth in the Resource Conservation Section of the Plan.

Use combined heat and power (CHP) in appropriate applications.
All projects are subject to the new Cal Green Code and a renewable energy source requirement set forth in the Resource Conservation Section of the Plan.

Water Conservation and Efficiency

Incorporate water-reducing features into building and landscape design.
Included in Resource Conservation and Parks and Open Space Standards of the Plan.

Create water-efficient landscapes.
Included in Resource Conservation and Parks and Open Space Standards of the Plan.

Install water-efficient irrigation systems and devices, such as soil moisture based irrigation controls and other water-efficient irrigation methods.
Included in Resource Conservation and Parks and Open Space Standards of the Plan.

Make effective use of graywater for landscape irrigation.
The use of graywater is currently limited to single family homes and therefore is not an applicable solution in this area. Projects will be required though to install purple pipe

for their landscaping irrigation to enable a hook-up to the recycled water system once it is available.

Implement low-impact development practices that maintain the existing hydrology of the site to manage storm water and protect the environment.

Required of all projects in the City per the recently adopted Low-Impact Development Ordinance.

Devise a comprehensive water conservation strategy appropriate for the project and location.

Included in Resource Conservation and Parks and Open Space Standards of the Plan.

Design buildings to be water-efficient. Install water-efficient fixtures and appliances.

Included in Resource Conservation Standards in the Plan.

Offset water demand from new projects so that there is no net increase in water use.

Not feasible given the extent of new development planned for this area.

Provide education about water conservation and available programs and incentives.

An on-going effort of DWP.

Solid Waste Measure

Reuse and recycle construction and demolition waste.

Already a City requirement.

Integrate reuse and recycling into residential industrial, institutional and commercial projects.

Included in the Performance Standards Section of the Plan.

Provide easy and convenient recycling opportunities for residents, the public, and tenant businesses.

Included in the Performance Standards Section of the Plan.

Provide education and publicity about reducing waste and available recycling services.

The Bureau of Sanitation regularly provides education and information about waste reduction and recycling.

Land Use Measures

Ensure consistency with “smart growth” principles- mixed-use, infill, and higher density projects that provide alternatives to individual vehicle travel and promote the efficient delivery of services and goods.

The Plan has been recognized as a LEED-ND project.

Meet recognized “smart growth” benchmarks.

The Plan has been recognized as a LEED-ND project.

Educate the public about the many benefits of well-design, higher density development. An on-going citywide effort.

Incorporate public transit into the project's design.

The Plan is well situated with access to frequent light rail transit service as well as rapid and local bus service.

Preserve and create open space and parks. Preserve existing trees, and plant replacement trees as a set ratio.

Included in the Parks and Open Space Standards of the Plan.

Develop "brownfields" and other underused or defunct properties near existing public transportation and jobs.

Any project on a brownfield site will be required to mitigate the site to standards identified by the governing agency. See the Mitigation Monitoring Plan.

Include pedestrian and bicycle facilities within projects and ensure that existing non-motorized routes are maintained and enhanced.

Included as standards in the Urban Design and Street Standards of the Plan.

Transportation and Motor Vehicles

- Meet an identified transportation-related benchmark.

As a LEED_ND Project the multiple land use, transportation, conservation, and urban design requirements will all contribute to the region's goal of reducing its VMT.

- Adopt a comprehensive parking policy that discourages private vehicle use and encourages the use of alternative transportation.

The project includes the policy of unbundled parking (detailed on page 4-46 of the Original DEIR), as well as parking maximums (detailed on page 2-18 of the Original DEIR) to discourage private vehicle use and encourage the use of alternative transportation modes.

- Build or fund a major transit stop within or near the development.

Two Gold Line light rail stations are already contained within the Specific Plan area.

- Provide public transit incentives such as free or low-cost monthly transit passes to employees, or free ride areas to residents and customers.

Transit pass subsidies are included in proposed TDM measures, as detailed on page 4-47 of the Original DEIR.

- Promote "least polluting" ways to connect people and goods to their destinations.

The Specific Plan includes several objectives to support "least polluting" ways to facilitate mobility, as described on page 2-14 of the Original DEIR. TDM measures

described on pages 4-46 through 4-48 will encourage people to travel within and to/from the Project Area using more sustainable modes.

- Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments.

The incorporation of bicycle lanes is one of the primary mobility enhancements associated with the Specific Plan. Bicycle facilities that are proposed are illustrated in Figure 4-7 on page 4-29 of the Original DEIR.

- Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.

Bicycle parking will be required for all developments within the Specific Plan area, as detailed on page 2-18 of the Original DEIR.

- Ensure that the project enhances, and does not disrupt or create barriers to, non-motorized transportation.

Projects will be required to provide improvements to pedestrian and bicycle connectivity. For example, maximum block lengths would be set within the Specific Plan area, to encourage a more extensive and convenient circulation system for pedestrians and cyclists.

- Connect parks and open space through shared pedestrian/bike paths and trails to encourage walking and bicycling. Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points. Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles.

Pedestrian and bicycle connectivity would be significantly improved throughout the Specific Plan area, benefiting walk and bike access to open space, schools, parks, and other destinations. The Specific Plan does not have jurisdiction over the vehicle fleet and operations of schools located within the Specific Plan area.

- Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.

Flexible work hours are included in the TDM measures for the Project, as detailed on page 4-47 of the Original DEIR. The Plan can encourage but not require flexible work hours.

- Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions. Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles. Purchase, or create incentives for purchasing, low or zero-emission vehicles.

A transportation information center is included in the TDM measures for the Project, as detailed on page 4-47 of the Original DEIR. As detailed on page 2-18 of the Original DEIR, all projects that provide parking shall be required to provide electric vehicle charging stations for a minimum of 5% of total vehicle parking spaces.

- Create a ride sharing program. Promote existing ride sharing programs e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides.

A ride sharing program is included in the TDM measures for the Project, as detailed on page 4-47 of the Original DEIR.

- Create or accommodate car sharing programs, e.g., provide parking spaces for car share vehicles at convenient locations accessible by public transportation.

The project includes the requirement of the provision of one shared-vehicle parking space for every 25 residential units, and one shared-vehicle parking space or one carpool space for every 25,000 square feet of nonresidential uses, as detailed on page 2-18 of the Original DEIR.

- Provide a vanpool for employees.

Vanpool programs are included in the Ridesharing TDM measure detailed on page 4-47 of the Original DEIR.

- Create local “light vehicle” networks, such as neighborhood electric vehicle systems.

As detailed on page 2-18 of the Original DEIR, all projects that provide parking shall be required to provide electric vehicle charging stations for a minimum of 5% of total vehicle parking spaces. In addition, neighborhood electric vehicles will be able to use the roadway system in the specific plan area.

- Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.

The Original DEIR includes idling time limits for construction vehicles on page 11-23 of the Original DEIR.

- Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.

The project includes the requirement of the provision of one shared-vehicle parking space for every 25 residential units, and one shared-vehicle parking space or one carpool space for every 25,000 square feet of nonresidential uses, as detailed on page 2-18 of the Original DEIR. Also detailed on page 2-18 of the Original DEIR, all projects that provide parking shall be required to provide electric vehicle charging stations for a minimum of 5% of total vehicle parking spaces. This would provide the infrastructure need to support local electric vehicles.

As described in response to each measure, the Proposed Alternative encompasses the full list of actions required by the California Attorney General to reduce greenhouse gas emissions. In addition, the comment fails to show how the total balance of mitigation measures found in the Attorney General's Office publication are necessary in order to reduce GHG impacts to below the level of significance. CEQA does not require, and in fact restricts lead agencies from applying mitigation measures where a nexus is not clearly demonstrated and the measures are not shown to be rationally proportional to reduce the impacts to below the level of significance. The comment fails to provide facts, or evidence based on facts that either of the two legal tests mentioned are satisfied here in order to compel inclusion of the balance of mitigation measures referenced in these documents.

27-69 The comment suggests some additional SCAQMD measures that should also be included and if not incorporated asks that the FEIR explain why they are infeasible. The transportation measures mentioned in the comment include providing bicycle lockers and paths, preferred parking spaces and bus turnouts to encourage alternative modes of transportation. The project includes requirements for bicycle parking for all new development, as detailed on page 4-47, bicycle lanes on many of the roadways within the Project Area and bicycle paths along the Los Angeles River and the Arroyo Seco as illustrated in Figure 4-7 on page 4-29 of the Original DEIR and preferred parking as detailed on page 4-47 of the Original DEIR. Typically bus operators prefer to avoid bus turnouts because traffic congestion on roadways can sometimes block buses from pulling back into traffic. Therefore, no additional mitigation measures are required because the measures mentioned in the comment are already contained in the Original DEIR (with the exception of the bus turnout measure, which is counterproductive to bus operations as described above).

The other non-transportation suggested mitigation measures are included in the lists described above and are already included in the Plan.

27-70 The comment that no meaningful review is possible as a result of deficiencies of improper baseline and omission of GHG projections noted. See Response to Comment 27-50 for discussion of baseline data, Response to Comment 27-51 for discussions of quantified GHG projection of the Proposed Alternative, and Response to Comment 27-61, 27-62, 27-66, 27-67, 27-68 and 27-69 for description of mitigation measures.

27-71 The comment suggests that the DEIR should institute additional mitigations described in the LEED-ND rating system. The comment does not provide any specifics as to the desired mitigations and what environmental impacts the mitigations would be intended to reduce or ameliorate. The Proposed Alternative includes many LEED-ND features and has already received LEED-ND Certification.

27-72 The comment letter cites legal precedence suggesting that an existing baseline is the appropriate baseline to evaluate the potential for project-related traffic impacts. It states that the Original DEIR did not follow this approach, instead comparing the potential for project impacts against a future baseline. The comment continues, "Thus, the DEIR compares the Project's impacts only against conditions that are predicted to occur more

than two decades after Project approval, a comparison wholly rejected by the court in Sunnyvale....The analysis presents a warped and incomplete picture of the Project's actual traffic impacts, because readers have no understanding of the actual impact of an influx of more than 27,000 new residents and millions of square feet of residential, commercial, and light industrial uses to the Project area. By failing to present the existing conditions as compared to existing-plus-Project conditions, the DEIR never demonstrates the actual additive traffic impact that the Project will have... The DEIR must provide, in understandable form, the comparison of existing conditions to those that will occur with the Project. To do anything else —results in illusory comparisons that can only mislead the public as to the reality of the impacts and subvert full consideration of the actual environmental impacts. (CBE v. South Coast, supra, 48 Cal. 4th at 322). Moreover, the DEIR's failure to use a correct baseline precluded consideration of mitigation measures that will ensure more effective use of alternative modes of transportation.”

The comparison of Existing plus Project conditions to Existing Conditions, consistent with the *Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council* (the Sunnyvale ruling), was conducted in the supporting traffic analysis in the Original DEIR. The level of service analysis and impact assessment table is included at the end of Appendix 4B (Technical Calculations). An Appendix 4E, which was completed and referenced in the Original DEIR, but mistakenly not included in the on-line version of the DEIR, included the existing plus project analysis, as well as text and table documentation equivalent to the Original DEIR Chapter 4.

Portions of the Transportation Chapter were revised and recirculated in the RP-DEIR on May 31 to July 16, 2012 to include the evaluation of Existing (2009) Plus Proposed Alternatives Conditions, consistent with the Sunnyvale ruling. The Existing plus Project analysis was provided for informational purposes only because it does not represent a realistic assessment of the Project's potential for impacts. Existing development can and will likely occur in the Project Area whether or not the Proposed Alternative is adopted because the Project Area is not fully built-out to the level of development allowed by existing zoning designations. This level of growth would be driven by natural market forces, though it would be capped at the maximum development potential allowed by existing zoning designations. The Cumulative plus Project analysis detailed in Chapter 4 of the Original DEIR applies growth associated with the Project to the baseline estimates of the natural growth associated with market forces forecast for the Project Area. Under the Existing plus Project scenario, the Project was grown to full build-out of the Proposed Alternative. Thus, the natural growth that can occur by right in the Project Area even without the adoption of the Proposed Alternative is attributed to the Proposed Alternative in the analysis of Existing plus Project, an unreasonable analysis given that growth can and will occur in the Project Area without the adoption of the Proposed Alternative. Thus, the Cumulative plus Project scenario assigns significance to the impacts identified in the traffic study that informed the Original DEIR analysis, whereas the impacts identified under the Existing plus Project scenario are provided for informational purposes only.

Subsequent to the Sunnyvale ruling, the Second Appellate District Court of Appeal of the State of California (Second District Court) issued a ruling in *Neighbors for Smart Rail v.*

Exposition Metro Line Construction Authority, affirming the use of Cumulative plus Project analysis scenarios to determination the significance of Project traffic impacts in EIRs. The Court found that in proper cases, use of projected conditions may be an appropriate way to measure project related impacts on traffic. The Second District Court’s ruling found that evaluating a project in relation to the existing traffic conditions whose implementation date is well into the future will “yield no practical information to decision makers or the public.” As the build of the Proposed Alternative is projected to 2035 only increases the relevance of establishing a future cumulate growth baseline and the impracticality of comparing the Proposed Alternative related traffic to existing traffic conditions.

27-73 See response to Comment 27-72.

27-74 See response to Comment 27-72.

27-75 The comment suggests that the Original DEIR fails to disclose that the neighborhood’s current population has a 40 percent alternative mode share of non-private vehicle commuters.

Most data show that commute to work trips typically make up only about 25% of total daily trips, and work trips tend to show the highest transit usage. Therefore, the percent of daily Project Area non-vehicle trips are likely to be less than they are for commute trips. Therefore, the existing mode split associated with trips made by existing residents of the Project Area is not expected to materially change after implementation of the Proposed Alternative. Pages 4-46 through 4-48 of the Original DEIR detail the transportation demand management (TDM) strategies that have been proposed to reduce vehicular trips and encourage use of transit, walking, and biking. The goal of the TDM measures would be to ensure that future residents of the Project Area use transit, walk, and bike, at the same level or greater than the existing Project Area population. A part of the TDM strategy includes the requirement of employers to subsidize transit passes for employees. In response to the comments and review of research findings, the TDM strategies in Mitigation Measure Transportation 1 has been revised to include required participation of new residential uses of over 50 units to participate in a discounted transit pass program. Another TDM strategy in Mitigation Measure Transportation 1 also requires all new projects to unbundle the cost of parking from the cost of living by either by charging a rent or lease fee, or selling the parking space separately.

The Proposed Alternative also includes parking maximum requirements of no more than one space per dwelling unit for all new residential uses, and no more than one space for every 1,000 square feet for non-residential uses. The Proposed Alternative also incentivizes the establishment of car share programs by requiring new projects, that include parking, to dedicate one shared vehicle parking off-street space for every 25 units and/or 25,000 square feet, and by awarding car share vehicles priority access to on-street parking spaces. See Corrections and Additions to changes to Mitigation Measure Transportation 1.

The transit-oriented development proposed for the Proposed Alternative coupled with complimentary TDM strategies detailed in the Original DEIR that would provide a series of incentives and improvements to transportation facilities and services would ensure that the transportation performance of the Project Area, as represented by mode split would be similar to that of the existing population of the Project Area. As the Proposed project incorporates all the recommendations of the Policy Toolkit for Equitable Transit-Rich Neighborhoods designed to attract transit participation from higher income residents, new residents would be expected to have similar transit ridership as the existing population in the Project Area.

Additionally, the Proposed Alternative has been revised to increase affordable housing incentives devised to encourage the development of housing supply to moderate, low and very-low income families. See Section 5 of the FEIR for a description of the revisions (Revised Proposed Alternative)

See MR 1 Displacement and response to comment 27-20 on the incentives for affordable housing in the Proposed Alternative.

27-76 The comment states that the Original DEIR fails to disclose that the Proposed Alternative will displace low-income households and renters and attract higher income residents who will use their vehicles and will be less inclined to use transit as compared to the current population. See MR 1 Displacement and response to comments 27-20 on the incentives for affordable housing in the Proposed Alternative, and 27-75 above on existing and future transit utilization.

27-77 See MR 1 Displacement.

27-78 The comment reiterates the findings of the Minager Report which noted technical deficiencies in the Original DEIR's Transportation Chapter. To correct certain technical deficiencies portions of the Transportation Chapter were recirculated from May 31 to July 16, 2012.

27-79 The comment notes the peer review of the transportation analysis conducted by Minagar & Associates, Inc. identified inconsistencies in lane geometries at 11 study intersections that differ from on-the-ground conditions identified in the Minagar report in November, 2011.

See response to Comment 27a-4.

27-80 The comment notes that peak hour factors at 13 unsignalized intersections should be revised to reflect actual peak hour conditions.

See response to Comment 27a-5.

27-81 The comment states that "the Transportation Chapter did not adequately analyze: 1) the project's potential traffic impact on affected CMP facilities, i.e. potential regional

impacts of Project traffic on the surrounding freeway system serving the Project area.” Or 2) potential project impacts to the transit system.”

See responses to Comments 27a-10 and 27a-12.

- 27-82 The comment states that “With respect to the CMP facilities, neither the Original DEIR nor the supporting appendices has described the LOS conditions under with-Project conditions for four of the five relevant freeway segments.”

See response to Comment 27a-10.

- 27-83 The comment states that “With respect to transit, the Original DEIR provides only a vague description of transit-related requirements for future Project-area developments. However, the Minagar Report concludes that based on land use decisions that the CASP has already made, more detailed and extensive transit demand forecasts and mitigation could be established.”

See response to Comment 27a-12.

- 27-84 The comment states that “The Maximum Parking Spaces projected with the Site Area Parking Cap (Table 4.5) is also confusing. (DEIR, p. 4-21). The table and caption appear to read that the actual number of permitted maximum parking spaces is significantly larger in the Proposed Alternative than what is standard under ITE Parking Generation 4th Edition, since more than 1,100 additional parking spaces are permitted, Project-area wide, beyond what is standard in guidance documents. Thus, contrary to the stated intentions of the Proposed Alternative, this Parking Cap would allow an excessive amount of private vehicle parking spaces, which would encourage low-occupancy vehicles to travel to and within the Project Area.”

The comment provides no facts to substantiate its claim that the Proposed Alternative exceeds ITE Parking Rates. Where in fact the Proposed Alternative establishes maximum parking rates lower than existing parking rates both elsewhere in the City as well as compared to the ITE Parking Rates. Even with the additional 1,100 permitted spaces the resulting total amount of parking would be less than current parking requirements.

- 27-85 The comment states that “the computer travel demand model used for the transportation analysis is not available. (Minagar Report, p. 1). It is unclear whether the analysis relied on dynamic traffic modeling software (like Synchro or VISSIM) for the analysis.”

See response to Comment 27a-2.

The analysis software and methodologies used are detailed on page 4-6 of the Original DEIR. Consistent with LADOT requirements, the City’s CalcaDB intersection analysis software was used to analyze signalize intersections using the CMA methodology. Traffix software was used to analyze unsignalized intersection in accordance with the Highway Capacity Manual methodologies for two-way and all-way stop-controlled intersections. Synchro and VISSIM are detailed traffic operations and simulation

software programs used for tasks such as signal optimization and coordination. The project is a long range Specific Plan, and so no details in terms of signal operation and design in the future are known. Therefore, the traffic analysis in the Original DEIR appropriately uses intersection capacity analysis to determine the potential for Project-related impacts consistent with the methodologies required by the City.

- 27- 86 The comment states that “For its VMT analysis in Section 4.2.2.3, the Original DEIR has telescoped out to a regional scale to illustrate that although the Project will create a 7 percent increase in VMT in the Project area, on a regional scale, the Project will lead to a 0.26 percent reduction in VMT. (DEIR, pp. 4-50 to 4-51). However, as discussed in the Minagar Report, there is absolutely no data provided to support this conclusion. (Minagar Report, p. 21). The Original DEIR references a 2010 study not included in the Original DEIR or within any other available resource. This conclusion must be supported by evidence in the record, and we reiterate the Minagar Report’s recommendation that a revised DEIR include technical reports showing: 1) How in/out project-related trips were estimated, including geographic and network factors, socioeconomic modeling parameters, modal splits and trip generation estimates and assumptions employed in the transportation demand model (TDM); and 2) A detailed summary of results and speed and VMT distributions for Los Angeles County, including those results reported in Tables 4-8 and 4-9 of the Original DEIR.”

See response to comment 27a-14.

- 27-87 The comment states that “Tables 4-8 and 4-9 (DEIR, p. 4-51), are referenced inaccurately in the subsequent text and appear to be misleading.”

The text referenced by the comment incorrectly refers to Table 4-7 and Table 4-8. The text should reference Table 4-8 and Table 4-9. The Original DEIR will be revised to make this correction. Aside from incorrect table numbers, the text and the tables are accurate and consistent with each other.

- 27-88/89 The comment notes that the VMT analysis contained in the Transportation Chapter evaluates the Proposed Alternative’s VMT against 2035 baseline conditions. The comment goes on to state, “This comparison also appears to be an improper use of the — “ratio” theory, which posits that a contribution to existing, degraded conditions cannot be significant... This seems to be an attempt to minimize the significant impacts disclosed in Table 4-8, which show that the Proposed Alternative would create a 6.8 percent higher VMT than the No Project scenario.”

The Project is expected to generate additional VMT within the Project Area because there would be an increase in vehicular trips associated with the growth in population and jobs within the Project Area. However, as indicated in Table 4-9 on page 4-51 of the Original DEIR, the Proposed Alternative will reduce regional VMT because it will improve the jobs/housing balance within the Project Area, as well as in Northeast Los Angeles. Thus, the comment is inaccurate in asserting that the Proposed Alternative will increase VMT. See Response to Comment 27-142 regarding application of a ‘ratio theory’.

27-90 The comment states “The Original DEIR fails to analyze any traffic-related safety implications from increased vehicular, transit, pedestrian, and bicycle traffic, in addition to increased pass-through traffic, in the Project area arising out of the six-fold population increase from the Project... The Project will also generate significant and unavoidable levels of congestion in at least nine separate intersections, as well as a significant rise in Project-related vehicles mile travelled, adding to traffic and transportation hazards....The Original DEIR fails to take into account how safety will be managed, thereby failing to discuss the —health and safety problems caused by the physical changes.”

See response to comment 22-2a.

27-91a The comment states, “The Original DEIR’s failure in assessing traffic safety is especially troublesome since several of the study area intersections that will experience significant and unavoidable impacts due to the Project are near schools and other facilities frequented by children on foot or bicycle, and the increased vehicle traffic would create unsafe walking and biking routes for students walking or biking from local neighborhoods.” The comment goes on to list schools located near study intersections, and lists the forecast LOS for those particular study intersections, noting particular concern for pedestrian and bicycle safety near schools, and in low income areas, where, the comment suggests, collisions involving pedestrians and bicyclists occur more frequently.

See response to comment 22-2a.

27-91b The comment states, “With an increased population, an increase in school-aged pedestrian and bicycle traffic, significant congestion at several key intersections, and an additional 600,000 Project-Related Miles Travelled (see DEIR, Table 4-8) caused by the Project, the Original DEIR must analyze the impact of the Project-related traffic increases. The Original DEIR must determine whether these increases pose a safety hazard to pedestrians and it must provide mitigation for the likely increase in hazards.”

The Original DEIR analyzes the potential of Project-related traffic increases in Chapter 4 of the Original DEIR, consistent with the City’s requirements pursuant to the Department of Transportation (LADOT) Traffic Study Policies and Procedures. See response to comment 22-2a regarding pedestrian safety.

27-92 The comment states, “With respect to pedestrian and bicyclist safety around schools, we propose the following mitigation proposals: preparation of a “Pedestrian Routes to School Map”, installation of appropriate traffic controls, school warning and speed limit signs, school crosswalks, and pavement markings.

See response to comment 22-2a.

27-93 The comment states, “The Original DEIR simply concludes that the Project will not have a significant impact on emergency access since ‘Emergency Service Providers would continue to have the same access and egress as currently exist’ (See DEIR at 4-50). The analysis fails to account for the significant roadway congestion at major intersections

resulting from the Project, the significant increase in Project-related VMT, and significant increases in non-vehicle modes of transportation which will add to overall street congestion, clearly impacting emergency service providers.”

California Vehicle Code requires that all motorists stop to allow emergency vehicles to pass. Because emergency vehicles can travel on the wrong side of the road as needed to bypass congestion, degradation in intersection LOS would not materially affect access and response times for emergency vehicles. Emergency vehicles are typically equipped with a transponder that can extend green time so that emergency vehicles can travel through intersections without experiencing delay and congestion associated with red lights. Thus, it can be concluded that degradation in intersection LOS associated with the Project would not have a significant impact on emergency access, as concluded in the Original DEIR.

- 27-94 The comment states, “The Transportation Analysis Never Discusses Construction-Related Traffic... As with other impacts, this impact could be severe due to the cumulative impact of dozens of Project-area construction projects being undertaken simultaneously. At a minimum, the Original DEIR should have identified this potential impact, and provided for meaningful mitigation, such as a requirement that individual projects create construction traffic management plans and that construction workers be provided with incentives to take transit to work sites.”

The precise phasing of development within the Specific Plan cannot be known since it will depend on market conditions; therefore, any evaluation of the level of construction traffic generated at any given time would be purely speculative. However, the level of traffic generated by the construction of any development projects within the Project Area would be much lower than the traffic generated by the full build out of the Specific Plan. Therefore, any construction traffic would generate the same or fewer transportation impacts than were identified in the Original DEIR. Because construction traffic is temporary in nature, the City of Los Angeles considers construction traffic impacts potentially adverse, but not significant. Any development projects within the Project Area will need to follow the standard City approval process to obtain building permits.

- 27-95 The comment states, “The Transportation Analysis Uses LOS Metrics that Are Inconsistent with the City’s Transportation Policies,” citing objectives and policies in the City’s General Plan and Bicycle Plan, that “protect and enhance non-vehicular travel.” The comment concurs with the conclusion in the Original DEIR that identified intersection mitigation measures would be infeasible because right-of-way is not available for roadway widenings. The comment notes that if MMLOS analysis were conducted, mitigation measures, such as enhancements to “transit, sidewalks, intersection crossings, bikeways and additional enhancements to other travel modes” could be feasibly implemented. The comment continues “This goals and policies already adopted by the City cannot be realized if its sole focus is on relieving traffic congestion. The LOS measurement can cause policy makers to lose sight of this greater vision.” It goes on to encourage the city to apply Multi-Modal Level of Service (MMLOS) to analyze the potential impacts of the Proposed Alternative.

The study was conducted in accordance with the adopted analysis methodologies and impact criteria as required by the City of Los Angeles. The City of Los Angeles has initiated a study to evaluate MMLOS. At the time of the preparation of the Original DEIR, no MMLOS methodologies have been adopted by the City for the analysis of transportation impacts in environmental documents.

However, the Project proposes numerous improvements to protect and enhance non-vehicular travel, as detailed in Chapters 2 and 4 of the Original DEIR consistent with the outcome of the MMLOS –based methodology.

- 27-96 In reference to mitigation measures, the comment states “Transportation Demand Management (“TDM”) strategies depend on programmatic solutions like ridesharing services, transit pass subsidies, guaranteed ride home programs, flexible work hours and a commuter club. Because there is no actual enforcement mechanism in the mitigation measure, there is no guarantee that any of these programs will be implemented or monitored. As discussed further below, mitigation measures must be feasible and “fully enforceable through permit conditions, agreements, or other measures” (Pub. Res. Code §21081.6(b); see also Guidelines §15126.4(a)(2)). The vagueness and open-endedness of this mitigation measure undermines its good intentions... commercial developers should be required to make up-front commitments in the form of physical improvements and impact fees that fund physical improvements or ongoing programs”

See TDM Response to Comment 27-75.

- 27-97 The comment states, “Further, cycling to and within the CASP area would be further encouraged if bicycle parking amenities were also provided at a significant proportion of public parking spaces created as part of the Proposed Alternative. As proposed, residential and commercial parking standards focus on residents and employees, but customers and visitors to the area would be encouraged to bicycle if, e.g., 10 percent of all public parking spaces must be set aside for bicycle parking. Bicycle parking should be secure and protected from the elements to create an extra incentive for cyclists.”

As detailed on page 2-18 of the Original DEIR, bicycle parking spaces are required to be provided in every non-residential use within the Specific Plan area, at the ratio of one bicycle space or locker for every 2,500 square feet of non-residential use. This bicycle parking could be used by employees as well as customers and visitors. In open space areas, as detailed on page 2-18 of the Original DEIR, two bicycle parking spaces would be required to be provided for every 15,000 square feet of open space or park area, which would be available to visitors to the area.

- 27-98 The comment alleges that the Original DEIR fails to set out “substantial evidence and meaningful analysis” of the impacts on the future environment of the Project Area related to hazardous materials and wastes and fails to identify meaningful and enforceable mitigation measures to reduce potential impacts to future occupants and visitors. In response the evaluation of impacts has been revised and mitigation measures have been added. New Figures produced showing location of key hazardous sites and oil and gas well locations. Text has been amended where appropriate to reflect inclusion of Figures

and convey those areas of significance to reader. New Figures 10-1 to 10-8 are provided along with the revised text in the Corrections and Additions section of this FEIR.

- 27-99 The comment raises concerns that the Original DEIR did not adequately address the potential impacts of the Proposed Alternative as a result of redevelopment in the small northern most portion of the Project Area that overlaps with the Pollock Well Field. The comment references other sections of the Original DEIR that indicate perched groundwater conditions or where subterranean building levels extend into the groundwater table, stating that the Original DEIR is inconclusive as to the risks posed by the contaminated Well Field.

The analysis of the potential impacts of developing within the Pollock Well Field Area has been revised in this FEIR and is included in the Corrections and Additions section. A summary of the revised analysis is included as follows.

The figure on Page 5 of the EPA San Fernando Valley Superfund Sites 2003 Update (2003 Update) delineates more accurately that both PCE and TCE contamination within Area 4 that exceed the Maximum Concentration Level (MCL) as of 2001 are in an area that do not coincide with the Project Area boundaries.¹⁹ Figure 10-1 in the Original DEIR has been revised and relabeled Figure 10-2 (see Corrections and Additions) to incorporate information from the 2003 Update. The 2003 Update also states that groundwater areas outside the areas that are delineated may have some contamination, but the most recent data from those wells are below the detection limit of 2 µg/L. Furthermore, the Property Inventory Study prepared by Ninyo & Moore included in Appendix 10A in the Original DEIR concluded that the limits of the impacted groundwater are approximately 3,000 feet northwest (upgradient) of the Project Area.²⁰

Therefore, as the Project Area falls outside of the Pollock Well Field Superfund Site, the Project Area would have less than significant impacts due to exposure of groundwater contamination associated with the Pollock Well Field Superfund Site as a result of redevelopment in the Project Area. Text has been revised in the Hazardous Materials Chapter. Figure 10-1 has been revised and renumbered to 10-2 to show more accurately the extent of Pollock Well Field in relation to site. Revised Figure and text revisions are provided in the Corrections and Additions.

- 27-100 The comment states that the Original DEIR did not provide graphics showing the location of the 3 additional EPA Superfund, 2 additional Cortese list, 18 additional sites with histories of contamination, corrective action, or other hazardous waste issues, 49 registered oil and gas wells and three dozen underground or above ground storage tanks within the Project Area. Figure 10-1 has been added and replaces 10-1 in the Original DEIR (which is now Figure 10-2, Pollock Well Field, see Response to Comment 27-99)

¹⁹ Ibid.

²⁰ Based on the 2009 US EPA “San Fernando Valley Superfund Sites Groundwater Monitoring Program Report” (US EPA 2009)

that shows the CERCLA sites within the Project Area. Figure 10-3 has been added to the EIR that shows the location of the two additional Cortese List sites. Figures 10-4 through 10-7 have been added to this FEIR that shows open and closed Cleanup Sites, Voluntary Cleanup Sites, oil and gas wells, and leaking (open and closed) and permitted Underground Storage Tanks (USTs) respectfully. The text has also been amended that updates the list of identified sites with contamination history and provides more clarity on the location of existing hazardous sites in relation to residential areas. See Corrections and Additions.

The comment also states that the Original DEIR makes no effort to describe the locations or status of the forty-nine oil and gas wells in the Project Area and that the EIR should disclose the risks as a result of future development and identify measures to reduce such risks. Location of Oil and Gas Wells - a review of the DOMMS database indicates only 3 abandoned wells within site, with a fourth on the immediate western boundary of the site. As stated above, the FEIR adds Figure 10-6, which identifies the locations of the oil and gas wells. The FEIR also revises text of the analysis to reflect further details on the status of the wells (i.e. plugged etc), and adds Mitigation Measure Hazardous Materials 10 to address potential impacts to development in areas with abandoned oil and gas wells. See the Correction and Additions.

27-101 The comment states that the Original DEIR does not disclose the impacts related to dangerous gases including methane, and contains no enforceable mitigation, and no facts to support the conclusion that impacts will be less than significant. Hazardous Gases - Comment noted and in response the text in section 10.3.2.1 has been revised and Mitigation Measures Hazardous Materials 8 has been added to reduce potential impacts. Upon implementation of the mitigation measure, impacts as a result of dangerous gases will be less than significant. See Corrections and Additions.

27-102 The comment states that the measures identified in the Original DEIR with respect to potential hazards posed by properties on the Cortese List are vague and unenforceable. The comment is noted, and in response, Mitigation Measure Hazardous Materials 4 has been revised to require follow up verification and remediation if necessary for all potentially contaminated properties on any of the lists identified in this section. All subsequent remediation needs to be substantiated by the relevant regulatory agency prior to issuance of building permit. See Corrections and Additions.

27-103 The comment states that the Original DEIR failed to specify compliance measures or standards for hazardous waste impacted sites within ¼ mile of schools. Comment is noted. Figure 10-8 has been added showing location of schools with ¼ mile buffer zones plotted around each school site. In addition, text has been revised to section 10.3.2.1 to indicate the amount of the project Area that would be within ¼ mile of a school. It is assumed that implementation of Mitigation Measures Hazardous Materials 3 will require that all hazardous materials and wastes are managed in compliance with City of Los Angeles, State and federal requirements. All compliance actions devised to remediate existing hazardous properties as referenced in Mitigation Measures Hazardous Materials 4, 8, 9, and 10 would also apply with the ¼ mile buffer area of an existing school. There, impacts would be less than significant. See Corrections and Additions.

27-104 The comment states that the Original DEIR does not address secondary impacts as a result of implementation of mitigation measures as a result of remediation efforts, however, the comment does not provide facts, or evidence based on facts that such activities would result in a significant impact. The excavation, handling, and transport of impacted soil and other hazardous material shall be handled in accordance with compliance to Office of Safety and Health Administration (OSHA) regulations. Comment will be forwarded to the decision maker.

27-105 The comment states that the Original DEIR does not address cumulative impacts as a result of remediating several properties in the Project Area at the same time, however, the comment does not provide facts, or evidence based on facts that such simultaneous remediation activities would result in a cumulative significant impact. In addition, each future project would be required to comply with the requirements of the relevant regulatory agency and Mitigation Measure Hazardous Materials 4 with regard to specific site remediation.

27-106 The comment expresses concern that the Original DEIR fails to identify and analyze impacts to viewsheds, nighttime lighting and glare, and shadows. Existing lighting conditions for exterior buildings, security lighting, exterior surface parking lots, street lights and traffic are noted in the Original DEIR on page 5-22, section 5.3.1. Assumptions note conformance with City environmental goals and objectives related to solar access, shade, and exterior illumination (pages 5-17 and 5-22). All exterior light is to be integrated with building design to avoid casting light on adjacent properties or sensitive habitat (Original DEIR, page 5-17).

Potential impacts from shadows generated by new building are addressed in the Original DEIR on page 9-22. Buildings are to be designed so that no more than three hours of shadow will be generated on parks, open space or abutting rooftop areas between 10 a.m. and 2 p.m. on December 21. Figure 5-17 in Section 4 Corrections and Additions shows projected modeled hours of shade for December 21.

The Original DEIR also notes that new development would be designed not to cast shadows on a historic resource as defined by CEQA section 1506§.5(a).

27-107 See response 27-106. The Original DEIR notes that parks, open spaces, and abutting roof tops will be directly available to the sun for a minimum of 3 hours on December 21 or approximately 33 percent of the time.

27-108 See response 27-106.

27-109 The comment expresses concern about viewshed and shadow impacts from any new construction along Broadway, north of the State Park, to the Solano Canyon area. Figure 5-17 in Section 4 Corrections and Additions illustrates proposed shadow conditions generated by the proposed alternative.

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- 27-110 The development of the CASP project will occur to the east of the Los Angeles State Historic Park. The downtown skyline is to the southwest of the CASP area and Elysian Park and the Broadway Bridge are to the north and west. Views looking out from the park towards the locations noted in the comment will not be affected by development of the proposed Specific Plan.
- 27-111 The commenter's concerns about the impact of noise on the health of humans is noted.
- 27-112 The commenter's concerns that the noise monitor locations, selected for the EIR, are not located within the existing residential zones and that the existing conditions data indicates that existing noise levels are already higher than is typically acceptable in a residential community, is noted. The noise monitor locations were selected based upon their proximity to known noise contributors such as freeways, roadways, and rail corridors so as to capture the most severe noise levels present today.
- 27-113 The commenter suggests that the EIR identifies erroneously that development and operation of the Project will not significantly change the existing degraded noise conditions and the EIR fails to quantify potential noise impacts under the Proposed Alternative. In fact, future noise levels emitted by future traffic capacity and the change in future noise levels compared to a 2035 No Project Alternative were calculated and the results illustrated on Table 12-11 on page 12-22, Table 12-12 on page 12-23, and Figure 12-3 on page 12-24. As can be seen in Table 12-12 the differential between the Future 2035 No Project Alternative and Future 2035 with the Proposed Alternative ranges from 0-2 dBL with one dBL reflecting the predominant change. Information directing the reader from 12.3.2.1 to the aforementioned tables and figure will be added in the corrections and omissions section of this document.
- 27-114 The commenter suggests that the mitigation measures proposed in the Original DEIR fails to mitigate noise impacts to the existing sensitive receptors. The existing uses are already subject to noise from the local roads, freeway and nearby rail corridors.
- 27-115 The commenter indicates that the Original DEIR provides no indication as to how the interior noise thresholds can be achieved. How the interior noise levels are actually achieved is up to the designer of each project. Regardless of their design and/or engineering solution the project must meet the defined thresholds.
- 27-116 The comment states that the Original DEIR failed to show how construction noise could impact sensitive receptors, and to evaluate if Mitigation Measure Noise and Vibration 2 is adequate by permitting the use of jackhammers, drills, and impact wrenches between the hours of 7.a.m and 9 p.m. Due to the degree of uncertainty attributed to the programmatic nature of the document, the portion of the Original DEIR related to construction noise impacts has been revised and recirculated in the RP-DEIR on May 31st, 2012 to disclose that noise and vibration impacts related to future construction activities would be considered significant and unavoidable. Mitigation Measure Noise and Vibration 2 was revised in the RP-DEIR to limit activities that generate high noise levels to 6 P.M. See Section 2.C of the RP-DEIR for the revised construction noise analysis.

27-117 The comment states that the Original DEIR acknowledges that noise in the Project Area will increase due to increase in vehicle traffic, new industrial uses and population but does not include additional measures to address noise increases, and provides an administrative clearance process by which applications can proceed without consideration of mitigation. However, Mitigation Measure Noise and Vibration 1 was included to mitigate potential operational impacts of future development. As part of the mitigation, Mitigation Measure Noise and Vibration 1 requires submission of acoustical analysis for certain types of sensitive uses proposed in the Project Area and includes performance standards for uses proposed in noise impacted areas. Additionally the comment provides no facts, reasonable assumption based on facts, or expert opinion supported by facts that Mitigation Measure Noise and Vibration 1 would not be sufficient to address cumulative noise impact. However, the comment is noted and will be forwarded to the decision maker.

The comment also states that combined impacts of construction noise could have a cumulative significant impact that was not addressed in the Original DEIR. Due to the degree of uncertainty attributed to the programmatic nature of the document, the portion of the Original DEIR related to construction noise impacts has been revised and recirculated in the RP-DEIR on May 31st, 2012 to disclose that noise and vibration impacts related to future construction activities would be considered significant and unavoidable. See Section 2.C of the RP-DEIR for the revised construction noise analysis.

27-118 The comment states that construction noise mitigation in the Original DEIR should have included noise monitoring to allow for compliance monitoring and time of day restrictions. In addition the comment states that the noise sensitive uses should be provided with City telephone numbers to report noise violations, along with construction schedule, and the information be posted in Spanish and Chinese. Mitigation Measure Noise and Vibration 2 has been revised to incorporate requested information. See Corrections and Additions.

27-119 Comment incorporates comments made by the Los Angeles Conservancy. See comments 20-1 to 20-4.

27-120 The commenter's concerns regarding the vagueness of the mitigation language in regards the protection of a bird species has been noted and the following language will be included in the Corrections and Additions section as well as in the Mitigation Monitoring Plan.

- b. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities until August 31; or,
- c. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located the qualified biological monitor shall develop a mitigation plan that includes a buffer appropriate to the specific species of bird as well as the type and degree of disturbance expected at the construction site. The mitigation plan and identified buffer shall remain in place until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting.

The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

27-121 The comment suggests that the Original DEIR fails to properly analyze the Proposed Alternative's impacts on public services and recreational facilities but provides not additional analyses, facts, or findings that supplement and/or contradict the analyses and conclusions of the Original DEIR. The comment is noted for the record.

27-122a The comment suggests that the Original DEIR fails to adequately determine whether the projected population increase will result in the need for new or physically altered police or fire facilities. Upgraded information systems have expanded the ability of City departments to assess service and infrastructure needs, as well as track the provision of services and infrastructure. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents and call frequencies, the Los Angeles Fire Department (LAFD) can shift resources to meet local demands for fire protection, as needed. In addition, LAFD has reviewed the Plan and DEIR and has concluded that that the project will increase the need for fire protection and emergency medical services in this area and adequate off-site public and on-site private fire hydrants may be required. LAFD has also concluded that based upon the number of existing stations within close proximity to the area that fire protection would be adequate. All projects would be required to obtain clearance from LAFD and meet the Firefighting Personnel Access and Firefighting Apparatus Access requirements set forth in the LAFD comment letter of November 9, 2011 and further detailed in the Mitigation Monitoring Plan. Any additional fire hydrants would be identified by LAFD on a project by project basis.

27-122b The comment highlights the fact that LAFD operates a maintenance supply facility within the Project Alternative area and suggests that the Original DEIR has failed to consider the impact on both the project and the City should this facility be moved outside of the project area. The assumption that the facility might move outside of the area at any point in the future is both remote and speculative. The new mixed-use districts, proposed by the Project Alternative, will continue to permit the maintenance facility on the location where it is currently located. The facility would also be permitted on any other parcel within the Project Alternative that is designated as one of the mixed-use districts Urban Village, Urban Innovation, or Urban Center.

27-122c The comment reiterates the Original DEIR's conclusion that the increased population into the Project Area could increase demand on police protection and fire and emergency medical services in terms of staffing, operational, and maintenance costs but also suggests that the Original DEIR neglected to discuss whether, and to what extent, the population increase would alter demand for public services and whether the expected level of available service could accommodate the change in demand. As regards the concern about fire and emergency medical services please see response to comment 27-122-a above. The police department relies on a computer model called Patrol Plan, which considers 25 different variables, such as forecast call rate and average service time. Utilizing this Plan to target personnel where and when they are most needed LAPD has succeeded in reducing crime nine years in a row.

27-123 The comment notes that discussion on future school facilities is insufficient. The Original DEIR notes that K-12 investment for public schools is the responsibility of the State and LA USD (page 14-20). The Original DEIR also notes that the development of school facilities in the Project Area would be subject to approval by the City of Los Angeles and the LA USD. The proposed development of a new project would be subject to school impact fees created to mitigate impacts on school facilities based on the provisions of Senate Bill 50 (SB 50).

27-124 The comment questions the Original DEIR's assertion that mixed-use development may decrease the student population. While the Original DEIR is correct in stating that mixed-use developments do typically generate less student population than single-family homes the statement is erroneously placed here as the mixed-use developments are not replacing single-family homes but are replacing non-residential uses. The sentence about decreased student population rates will be struck from page 14-21 Mitigation measure 1. See Corrections and Additions.

27-125 Comment noted. See MR 1 on Displacement.

27-126 The long-range park acreage standard indicated by the PRP is a minimum of 4 acres per 1,000 persons, divided between Neighborhood and Community Recreational Sites.²¹ The Neighborhood (2 acres/1,000) sites are defined as parks within one mile and the community sites are those within a two mile distance (2 acres/1000). Based upon this metric, the Project Area, as described in Table 14-5 on page 14-10 of the EIR has a total of 814.80 acres of parks within two miles. Eighty-eight percent, or 716 of these acres are within one mile of the Project Area. Assuming a future total (existing + new) population of 31,855 residents a total of 26 acres are available per 1,000 persons and if the future employment figures of 10,546 are added to the residents there are a total of 20 acres per 1,000 persons. And this is before any additional new parks, with the exception of the Los Angeles State Historic Park, are calculated in. It does not include the new 1.2 acre park that was recently opened at the Confluence, the proposed 6 acre Albion Dairy Park that will complete in the next few years, nor any additional parks that could result from the Bonus FAR or publicly accessible open space incentive programs that are defined in the Plan.

In response to the comment about the lack of clarity in regards to the 101.68 acres of Potential Future Open Space + Existing Parks Surrounding CASP areas referenced on page 14 of the November 1, 2010 Draft Plan-Appendix A-01 the acreage represented a hypothetical total build-out of park space that could result in the future within the Proposed Alternative should many future public improvements come to fruition. The table was included for references purposes only and has been removed from the August 6, 2012 Draft Plan. As noted in the comment the Lincoln Heights Jail site and the Midway Yards may not ever be developed and thus they were not included in Table 14-6 of the Original DEIR. The Los Angeles State Historic Park (LASHP) was included and while only 11 acres have been developed to date the State is currently on track to

²¹ *Public Recreation Plan – Section 1, pg. 3*

complete the build out of the full 32 acres in the next few years. While the LASHP will not include dedicated facilities for organized sports activities such as soccer, baseball, or basketball the park will include recreational paths for jogging, walking, and bicycling as well as grassy areas that will lend themselves to impromptu play activities such as throwing and catching balls and Frisbees.

27-127 The commenter's suggestion that a mechanism for eliciting community input about future park improvements be included in the Plan and that the requirement that 90% of park area be landscaped has been noted and revised language has been incorporated into the May 2012 Draft Plan and will be forwarded to the decision makers.

27-128 The commenter suggests that the Original DEIR failed to adequately analyze the Project's potential impacts on existing heavily-used recreational facilities. It is the responsibility of the City's Recreation and Parks Department (RAP) to identify the budgetary, facility, and programming needs to meet the recreational and parks demands of the general public. To assist with this effort RAP completed in 2008 a Parks Needs Assessment that analyzed the quality, maintenance needs, and utilization of each of the City's parks. As the population within the Project Area expands, as a result of the Plan, the increased tax benefits resulting from the increased growth will provide additional funding to the City's general fund which will further enable RAP to maintain and improve the area's parks.

27-129 The commenter suggests that it is necessary to compare the anticipated demand for recreation and park services to the expected level of service available. As described in 27-126 above the Project Area is well served by a large number of parks. Residents and employees of the Project Area will not be limited to utilize only the park facilities that are located within the area but will have access to over 800 acres of parks that are within two miles of the plan. The majority of these parks include multiple recreational facilities. There are currently six baseball diamonds, 10 basketball courts, a football field, eight indoor gymnasiums, three handball courts, two swimming pools, one soccer field, five tennis court areas, and two volleyball courts not including the new facilities at the Rio de Los Angeles State Park.

27-130 The commenter suggests that the Original DEIR fails to meet existing park improvement and maintenance objectives identified in the Central City North Community Plan. See comment 27-128 above.

27-130 The comment alleges that the Proposed Alternative overlooks park and open space objectives outlined in the Central City North Community Plan (Objective 4-1: "To conserve, maintain and better utilize existing recreation and park facilities which promote the recreational needs of the community;" Objective 5-2: "To ensure the accessibility, security and safety of parks by their users, particularly families with children and senior citizens"), but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts in support of its position. See Responses 27-126 and 27-131 for discussions of park space and access in the Proposed Alternative area.

27-131 The commenter suggests that the Original DEIR did not analyze the impact of traffic on residents' ability to access the Los Angeles State Historic Park (Park). In fact, the Original DEIR and the Plan propose a number of safety features to enable residents, employees, and visitors alike to access the Park. Future street improvements for Spring Street include traffic signals at Wilhards, Mesnager, Sotell and Ann Street (see DEIR page 4-49). In addition, roadway improvements are planned to include bicycle lanes in each direction, a wide sidewalk and street trees on the south side of Spring Street, a landscaped median, and crosswalks. These amenities are illustrated on pages 10-3 and A-04-36 of the November 2010 Draft. Map 18.3 in the May 2012 Draft Plan further illustrates these improvements.

27-132 The commenter suggests that the Original DEIR's analysis of the impact of the Project Alternative on the City's library services is inadequate. The four libraries located in proximity to the Plan area are all at capacity and the Department of Library Services has been interested in adding a library in the vicinity of the Project area for some time now. As redevelopment occurs in the area and the need for additional library services intensifies the resulting increased tax revenues will expand the feasibility for the City to raise a library bond for new library construction.

27-133 The comment provides information about four principles that guide water supply analysis and restates the role that the Original DEIR may serve for future development projects but provides no additional analyses, facts or findings that supplement and/or contradict the analyses and conclusions of the Original DEIR. The comment is noted for the record.

27-134 The comment suggests that the City, as the lead agency, needs to make an independent decision that the projected water supplies will be sufficient to meet the demands of the project. In considering the additional conservation steps and long range strategies that the Department of Water and Power has taken and pursued since the 2005 Urban Water Management Plan we conclude that the WSA is accurate when it concludes that there will be sufficient water to supply the future growth in the Project Alternative area.

Water use in the City is currently approximately equal to the water use in the City 20 years ago despite an increase in population of over 750,000 persons during this period.[1] This stability in water use is mostly attributed to the City's public education campaigns and water conservation programs over the past 15 years. In addition to conformance with SB 610 and SB 221, the LADWP has instituted its own City level water conservation measures, which include:

- "Water Closet, Urinal and Showerhead Regulations" (LAMC Sections 122.00–122.10) – Reduces water consumption by requiring new buildings to include water conservation fixtures (such as ultra-low flush toilets, urinals, taps, and showerheads) and plumbing fixtures that reduce water loss from leakage in order to obtain City building permits.
- "The Emergency Water Conservation Plan of the City of Los Angeles" (LAMC Sections 121.00-121.13) – Provides for the implementation of a citywide phased water conservation program to respond to dry weather periods based on the LADWP's

evaluation of the projected supply and demand of City water supplies. The phased conservation program provides for mandatory water conservation measures at the user level and customer use curtailment of normal water usage.

- LADWP is also continuing its water recycling efforts to reduce further the demand on imported water. Currently, almost 64,000 acre-feet per year (AFY) of the City's wastewater is recycled. Approximately 1,950 AFY of recycled water is used for municipal and industrial purposes; 28,000 AFY of recycled water is used for environmental enhancement and recreation in the Sepulveda Basin; and approximately 34,000 AFY of recycled water is sold to the MWD, which then provides further treatment to meet demands within its service area.[2]

[1] City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan, Page ES-3.

[2] City of Los Angeles, Department of Water and Power, 2005 Urban Water Management Plan, page ES-8.

27-135- The comment asks for clarification on the projected population numbers and the total water demand. At the time that the WSA was compiled there were plans underway for an additional 368 units to be built within the Plan area and this number was then added to the existing 1448 units to arrive at a base of 1,861 units and a total build out of 8,776. The WSA looks not only at the additional demand generated by increased growth but at the cumulative demand needed for the total 8,776 units and found that there existed sufficient water supply to meet this growth. The discrepancy in the million gallons per day between the Water Supply Assessment (WSA) and the DEIR has been corrected. See Section 4 Corrections and Additions.

27-136 The comment expresses concern that DWP's deferment of water conservation efforts (May 17, 2010 DWP Board Meeting) would impact the Plan's ability to meet its water utilization rates. The Plan imposes water conservation standards that would be required of all Projects regardless of whether DPW enacts similar standards for the City at large.

27-137- The comment questions the solid waste numbers and in particular questions how the increase in population, resulting from the Plan, would not create a greater waste stream. The comment assumes only the increase in residential population and does not take into account the existing industrial waste. The projected waste stream is comparable to other similar communities.

27-138 The comment provides information on the use of cumulative impact analysis. The comment is noted.

27-139 The comment notes that the Original DEIR is not clear in respect to whether there are or are not significant cumulative impacts to transportation, or noise and vibrations. To

clarify this issue the applicable sections of the Original DEIR were recirculated from May 31 to July 16, 2012. Please see Chapter 4 Corrections and Additions.

27-140 See Comment 27-139 above.

27-141 See Comment 27-139 above.

27-142 The comment states, “The Original DEIR employs the ‘ratio theory’ within its greenhouse gas impacts and transportation impacts analyses, as discussed above, despite the fact that courts have soundly rejected it.”

See response to comment 27-60 in regard to the response to applying a “ratio theory” to the GHG analysis. The comment is not clear how a “ratio theory” was applied to the transportation analysis. However, Section 17.2.4 describes the traffic study methodology. The analysis included an evaluation of local intersection impacts using the standard Level of service (LOS) methodology in addition to evaluating the changes to vehicle mile travelled (VMT) as a result of the Proposed Alternative. The LOS analysis compared the project related traffic impacts for the proposed Alternative in the 2035 build-out year and compared the impacts to the cumulative traffic conditions projected for 2035 (Cumulative 2035 Conditions). The Project Plus Cumulative 2035 Conditions analysis determined that the Proposed Alternative would result in a significant and unavoidable impact to 9 intersections. Contrary to the comment, a “ratio theory” was not applied to the cumulative impact traffic evaluation.

The VMT analysis is used to understand the change in regional travel patterns based on land use decisions. This is normally the missing analytic framework in traditional traffic study guidelines based on the LOS methodology, though it is critical in understanding the regional travel patterns’ response to land use decisions. This emerging analytic framework is pursuant to recent state legislation such as SB 375 and other state policies devised to respond to the threat of climate change. It should be noted that there is currently no threshold to determine when a project related VMT constitutes an impact. The Original DEIR cumulative transportation analysis is therefore consistent with the CEQA Guidelines and emerging policies responding to climate change and does not apply a “ratio theory”.

See response to comment 27-60 in regard to the response to applying a “ratio theory” to the GHG analysis. See Response to Comment 27-72 on the traffic impacts methodology for cumulative impacts of using the 2035 baseline.

27-143 See Comment 27-139 above.

27-144 The comment states, “The misapplication of the traffic and transportation baseline—the comparison of projected 2035 conditions with the Project to a 2035 No Project scenario rather than a comparison to existing conditions—is repeated here in the cumulative impacts analysis... As discussed above, this analysis does not explain how 2035 with-Project conditions relate to existing conditions, in clear violation of CEQA.”

See response to comment 27-72.

27-145 The comment claims that the Original DEIR does not follow guidelines described in the City of Los Angeles CEQA Thresholds Guide, particularly in relation to cumulative projects and their impact to population. The comment highlights Table 17-1 (p. 17-3), which lists “related projects” (i.e. nearby projects, whose individual impacts combine with those of the Proposed Alternative to produce cumulative impacts), and takes issue with the absence of population figures listed therein.

As explained in Original DEIR Section 17.2.2,

CEQA Guidelines (section 15130) recommend using either a "list" or "projection" approach to identify these projects. The list approach requires the identification of all... projects that could contribute to a significant cumulative environmental impact. A projection approach requires a review of related planning documents that describe regional conditions related to the cumulative impact. This EIR uses a combination of these approaches. (p. 17-2)

The cumulative impacts of Population, Housing, and Employment are analyzed using the “projection” approach. In the same section, the Original DEIR further explains,

Section 15130(b) of the Guidelines indicates that the level of detail of the cumulative analysis need not be as great as for the project impact analyses, that it should reflect the severity of the impacts and their likelihood of occurrence, and that it should be focused, practical, and reasonable. (p. 17-1)

See Response 27-31 for a discussion of the significance of population and housing impacts due to infill development, and its role in offsetting growth elsewhere in the region.

27-146 The comment expresses concern that the Original DEIR has not adequately analyzed the potential cumulative impacts given that the projects listed in Table 17-1 do not correspond to the area of concern for the different impacted resource categories citing Section 15130(b) of the CEQA Guidelines. As stated on page 17-2 of the Original DEIR, the cumulative impact analysis applied both a list approach and a projection approach in the cumulative evaluation. A projection based approach was undertaken with the analysis of impacts that are either more regional in nature, or would likely occur outside of the Project Area such as the following: transportation impacts (see discussion of Cumulative 2035 Conditions in Section 17.2.4 of the Original DEIR), and water supply impacts (See discussion on Water Demand Forecast in the Original DEIR Appendix 7B Water Supply Assessment). For certain impact areas, the cumulative impact methodology is already captured in the threshold such as greenhouse gas impacts (see Section 2.B of the RP-DEIR) and regional air quality - criteria air pollutant emissions.

However, for impacts that are more localized in nature, a list-based approach is more appropriate. The projects included in Table 17-1 were identified to determine if local projects could, in confluence with the Proposed Alternative, contribute to a significant impact. The projects that were identified were small in scale and would be constructed in a relatively short time frame, and therefore not shown to contribute to a potentially

significant impact identified in the Original DEIR analysis. Because implementation of the Proposed Alternative occurs over a relatively large area, and is long-term in nature, it is more practical to use a projection-based approach when evaluating most of the cumulative impacts. For certain localized impacts, the project level of analysis would suffice for a cumulative impact analysis, such as aesthetic impacts, as most of the Project Area would not be impacted by projects outside of the Project Area.

27-147 The comment states that the cumulative project list in the Original DEIR was under inclusive. It notes in particular that “the Original DEIR should also include the Cleantech Corridor, High Speed Rail, Spring Street Bridge widening, USC University Park Specific Plan and surrounding development, and the Los Angeles County/USC, Medical Center.”

The travel demand model developed to analyze the potential for Project impacts includes trips for the specific cumulative projects identified in the Original DEIR, as well as forecast growth associated with specific plans and regional population and employment growth.

Thus, the trips generated around the Project Area are accounted for in the forecast growth contained in the travel demand model. The model developed for the Proposed Alternative is based on the SCAG 2008 RTP model, the most recently available model at the time of the issuance of the Notice of Preparation (NOP). The RTP includes reasonably foreseeable transportation improvement projects in the future year model run, which includes High Speed Rail and the Spring Street Bridge project.

27-148 Comment requests a specific geographic scope that correlates with the cumulative impact analysis. The difference between a list-based approach and a projection based approach as applied to a geographic scope of analysis, is discussed above in Response to Comment 27-146. The comment offers no facts, or evidence based on facts that a cumulative impact exists that was not disclosed in the Original DEIR. See Response to Comment 27-146.

27-149 The comment states that the cumulative analysis in Chapter 17 of the Original DEIR makes no reference to the list of projects in Table 17-1. The projects included in Table 17-1 were identified to determine if local projects could, in confluence with the Proposed Alternative, contribute to a significant impact. The cumulative analysis found that the projects that were identified were small in scale and would be constructed in a relatively short time frame, and therefore not shown to contribute to a potentially significant impact identified in the Original DEIR analysis. The comment offers no facts, or evidence based on facts that a cumulative impact exists that was not disclosed in the Original DEIR. See Response to Comment 27-146.

27-150 The comment reiterates demographic data from the Original DEIR and suggests that the Original DEIR has not adequately described how the existing population will not be burdened by the environmental impacts of the Proposed Alternative.

The comment cites studies that convey the high estimated cancer risk in the Project Area and other relevant demographic statistics that indicate the existing Project Area residents may share a disproportionate burden of environmental health hazards. The City

acknowledges the concerns, and to address this impact, has revised the health risk due to TAC sources and included it in the RP-DEIR on May 31st, 2012. Existing TAC sources, such as the I-5 and SR-110 freeways, and the Los Angeles Transportation Center (LATC) rail yard were included in the analysis. See section 2.A.1 of the RP-DEIR for a discussion of increased health risk in the Project Area due to the Proposed Alternative. No other related projects were identified that were seen to increase health risks to residents in the Project Area in addition to the Proposed Alternative.

27-151 The comment suggests that the Original DEIR needs to analyze not only the future impacts but also analyze the additive impacts of the Proposed Alternative to the existing sources of air pollution and the disproportionate impacts on the Project Area population. The City acknowledges the concerns and has revised the health risk due to TAC sources in the RP-DEIR on May 31st, 2012 to address this impact. See section 2.A.1 of the RP-DEIR for a discussion of increased health risk in the Project Area due to the Proposed Alternative.

27-152 The comment suggests that the DEIR should be revised and recirculated to include a “Community-Oriented Development Overlay” (COD) Alternative devised to increase affordable housing production and preservation by including a “super density bonus”, establishing a lower 1.5:1 base FAR, and creating a parking incentive. The comment presents the purpose of the proposed COD Alternative to reduce the VMT and GHG citing research of the high transit usage of lower-income residents. The comment further states that the proposed COD Alternative will substantially lessen the significant and unavoidable transportation impacts of the Proposed Alternative as well as impacts that the Original DEIR failed to identify such as housing displacement.

CEQA Guidelines Section 15126.6 states that the purpose behind the selection of project alternatives is to avoid or substantially lessen significant effects of the project. However, the comment fails to demonstrate that the COD Alternative would avoid or substantially lessen significant and unavoidable impacts that are not already addressed by the Proposed Alternative.

The comment states that the Proposed Project would result in a significant and unavoidable impact of GHG emissions but does not provide evidence that GHG impacts are significant under the Proposed Alternative. In contrast, the GHG analysis was revised and recirculated in the RP-DEIR and shown to be less than significant with the incorporation of mitigation measures. See Section 2.B of the RP-DEIR.

In several other comments, the comment alleges the Proposed Alternative will result in a displacement impact, though the response included in MR-1 Housing Displacement demonstrates that the Proposed Alternative will not have an impact on housing displacement. The comment presents that a main basis for the recommendation of the COD Alternative is to ensure that future populations in the Project Area would have high transit ridership thereby reducing VMT and related traffic and GHG impacts. However, transportation and housing related measures are already in place as part of the Proposed Alternative that, along with mitigation measures would foster high transit usage in the Project Area and address the potential impacts described in the comment to the maximum

extant feasible. See MR-1 Housing Displacement, Response to Comment 27-75 on Proposed Alternative VMT.

In addition, to further encourage residential projects to include units that are affordable to extremely low, very-low, and/or low-income households the Project Alternative has been revised to include a Density Bonus Option for both Publicly Funded and Not Publicly Funded projects. The Density Bonus Option provides additional floor area to projects that voluntarily include restricted affordable units and provides projects the opportunity to utilize On or Off-Menu Incentives that may further assist a project to include affordable units. As the inclusion of the Density Bonus Option would incentivize the production of affordable units, the Project Alternative would not result in the disproportionate production of market rate units in the Project Area. See Section 5 of the FEIR for a description of the revisions (Revised Proposed Alternative)

Furthermore, Section 15126.6 (a) and (c) of the CEQA Guidelines also state that an EIR is not required to consider alternatives that are considered infeasible. The practical result of the COD would be to discourage redevelopment in the Project Area as the development restrictions suggested by the COD would deter developers, property owners, and lending institutions from investing in the area and therefore would not meaningfully achieve many of the purposes of the Project Alternative (See Section 1.1 of the CASP in Appendix A5 of this FEIR). There are two components of the COD which would particularly deter future investment in the project area; affordable housing, commercial and industrial development quotas and severe parking limitations.

The COD's affordable housing quota seeks to establish a target of 50% market rate and 50% affordable housing units. Under the COD development permits for industrial and commercial square footage would also be constrained unless a minimum and maximum number of building permits (square footage of commercial/industrial or housing units) had been met. The COD does not define what the minimum or maximum square footage or housing unit limits would be. Within the 50% affordable units that the COD seeks to achieve, 21-22% of the units would be expected to be set-aside for extremely low-income households, another 21-22% for very low-income households, 27% for low-income households, and 30% for moderate income households. A strategy that relies on achieving such tightly defined limits, before additional development can proceed, would impose not only a logistical accounting burden on the City but confound the development and investment community to such an extent that they would most certainly pursue opportunities elsewhere in the region before attempting to develop in the Project Area.

Likewise, the COD's requirement that parking, for residential units, in the Project Alternative be limited to zero unless a project includes a certain percentage of affordable housing units would, today, render most market rate projects infeasible. The current lending environment would, most likely, look unfavorably on a market rate residential project that could not include any parking for its residents. And while a market rate project could include affordable units, in order to avail itself of some parking and the COD's density bonus allotment, the COD does not provide any evidence to demonstrate how a developer could financially afford to include the percentage of affordable units that the COD would require in exchange for the density bonus.

Due to the constraints imposed by the COD on future developments the City concludes that the COD would be infeasible and therefore it is not required to consider it as a viable alternative.

See MR-1, and Responses to Comments 27-20, 27-22, and 27-25 related to displacement and changes in VMT as a result of the Proposed Alternative.

27-153 The comment outlines CEQA requirements with respect to project descriptions. The comment is noted.

27-154 The comment finds the project description inadequate. The comment states the total acres of the project are missing from the Project Description Chapter and claims that the actual growth and development envisioned by the Proposed Alternative is not clear. The size of the Proposed Alternative is approximately 660 acres as indicated in the second paragraph of S.1 of the Executive Summary and further delineated in Tables 3.1, 3.2, and 3.4 of Chapter 4. Section 2.2.1.1 has been modified in Section 4 Corrections and Additions to include information about future growth.

27-155 The comment notes that the Project Description does not specify the geographic distribution of land uses in the Proposed Alternative, beyond outlining the Proposed Alternative's land use districts and giving approximations of overall square footage for each use. However, the commenters provide no evidence to suggest that flexibility in land use will result in an impact to the physical environment.

The distinction between land use districts is outlined in detail on pp. 33 through 37 of the Draft CASP (See Appendix A5). While the three urban districts allow many of the same uses, the proportions of allowable office, retail, and residential space vary significantly, as specified in the Limits Table on p. 37.

27-156 The comment claims that the land use districts presented in the Proposed Alternative are unspecific, but does not provide any evidence to suggest that flexibility in land use will result in an impact to the physical environment. Furthermore, as discussed in Response 27-12, the performance standards set forth in Section 8 of the Proposed Alternative mandate minimum distances between sensitive land uses (e.g. K-12 schools and residential) and industrial projects, as recommended by the California Air Resources Board. See Response 27-155 for a discussion of specific land use regulations within each of the Proposed Alternative's land use districts.

27-157 The comment ascertains that the Original DEIR fails to provide sufficient information as to the future FAR of the Plan area. The Original DEIR analyzes the potential growth that would result from the Plan. The Plan describes in detail the various FAR strategies that can be applied to increase a by-right FAR beyond the permitted 3.0 FAR. For clarification purposes there is no per unit density limit in the Plan area. The FAR is used to govern the permitted building envelope.

27-158a. The comment states that the water demand indicated by the WSA is 2.75 and yet the Original DEIR indicates a water demand of 6.3. This discrepancy was in error and clarified in Section 4 Corrections and Additions.

27-158b. The comment states that “the Transportation chapter relies on intersection geometries that misrepresent actual conditions on the ground.” See response to comment 27a-4.

27-159 The comment questions the statement that decreased student population rates could result from new mixed-use development. This statement was erroneously placed and contradicts other statements earlier in Chapter 14 which concludes that the Plan will add new households and student population in the area. The sentence will be struck from page 14-21. Please see Section 4 Corrections and Additions.

27-160a The comment states that the use of purple and green in Figures 4-2,4-5, and 4-6 is difficult to distinguish when printed in black and white. The electronically published DEIR (PDF format), and all hard copies of the Original DEIR were printed in color to ensure legible graphics.

27-160-Chp. 2-Project Description Section 2.2.1.2. The comment asks for clarity on the reference to historic neighborhoods. The description is referring to the Lincoln Heights and Chinatown neighborhoods.

27-160-Chp. 2-Project Description Figure 2-3. The comment states the map is illegible in black and white. The electronically published DEIR (PDF format), and all hard copies of the Original DEIR were printed in color to ensure legible graphics.

27-160-Chp. 3-Land use

Figures 3-1,3-7, 3-8. The comments express concern that the maps are hard to discern in black and white. The electronically published DEIR (PDF format), and all hard copies of the Original DEIR were printed in color to ensure legible graphics.

Tables 3-1 and 3-2. The comment notes that the total acreage in Tables 3-1 and 3-2 both total 660 but add up to 661 and 659 respectively. The acreage for each category was rounded and thus there is a slight discrepancy between the totals. The corresponding rows add up accurately (once the 213 is corrected to 233- see next response). The comment also notes that the total of Table 3-1 is 213 but the rows total up to 233. The total will be corrected. See Section 4 Corrections and Additions.

Figure 3-13. The comment states the map is illegible in black and white. The electronically published DEIR (PDF format), and all hard copies of the Original DEIR were printed in color to ensure legible graphics.

Section 3.3.1. The comment asserts that the explanation in the first bullet regarding the authority of the Specific Plan is difficult to understand. The comment also questions how the urban and streetscape design elements referred to in bullet three will serve to enhance the connections between the communities. The comment does not present any new

information that indicates that the land use analysis is inaccurate and that additional clarification would render an alternative outcome.

27-160-Chp. 4-Transportation

Figures 4-2,4-5, 4-6. The comment questions the use of color to differentiate between the types of roadways. The electronically published DEIR (PDF format), and all hard copies of the Original DEIR were printed in color to ensure legible graphics.

Figure 4-6. The comment inquires what is meant by a “4-Lane Roadway with Reduced Auto Capacity” as indicated for Spring Street from Main Street to Broadway in Figure 4-6. The reduction in auto capacity is a result of lane narrowing to accommodate wider sidewalks and on-street bike lanes on Spring Street. This information was included in the traffic study but not included in the Original DEIR and has now been clarified in Section 4 Corrections and Additions.

Table 4-8. The comment questions how the projected increases in population could result in a negligible increase of VMT. See response to comment 27-38.

27-160-Chp. 6-The comment notes a missing soil definition from Figure 6-1. Figure 6-1 has been revised, See section 4 Corrections and Additions. The comment also seeks more information on the specific soil types presented in order to assess potential impacts. Section 6.2 Standards of Significance describes the criteria for determining significant impacts associated with earth resources which includes but is not limited to these soil-related items:

Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the alternatives and potentially result in on- or offsite landslide, settlement, or collapse

Be located on expansive soil creating substantial risks to life or property

Section 6.3 Potential Earth Resources Impacts analyses the potential geologic impacts of the Proposed Alternative on the Project Area.

27-160-Chp. 7-The comment indicates an overall dissatisfaction with the quality of figure 7-1 and wonders if there is undisclosed significance to the term “reach.” A reach is a length of water between two selected points. There is no significance to the designation, it is there for reference. The comment also states that designating the location of the Project Area on figures 7-1, 7-2 and 7-3 would be helpful. The maps in question show large areas, necessary to illustrate a watershed and its drainage area, and are intended to provide a broad context, not illustrate discrete features directly significant to the Proposed Alternative. The general location of the project area in the figures can be inferred from other provided maps so new maps will not be produced.

27-160-Chp. 8-The comment questions the significance of the 300ft buffer mentioned in Mitigation Measure Biological Resources 1. That mitigation measure has been revised, see section 4 Comments and Corrections.

27-160-Chp. 9-The comment seeks clarification of section 9.1.5.8. As mentioned in the DEIR the results of the Historical Resources Survey which contains all the requested information is found in Appendix 9B.

27-160-Chp. 10-The comment complains that tables 10-2, 10-3, and 10-4 do not provide enough information with which to assess possible impacts. It also states “Representing this data in a table obscures the prominence of these 458 sites over the relatively small project area.” The figure of 458 does not indicate “sites.” As explained on page 10-4 the figure 458 indicates records found where “use of hazardous materials or generation of hazardous wastes has been recorded in the Project Area.” The databases searched are shown in table 10-1 and the numbers in table 10-2 show the number of records found within each database. These records are attached to addresses in Tables 10-3 and 10-4 which show sites with a record of hazardous waste generation and of location of storage tanks, respectively. Sections of Chapter 10 have been revised or added to include maps showing the areas with potentially significant hazardous waste impacts. See Section 4 Corrections and Additions.

27-160-Chp. 11- The comment identifies an inconsistency in the EIR, noting that in the introduction, section 1.2.4, two schools are identified in the Project Area yet Figure 11-1 depicts five schools. The text in section 1.2.4 refers only to the two LAUSD elementary schools while the additional schools reflected in Figure 11-1 include private schools in the area. The legend in Figure 11-1 has been corrected in Section 4, Corrections and Additions to reflect this. The comment also suggests section 11.2.2 is “difficult to interpret” because the California State particulate matter standard is not detailed but provides no additional analyses, facts, or findings to support the suggestion and/or contradict the analyses and conclusions of the Original DEIR.

27-160-Chp. 14- The comment seeks clarification on information regarding the Los Angeles Fire Department in section 14.1.2. See section 4 Corrections and Additions.

27-160-Chp. 16- The comment suggests that, without detailed explanation of the effects of carbon dioxide, it is difficult to understand GHG impacts as other gases are compared to it. The effect GHGs have on the atmosphere is explained on page 16-1, section 16.1.2.1, Climate Change Background. As explained on page 16-3 “The GWP of each gas is measured relative to carbon dioxide...for example, sulfur hexafluoride is 23,900 times more harmful at contributing towards global warming than carbon dioxide.”

27-161 The comment identifies an inconsistency in the EIR, noting that the text in Chapter 14, Public Services, states that only two schools are in the Project Area yet Figure 12-1 depicts five schools. The text in Chapter 14, Section 14.1.4.1 refers only to the two LAUSD elementary schools while the additional schools reflected in Figure 12-1 include private schools in the area. The legend in Figure 12-1 has been corrected in Section 4, Corrections and Additions to reflect this.

27-162 The comment describes CEQA’s requirements with respect to mitigation measures. The comment is noted.

27-163 The comment expresses concern that many of the mitigations are vague or unenforceable. Many of the mitigations have been revised in the Corrections and Additions sections and described in greater detail in the Mitigation and Monitoring Plan.

27-164 The comment expresses concern that the implementation of some mitigations are deferred. Many of the mitigations have been revised in the Corrections and Additions sections and described in greater detail in the Mitigation and Monitoring Plan. See Appendix A1 of this FEIR.

27a. Minagar & Associates, Inc., November 22, 2011

27a-1 The comment states, “The findings of this peer review reveal that the consultant’s traffic analysis contains several inconsistencies and/or discrepancies which may understate or otherwise imprecisely report a clear estimation of the project’s potential impacts on the surrounding transportation system.”

The comment’s assertion that there are inconsistencies and/or discrepancies that understate or imprecisely report a clear estimation of the Project’s potential impact is evaluated and responded to in response to the commenter’s detailed comments. Based on the evaluation of the commenter’s detailed comments, as described in the responses to comments that follow, it was determined that the Original DEIR adequately reported the project’s potential impacts on the surrounding transportation system. Additional detail has been provided to respond to comments, as applicable, which will be incorporated into the FEIR.

27a-2 The comment states, “Due to the inaccessibility of the proprietor’s (City and Consultant) computer travel demand model, it is uncertain whether the Cornfield Arroyo Seco Specific Plan (CASP) & Redevelopment Plan, as proposed, might actually result in more, or fewer, significant or less than-significant transportation impacts than claimed in this September 2011 DEIR. It is therefore our recommendation that the Transportation Element of the Original DEIR be revised to reflect correction of the noted deficiencies and/or discrepancies within the Consultant’s traffic analysis before proceeding to the next stage of the environmental review.”

The request to obtain the computer travel demand model was not submitted to the Department of City Planning.

This comment conflicts with a comment later in the commenter’s letter that states, “The results of the traffic study are substantiated by supporting data of the consultant’s model runs and a comprehensive validation/calibration effort conducted in cooperation with LADOT, as documented in the attached Appendix.”

Appendix 4C of the Original DEIR provides the Model Validation Report detailing the developing of the travel demand forecasting (TDF) model used to assess the Proposed Alternative. As detailed in Appendix 4C, the model was developed based on the 2008 Regional Transportation Plan (RTP) TDF model of the Southern California Association

of Governments (SCAG). The CASP TDF model provided additional land use and roadway network detail to provide a more refined analysis of the potential impacts of the Proposed Alternative within the study area. The effectiveness of the model was validated against thresholds established in Travel Forecasting Guidelines (California Department of Transportation, November, 1992).

Additionally, dynamic validation tests were conducted to determine how the model would respond to changes in land use or the roadway network, as recommended in Model Validation and Reasonableness Checking Manual (Travel Model Improvement Program, FHWA, 1997). The dynamic validation tests showed the model responded adequately.

The static and dynamic validation tests were met or exceeded; and therefore, the model was determined to be a valid tool to assess the potential for impacts related to the CASP. The model and validation report were reviewed and accepted by LADOT.

- 27a-3 The comment states, “since the FEIR for the CASP has yet to be prepared and approved, current Year 2011 conditions prevail in the review of the remaining areas of the Original DEIR’s Transportation Element, such as traffic volumes, pedestrian activity, the current transit system, and existing intersection and roadway lane geometrics as of 2011.”

CEQA requires that the establishment of the base year for analysis be determined by the Notice of Preparation (NOP) and subsequent DEIR scoping meetings. The NOP was released in March 2009, therefore establishing the baseline for the transportation analysis and section of the Original DEIR.

- 27a-4 The comment states that there are inconsistencies in lane geometries in the traffic appendices compared with existing conditions for the following 11 intersections:

- Location #2.) North San Fernando Road and North Avenue 19
As noted in the comment, the lane configurations for this intersection were modified after counts were collected. Thus, the analysis of existing conditions reflects the lane configuration in place at the time of the data collection effort (2009), the base year for analysis purposes as detailed in Response 27a-3. The current (2011) lane configurations are included in all future scenarios. Therefore, the lane geometries for this intersection were appropriately analyzed, and no change is required.
- Location #5.) West Avenue 26 and SR 110 Southbound Off-Ramp
The comment correctly states that the westbound through movement is not allowed at this intersection. However, as noted in the comment, vehicles making a prohibited westbound through movement were observed during both peak hours (4 in AM, 7 in PM). The comment states that “under future conditions, it should be assumed that corrective measures are in place such that vehicles are not encouraged to continue straight through the intersection.” While vehicles in the field were observed making the move, the analysis has been revised to be consistent with the comment. The following details the changes to the analysis as a result of the adjustment of lane configurations to reflect the comment. In several cases, the changes do not affect the analysis results, because the

analysis results show the intersections would operate in oversaturated conditions (delay greater than 200 seconds) under some scenarios. Delay greater than 200 seconds is typically not reported. The changes to the analysis per the comment would not affect the level of service under any of the analyzed scenarios, and would not affect the overall conclusions of the Original DEIR. The revised lane configurations and analysis are included in Figure 4-3,4-5,4-8 (Partial), Tables 2.D-1, 4-3, and 4-5, and in the Lane Configurations (Partial) figure at the rear of Section 4 Corrections and Additions.

Int.	Existing Conditions			
	AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS
5	47	E	>200	F

Int	2035 Conditions No Project				2035 Conditions Plus Project			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
5	117.3	F	>200	F	55.2	F	>200	F

- Location #12.) North Avenue 19 and Humboldt Street

The comment refers to a driveway on the west leg of the intersection. The driveway is a partially fenced, dirt lot that does not function as an active leg of the intersection. When the baseline counts were collected, no vehicles were observed turning into or out of the fenced dirt lot, during either the AM or the PM peak period. Therefore, it would be inappropriate to analyze the lane configurations as described in the comment, and no change is required.
- Location #14.) North Avenue 18 and Pasadena Avenue

The westbound approach lane configurations have been updated to reflect this comment, to include a left-turn only lane, a through lane, and a through-right lane. A revised Lane Configurations figure and Tables 2.D-1, 4-3, and 4-5 are included at the rear of Section 4 Corrections and Additions. Cumulative No Project conditions analyzed the intersection in accordance with this lane configuration, so no revisions to the analysis were necessary. However, existing conditions have been revised to reflect this configuration. The results are detailed below.

The Cumulative plus Project lane configurations for the eastbound and westbound approach of Pasadena Avenue have been modified to include a left-turn only lane, and a through-right lane, reflecting the proposed narrowing of the roadway to include bike lanes, on-street parking, and wider sidewalks. Updated results are detailed below.

Int.	Existing Conditions				Cumulative plus Project Conditions			
	AM Peak Hour		AM Peak Hour		AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS
14	0.482	A	0.422	A	0.844	D	0.722	C

- Location #20.) North Avenue 18 and North Spring Street/North Broadway

The comment refers to the orientation of the left turn lane for the North Broadway approach traveling southeast. The orientation of the arrow within the appendices of the Original DEIR will be adjusted to reflect that the turn is a left onto North Broadway

(eastern leg of the intersection), rather than a hard left onto Avenue 18 (north leg of the intersection). Only the graphic needs to be revised, as the analysis is consistent with the lane configurations as described in the comment. The revised lane configurations are included in the Appendix 4A figure at the rear of Section 4 Corrections and Additions.

- Location #22.) Daly Street and North Broadway

The southbound approach was observed to operate as a *de facto* right turn lane in the field. However, to ensure a worst-case assessment of the potential for Project impacts, the analysis has been revised according to the recommendations of the comment, thereby assuming no *de facto* southbound right turn lane on Daly Street. The revised analysis results are detailed below. Due to the particular critical movement in the LOS calculations, the V/C ratios and corresponding LOS do not change in all cases with the revised lane configurations. The revised analysis does not affect the conclusions of the Original DEIR, that there would be no Project-related impacts at this intersection. The revised lane configurations and analysis are included in the Appendix 4A figure and Tables 2.D-1, 4-3, and 4-5 at the rear of Section 4 Corrections and Additions.

Int.	Existing Conditions			
	AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS
22	0.666	B	0.635	B

Int	2035 Conditions No Project				2035 Conditions Plus Project							
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	Delta	Impact	Delta	Impact
22	0.819	D	0.85	D	0.800	D	0.797	C	-0.019	NO	-0.013	NO

- Location #26.) North Alameda Street and West College Street

The northbound approach was observed to operate as a *de facto* right turn lane in the field. However, to ensure a worst-case assessment of the potential for Project impacts, the analysis has been revised according to the recommendations of the comment, thereby assuming no *de facto* northbound right turn lane on Alameda Street. The revised analysis results are detailed below. Due to the particular critical movement in the LOS calculations, the V/C ratios and corresponding LOS do not change in all cases with the revised lane configuration. The revised analysis does not affect the conclusions of the Original DEIR, that there would be no Project-related impacts at this intersection. The revised lane configurations and analysis are included in the Appendix 4A figure and Tables 2.D-1, 4-3, and 4-5 at the rear of Section 4 Corrections and Additions.

Int.	Existing Conditions			
	AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS
26	0.430	A	0.516	A

Int	2035 Conditions No Project				2035 Conditions Plus Project							
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	Delta	Impact	Delta	Impact
26	0.450	A	0.533	A	0.202	A	0.462	A	-0.248	NO	-0.071	NO

- Location #30.) South Avenue 21 and North Main Street

The lane configurations figure is incorrect. As the comment states, the northbound approach should be a shared left-right lane. The revised lane configurations are included in the Appendix 4A figure at the rear of Section 4 Corrections and Additions. The analysis reflects the proper assessment of the intersection as a northbound shared left-right lane; therefore, the traffic analysis does not need to be revised.

- Location #33.) North Alameda Street and North Main Street/Ord Street

At the time the counts were collected, the northbound intersection lane configurations included a through-right lane, as well as a right turn only lane. Southbound Alameda Street has peak hour parking restrictions in place 7:00 AM to 9:00 AM, and parking is allowed during the PM peak period. Therefore, the analysis of the lane configurations in the Original DEIR is correct for existing conditions during the PM peak hour. The analysis in the Original DEIR did not include the additional southbound lane during the AM peak hour due to peak period parking restrictions. Therefore, the analysis has been revised and is summarized below. The reconfigured northbound lane configurations have been applied to the analysis of all future scenarios. The revised analysis does not affect the conclusions of the Original DEIR, that there would be no Project-related impacts at this intersection. The revised lane configurations and analysis are included in the Appendix 4A figure and Tables 2.D-1, 4-3, and 4-5 at the rear of Section 4 Corrections and Additions. The results are summarized below.

Int.	Existing Conditions			
	AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS
33	15.3	C	12.6	B

Int	2035 Conditions No Project				2035 Conditions Plus Project			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
33	53.1	F	17.2	C	39.3	E	18.5	C

- Location #36.) Mission Road and Griffin Avenue/Zonal Avenue

The right lane on Mission Road the comment refers to is striped as a dedicated right turn lane, with arcing striping through the entire right turn lane. There is no striped receiving lane through the intersection on Mission Road, and there is a bus stop and on-street parking, which would prevent the lane from being used as a receiving lane. Therefore, the Original DEIR appropriately analyzed the lane referred to in the comment as a right-turn only lane rather than a through-right lane. Additionally, analyzing the lane as a through-right lane as suggested by the comment would assume more capacity for the intersection than is actually available, thereby skewing the LOS results to be better than the intersection actually operates. To maintain an accurate and conservative analysis, the Original DEIR accurately analyzed this lane as a right-turn only lane, and no change is required.

- Location #38.) State Street and Marengo Street

The westbound approach was observed to operate as a *de facto* right-turn lane in the field. However, to ensure a worst-case assessment of the potential for Project impacts, the analysis has been revised according to the recommendations of the comment, thereby

assuming no *de facto* westbound right turn lane on Marengo Street. The revised analysis results are detailed below. The revised analysis does not affect the conclusions of the Original DEIR, that there would be no Project-related impacts at this intersection. The revised lane configurations and analysis are included in the Appendix 4A figure and Tables 2.D-1, 4-3, and 4-5 at the rear of Section 4 Corrections and Additions. The Lane Configurations figure includes the graphical correction to indicate that the eastbound right turn only lane is a *de facto* right turn only lane, as detailed in the comment.

Int.	Existing Conditions			
	AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS
38	0.495	A	0.475	A

Int	2035 Conditions No Project				2035 Conditions Plus Project							
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	Delta	Impact	Delta	Impact
38	0.625	B	0.597	A	0.588	A	0.462	A	-0.037	NO	-0.135	NO

27a-5 The comment states that “applied peak hour factors (PHF) at each of the following unsignalized intersections should be revised from 1.00 to field-derived PHF values to account for potentially significant traffic demand fluctuations in the AM and PM peak hours observed and used in the Level of Service analyses:”

- Location #5.) West Avenue 26 and SR 110 Southbound Off-Ramp
- Location #7.) North San Fernando Road and SR 110 Northbound On-Ramp
- Location #8.) West Avenue 26 and I-5 Southbound On-Ramp
- Location #9.) West Avenue 26 and SR 110 Northbound On-Ramp
- Location #11.) West Avenue 26 and Humboldt Street
- Location #12.) North Avenue 19 and Humboldt Street
- Location #23.) Wilhardt Street and North Spring Street
- Location #24.) South Avenue 20 and Albion Street
- Location #27.) Wilhardt Street and North Main Street
- Location #28.) Albion Street and North Main Street
- Location #30.) South Avenue 21 and North Main Street
- Location #32.) North Main Street and West College Street
- Location #33.) North Alameda Street and North Main Street/Ord Street

The City of Los Angeles Department of Transportation traffic Study guidelines do not require the assessment of impacts at unsignalized intersections, thus the unsignalized intersection analysis included in the Original DEIR is for informational purposes only, as well as to inform the decision making process for determining which unsignalized intersections should be considered for signalization in the future. The unsignalized intersection analysis conducted for existing conditions used a PHF of 1.0. The future unsignalized intersection analysis used a PHF of 0.950, a rough average for the study area. The future unsignalized intersection LOS was one factor taken into account (along with importance for access within the Specific Plan area) in evaluating which

unsignalized intersections should be considered for signalization in the future. Thus, the use of an intersection specific PHF for the existing unsignalized intersection LOS analysis has no bearing on the evaluation and conclusions of the Original DEIR, and revisions to the analysis is unnecessary.

- 27a-6 The comment states that “Observations of the data summarized in Table 3 indicate that some of the turning movement counts were collected on intervals of insufficient length. The City of Los Angeles’ former March 2002 Traffic Impact Analysis (TIA) Policies and Procedures required that morning and afternoon counts be collected during the 7AM-9AM and 4PM-6PM peak periods; however, recently revised August 2011 TIA requirements call for this window to be expanded by one hour during each time-of-day (AM and PM), to 7AM-10AM and 3PM-6PM. Although it is recognized that the City’s new traffic count time frame collection requirements were not in effect at the time of the Original DEIR’s traffic study preparation, it is nonetheless advocated that the full four-hour time frames be reflected during at each location to ensure that vehicular peak hours are not occurring outside of the surveyed traffic count period, such as during the typical 3PM-4PM “rush hour” at locations in close proximity to grade schools.”

As the comment notes, the LADOT policy to require traffic studies to conduct six hour counts (three hours AM & three hours PM) was not incorporated into the *Traffic Studies Policies and Procedures* (LADOT, 2010) until late in 2010. As detailed in Response 27a-3, the policies and procedures that were adopted at the time of the 2009 NOP dictate the analysis that must be prepared in the EIR. Therefore, the City requirement for six hours of traffic counts does not apply to the CASP DEIR.

- 27a-7 The comment states that, “Turning movement count data collected prior to the Year 2007 should also have been disregarded and updated with new field data at the time of the traffic analysis.”

The counts collected prior to 2007, as referred to in the comment, were provided by LADOT, and were the best available traffic data for the particular intersections in question at the time the study was conducted. LADOT reviewed and concurred with the process to adjust older counts to reflect 2009 conditions.

However, an additional evaluation has been conducted to verify the appropriateness of the use of the older counts to accurately reflecting existing conditions for the Original DEIR base year of 2009. Count sources, including LADOT and public environmental documents, were reviewed to find comparison counts collected on non-holiday weeks, on a Tuesday, Wednesday, or Thursday while schools were in session. While counts were found from these sources at additional study intersections, only the verification counts at the study intersections below met these criteria.

As shown in the table, the existing volumes in the Original DEIR based on older counts are substantially higher than the 2009 or 2011 counts used for verification purposes, with the exception of the PM peak hour for Intersection 35 (Mission Road & Daly Street/Marengo Street). However, PM peak period volumes were within 4% of the Original DEIR volumes, well within the day to day fluctuation of traffic found on most

city streets. Based on the evaluation below, it has been determined that counts collected prior to 2007 adequately represent traffic conditions in the year 2009, because they have the same or more levels of traffic as the 2009 or 2011 counts.

Use of traffic volumes that are higher result in a worse level of service. The City of Los Angeles' traffic impact criteria become more stringent as level of service worsens. Thus, intersections that operate at LOS D can increase volume to capacity (V/C) by 0.04 before a traffic impact would be considered, whereas at LOS F, a V/C increase of 0.01 would be considered significant. Thus, the use of the particular set of counts collected prior to 2007, as shown in the comparison table, would result in a more conservative and stricter assessment of the potential for Project impacts, than if 2009 counts were used for the particular intersections indicated in the comment. While the comparison count for Intersection 35 showed higher traffic volumes for the PM peak hour than in the Original DEIR, this would not affect the conclusions of the study, as the intersection has already been identified as having a significant traffic impact. Therefore, no revisions to the analysis are necessary.

Intersection	DEIR Existing Volumes		Verification Counts			Ratio of DEIR Volumes/ Verification Volumes	
	AM PH	PM PH	AM PH	PM PH	Count Date	AM PH	PM PH
35. Mission Road & Daly Street/Marengo Street	4,500	4,219	3,651	4,391	3/17/09	1.23	0.96
39. Hope Street/SR 110 & US 101 Southbound Off-Ramps & Temple Street	3,451	3,719	2,623	3,097	5/7/09	1.32	1.20
42. Hill Street & Alpine Avenue	2,757	3,385	N/A	2,998	3/15/11	N/A	1.13

27a-8 The comment states that, “three counts in particular, taken on 01/20/05, should be disregarded and updated due to having fallen on the week of Martin Luther King Jr. Day, which is a designated national holiday.”

See Response 27a-7. Counts collected in 2005 during the week of Martin Luther King Jr. Day, have been reviewed at Intersection 39, and have been determined to be higher than the verification count collected in 2009 during a non-holiday week. It is anticipated that similar patterns would prevail at Intersection 40 and 41 given their proximity to Intersection 39.

27a-9 The comment states that, “The results of the traffic study are substantiated by supporting data of the consultant’s model runs and a comprehensive validation/calibration effort conducted in cooperation with LADOT, as documented in the attached Appendix. With the exception of intersection capacity analyses which should be reanalyzed to reflect corrections to peak traffic volumes and/or intersection lane geometries as described in the above sections of this review, the methodology used in the traffic analysis and impact significance assessment is considered appropriate.”

As detailed in the response Responses 27a-7 and 27a-8, an analysis was conducted to verify the appropriateness of the peak hour traffic volumes applied in the Original DEIR analysis. As detailed in Response 27a-4, most lane configurations have been reconfirmed and are accurate and appropriate. Response 27a-4 details the intersections where lane configurations have been revised in concurrence with the comments.

27a-10 The comment states that, “two items within this section were not sufficiently addressed and/or given proper supporting documentation: 1) The project’s potential traffic impact on affected CMP facilities, and 2) Potential project impacts to transit system.”

The CMP requires that freeway mainline segments with greater than 150 project trips assigned to that particular segment be analyzed for the potential of Project impacts (see page B-2 of 2004 Congestion Management Program for Los Angeles County, Metro 2004 the applicable CMP at the time of DEIR scoping). The Project is expected to add less than 150 trips to all other CMP freeway monitoring segments. Therefore, no CMP analysis is required for those segments. No arterial monitoring stations were identified within the Project’s sphere of influence.

With respect to transit impacts, given the high level of transit service that exists in the area and the potential future changes in service to the light rail line, along with the mix of proposed land uses aimed at balancing the jobs to housing ratio, there are not expected to be any transit impacts. Additionally the comment provides no basis for a transit impacts, nor data or reference offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the transit impacts. However, the comment will be forwarded to the decision maker.

27a-11 The comment states that LOS results for the freeway CMP analysis are missing from Appendix 4D.

The CMP requires that freeway mainline segments with greater than 150 project trips assigned to that particular segment be analyzed for the potential for Project impacts (see page B-2 of 2004 Congestion Management Program for Los Angeles County, Metro 2004 the applicable CMP at the time of DEIR scoping). The Project is expected to add less than 150 trips to all other CMP freeway monitoring segments. Therefore, no CMP analysis is required for those segments.

27a-12 The comment states, “a more comprehensive analysis to address the potential for the CASP/RP to generate a significant level of additional transit passengers on the available transit capacity. Specifically, it is suggested that the Transportation Element use the results of its transportation demand model and traffic analysis to identify the estimated number of daily and peak hour trips to be generated by the fully-developed CASP/RP, and include a mode split analysis to determine the number of transit trips expected.”

The future transit capacity would depend on future service levels, which cannot be fully anticipated at this time because Metro and other study area service operators evaluate transit service bi-annually. Factors that are evaluated include ridership, and services are

adjusted to respond to ridership demands (e.g. increasing transit service to meet high ridership demand, or reducing transit service if ridership demand is low). While Metro anticipates operating the light rail lines (e.g. the Gold Line route) in the system with 5 minute headways in the future (which would increase rail transit capacity in the study area), future headways for the bus lines that serve the study area are not known. Because headways for bus lines are not yet known, and the number of buses per hour (as determined by headways) is the primary variable for determining overall transit capacity (because the capacity of bus vehicles are fixed), it is not possible to conduct the analysis as described in the comment.

27a-13 The comment states the Original DEIR should address ways in which the project will improve the circulation and accessibility of local fixed buses during oversaturated peak hour intersection conditions. The Project Alternative establishes new street and urban design standards that will enhance the accessibility of residents, employees and visitors alike to local buses. And while local bus service may expect some delays, along with the additional traffic, Metro may also, in response to growing bus ridership, increase the number of lines or bus service that frequent the area. In order to most effectively improve on-time bus performance the City, as part of the Mobility Element, will include a transit priority network that will provide full or part-time dedicated bus lanes and/or other transit enhancements (signal pre-emption, loading zones) to reduce travel delays.

27a-14 The comment states, “In reviewing the Transportation Element and accompanying traffic data provided in Appendix 4 of the DEIR, we were unable to assess or determine the validity of the conclusions set forth in this section due to the DEIR's lack of available supporting data for its assertions. In particular, the data tables in this section reference a 2010 study not included in the DEIR or within any other available resource. It is therefore our recommendation that the DEIR provide the appropriate supporting evidence, within the appendix if needed, with regard to the VMT analysis of the CASP. Technical data and/or reports should describe and tabulate:

- 1.) “How in/out project-related trips were estimated, including geographic and network factors, socioeconomic modeling parameters, modal splits and trip generation estimates and assumptions employed in the transportation demand model (TDM); and
- 2.) “Include a detailed summary of results and speed-VMT distributions for Los Angeles County, including those results reported in Tables 4-8 and 4-9 of the Original DEIR.”

The traffic study, which provided the underlying transportation analysis incorporated into the Original DEIR, is provided as Appendix 4A. The TDF model developed for the Proposed Alternative was used to estimate project related trips. As detailed in Response 27a-2, the TDF model is based on the SCAG model, with further detail provided in the subarea around CASP. The SCAG model development report, which provides detailed discussion of the model structure and parameters, is provided in Appendix A4. To model the effects of the Specific Plan, the socioeconomic data (jobs, housing, population, etc.) forecast for the Project Area under the Preferred Alternative were input into the Project

Area TAZs of the CASP TDF model. Trip generation rates for Preferred Alternative uses were determined based on the model's calibrated trip generation rates. The geographic distribution, the mode split and assignment of trips to the roadway network was determined by the model, following the processes developed for the SCAG model.

The model was used to estimate the vehicle miles traveled (VMT) for the Preferred Alternative. As described on page 4-50, Project related VMT estimates were developed by isolating only the modeled trips that start or end within the Project Area (including external trips that travel into the Specific Plan Area, trips that start in the Project Area and travel outside, and trips that are fully internal to the Specific Plan Area).

The model was also used to assess how the implementation of the CASP would affect regional VMT. The SCAG model (and the CASP model) rely on a gravity model to determine the flow of trips between an origin and a destination to determine trip distribution. As detailed on page 49 of the SCAG model development report, "The number of trips between zones in transportation models is a function of the attractiveness of a zone and the travel impedance between zones...The gravity model in this application will apportion the trips produced at each production zone among attraction zones according to the attractiveness of each zone and the disutility of travel for each trip interchange." In plain terms, the model determines the number of trip pairs between zones based on the number of producers (e.g. households) and the number of attractors (e.g. jobs) in the zones. Thus, the more attractors in a particular zone, the more trips will have destinations in that zone. Distribution also varies by the travel time between zones. Zones that are closer together (lower impedance) are more likely to have trips that travel between each zone pair, than zones that are spaced further away.

The CASP would add a substantial number of housing units to the Specific Plan Area, an area that is primarily industrial in nature, to address the localized jobs/housing imbalance in the Specific Plan Area. As noted in Table 2-2 of Section 4 Corrections and Additions, the current number of jobs in the Project Area is 2,908, and the current number of dwelling units is 1,488, a ratio of 2.0 jobs per dwelling unit, representing an existing jobs/housing imbalance. The Proposed Alternative is anticipated to have 10,546 jobs, and 8,776 dwelling units, a ratio of 1.20 jobs per dwelling unit, bringing the jobs/housing ratio into a closer balance. It is anticipated that many new residents of the Project Area would take advantage of proximity to workplaces in the Specific Plan area, while others would work in jobs rich centers such as Downtown Los Angeles, Los Angeles County/USC Medical Center, or other adjacent jobs centers that lack sufficient housing to accommodate anticipated future demand.

The model is sensitive to the increase in trip productions (residents) in the Project Area located more closely to jobs (attractors), as well as to the reduced travel distance (proximity to job centers) and travel time between the trip productions and attractions. Employing the gravity model, the CASP model redistributes regional trips to respond to the land use changes associated with the Proposed Alternative. This redistribution results in a modest decline in regional vehicle miles traveled (VMT) as trips that would have otherwise occurred between TAZs of greater distance get shorter associated with the provision of housing in the Specific Plan Area.

27a-15 The comment states that a map of existing average daily traffic volumes for study intersections and street segments, as well as a map showing the relative change in traffic volume at each study intersection, as required by LADOT Traffic Study Policies & Procedures (March 2002) are missing.

In reference to required maps, LADOT Traffic Study Policies & Procedures (March 2002) states, “The traffic study must include the following eleven dated maps unless otherwise specified during the scoping process...” The Original DEIR traffic study was thoroughly scoped with LADOT, and the study was reviewed by LADOT who determined that the study adequately met the requirements of LADOT Traffic Study Policies & Procedures.

27a-16 The comment states that there is insufficient evidence that affected transit operators received the notice of preparation.

Metro was on the City’s NOP distribution list. Metro verified that the NOP was received in a NOP response letter dated March 20, 2009.

27a-17 See Response 27a-4.

27a-18 See Response 27a-5.

27a-19 See Response 27a-6.

27a-20 See Response 27a-7.

27a-21 See Response 27a-8.

27a-22 The comment states that the Original DEIR traffic analysis does not provide a residential street segment analysis in accordance with LADOT’s guidelines, and notes that “the DEIR should indicate how the CASP plans to mitigate the potential diversion of motorists through local residential streets.”

A residential street segment analysis was not conducted for the Project as the comment notes. Within the Specific Plan area, there are only a few pockets of residential land uses, including the area between North Broadway and North Main Street east of the Los Angeles River, and the William Mead Public Housing development in the southwest portion of the Specific Plan area. Within these residential areas, the following streets are classified as local streets:

1. Cardinal Street
2. Ann Street
3. Bloom Street
4. Leroy Street
5. Magdalena Street

6. Bolero Lane
7. Avenue 17
8. Avenue 18
9. Avenue 19
10. Albion Street
11. Mozart Street
12. Darwin Avenue
13. Avenue 21

A residential street segment impact occurs when Project trips divert off the major arterials and collectors, and use residential streets as cut-through routes or bypass routes to avoid congestion on collectors or arterials. The residential streets listed above do not provide through connectivity, and cannot be used as bypass routes. Streets 1 through 6 above provide local access to the William Mead Public Housing development only, and do not provide connectivity to other destinations within the Specific Plan area. Streets 7, 8, and 9 do not provide direct connectivity between North Broadway and North Main Street, requiring a zig-zag path through the neighborhood, in contrast to Avenue 20, which is designated as a collector and provides direct access between North Broadway and North Main Street that would serve as the primary street used to traverse this residential neighborhood. Since Avenue 20 is designated as a collector, no residential street segment impact would be applicable. Given the very limited network of local residential streets within the Specific Plan area, and their very limited connectivity, no residential street segment impacts would be expected, and no detailed analysis is required.

Outside the Specific Plan area, the Project would not be expected to impact local residential streets, as the Project is expected to largely be beneficial to traffic conditions in adjacent areas, because more trips would be internal to the Specific Plan area, due to a much jobs-housing balance than is currently found in the Specific Plan area.

27a-23 See Response 27a-11.

27a-24 See Response 27a-12.

27a-25 See Response 27a-14.

27a-26 The comment states, “79 deficiencies identified in the above section may be individually or cumulatively understating, or otherwise imprecisely reporting, a clear estimation of the project’s potential impacts on the surrounding transportation system... Given that each of the deficiencies noted may understate or inaccurately report the estimated impact of the Project, it is possible that the cumulative effect of these deficiencies is masking additional significant impacts which should be addressed by further mitigation measures.”

The comment’s assertion that there are inconsistencies and/or discrepancies that understate or imprecisely report a clear estimation of the Project’s potential impact is

evaluated and responded to in response to the commenter's detailed comments. Based on the evaluation of the commenter's detailed comments, as described in the responses to comments that follow, it was determined that the Original DEIR adequately reported the project's potential impacts on the surrounding transportation system. Additional detail has been provided to respond to comments, and incorporated into the FEIR.

27a-27 The comment expresses concern that the Plan could potentially lead to gentrification and recommends the COD strategy as a mechanism to ensure that affordable housing opportunities are offered. The comment includes a detailed description of the COD. Please see response to comment 27-152.

27a-28 The comment expresses concern that the Plan would cause displacement of existing residents even though the majority of existing units in the Plan area are either restricted for a minimum of 55 years, publicly owned housing and therefore restricted in perpetuity as affordable, or subject to the City's RSO ordinance which limits rental increases or are restricted for a minimum of 55 years. Please see MR 1 on Displacement.

28. Southern California Association of Nonprofit Housing, Paul Zimmerman, Executive Director, November 23, 2011

28-1 See Response 14-1.

28-2 See Response 14-2.

28-3 See Response 14-3.

28-4 See Response 24-4.

29. Strategic Actions for a Just Economy, David Robinson, Political Director, November 17, 2011

29-1 The comment expresses support for the Southeast Asian Community Alliance's policy recommendations regarding the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

30. Tenemos que Reclamar y Unidos Salvar la Tierra (TRUST), South L.A., Sandra McNeill, November 23, 2011

30-1 See Response 14-1.

30-2 See Response 14-2.

30-3 See Response 14-3.

30-4 See Response 14-4.

31. United Neighbors in Defense Against Displacement (UNIDAD), David Robinson, Coordinator, November 23, 2011

31-1 See Response 14-1.

31-2 See Response 14-2.

31-3 See Response 14-3.

31-4 See Response 14-4.

32. Urban Rivers Institute, Environmental Planning & Sustainability Consultant, November 21, 2011

32-1 The comment states the DEIR incorrectly identifies the project as within the lower Los Angeles River Watershed. The text has been changed to indicate it is in the upper watershed.. See Section 4, Corrections and Additions.

32-2 The comment states the 110 freeway is incorrectly identified as the Pasadena Freeway. The text has been changed to reflect its proper designation of Arroyo Seco Parkway. See Section 4, Corrections and Additions.

32-3 The commenter's request that the setback along the Los Angeles River and the Arroyo Seco be extended from 50 to 100 feet is noted. Staff is evaluating revisions to setback recommendations. Comments shall be forwarded to the decision makers for further consideration.

32-4 Comment noted. Staff is evaluating revisions to Plan policy's to clarify the relationship between the Plan and both the Low-Impact Development (LID) and the Los Angeles River Improvement Overlay (LA-RIO) Ordinances.

33. Women Organizing Research, Knowledge, and Services (WORKS), Channa Grace, President and CEO, November 8, 2011

33-1 See Response 19-1.

33-2 See Response 19-2.

34. Women Organizing Research, Knowledge, and Services (WORKS), Channa Grace, President and CEO, November 23, 2011

34-1 See Response 14-1.

34-2 The comment expresses an opinion about the adequacy of analysis of alternatives and mitigation in the Original DEIR, but provides no facts, reasonable assumptions based on facts, or expert opinions supported by facts in support of its position. Original DEIR Proposed Alternative Proposed Alternative Proposed Alternative Original DEIR See

Responses 27-9 through 27-39 for discussions of housing affordability, displacement, land use, density, population projections, overcrowding, and jobs-housing balance. The commenter's concerns are noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

34-3 See Response 14-3.

34-4 See Response 14-4.

34-5 See Response 26-2.

35. Adela Juarez, October 15, 2011

35-1 The comment conveys a concern regarding the availability of affordable housing in the Proposed Alternative area, and does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

36. Janet Loera, October 15, 2011

36-1 The comment conveys a concern regarding the availability of affordable housing and childcare facilities in the Proposed Alternative area, and does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

37. Joyce Dillard, November 21, 2011

37-1 The comment states that the air quality will be affected since all air quality in the South Coast Air Basin has issues of compliance. The comment is noted. Chapter 11 of the Original DEIR found that the Proposed Alternative would result in an unavoidable significant operational air quality impact. Portions of the air quality analysis were revised finding that the Proposed Alternative would also result in a significant and unavoidable impact related to construction air quality and potential health risk due to existing TAC sources. These portions of the analysis were recirculated on May 31st, 2012 for public review pursuant to Section 15088.5 of the CEQA Guidelines. Mitigation Measures Air Quality 1 through Mitigation Measures Air Quality 12 were included to address air quality impacts to the maximum extent feasible. See Chapter 11 of the Original DEIR, and Section 2.A of the RP-DEIR for impacts due to air quality.

37-2 The comment states that trucks and industry (freeways and rail yards) are factors not taken into consideration. This portion of the air quality analysis was revised finding that the Proposed Alternative would result in a significant and unavoidable impact related to potential health risk due to existing TAC sources (from both industrial and freeways sources). These portions of the analysis were recirculated on May 31st, 2012 for public review pursuant to Section 15088.5 of the CEQA Guidelines. Additional mitigation was added in the RP-DEIR. Mitigation Measures Air Quality 2 through Mitigation Measures

Air Quality 10 were included to address air quality impacts to the maximum extent feasible. See Section 2.A.I of the RP-DEIR for health risk impacts due to TAC sources.

- 37-3 The comment claims that the Original DEIR makes no mention of “air pollution” from signage and lighting. The commenter does not provide any facts, or evidence based on facts that air pollution from lighting and signage would contribute to an air quality impact. On the contrary, the impact of new light sources is discussed in Chapter 5, Visual Resources of the Original DEIR, under Impact Visual Resources 6.
- 37-4 The comment pertains to light and noise pollution resulting from special events hosted in the Los Angeles State Historic Park. However, the commenter makes no statement concerning the analyses or findings of the Original DEIR, and provides no facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of its position. Therefore, no further response can be provided.
- 37-5 The comment suggests that the Original DEIR does not evaluate noise from the nearby Metro rail service. On the contrary, Section 12.1.1 of the Original DEIR discusses the railyard and train operation in the context of ambient noise. As specified in Table 12-3 of the Original DEIR, the spot noise measurement taken nearest to the railyard (Location Number 9) was 64dB, the lowest noise level recorded for this analysis in the Proposed Alternative area. The commenter does not provide any substantiating evidence that contradicts the findings in the Original DEIR.
- 37-6 The comment asserts that the Original DEIR’s utilities analysis is problematic, but provides no facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of its position. The comment further claims that the Original DEIR makes reference to an outdated plan from the Department of Public Works, and quotes at length an Environmental Assessment for a separate project. However, the commenter provides no statement relating the quoted document to the analyses or findings of the Original DEIR, nor any substantiating evidence that contradicts the analysis in the Original DEIR. Therefore, no further response can be provided.
- 37-7 The comment suggests that circulation, “including military passage,” be addressed in the Original DEIR. Chapter 4, Transportation of the Original DEIR provides a thorough analysis of transportation impacts. In addition, CEQA Guidelines Section 21098(d)(1) states that “The effect or potential effect that a project may have on military activities does not itself constitute an adverse effect on the environment.” Because the commenter makes no statement concerning any specific analyses or findings in the Original DEIR, no further response can be provided.
- 37-8 The comment contends that the Original DEIR does not address oil and mineral rights, leaking underground storage tanks (LUSTs), abandoned oil wells, potential future extraction of oil or gas, or methane.

The commenter does not characterize or explain the issue raised with respect to oil and mineral rights in the Proposed Alternative area. The Proposed Alternative encompasses the rezoning of mostly industrial land uses within the Proposed Alternative area to a mix

of uses, including commercial and residential. As such, an environmentally adverse change to oil and mineral rights is beyond the scope of the Proposed Alternative.

Mitigation measures for LUSTs are outlined in Table 2-1 of the Original DEIR.

Tables 10-1 and 10-2 of the Original DEIR indicate a total of 49 oil and gas wells in the Proposed Alternative area, according to data provided by the California Department of Conservation.

Section 6.1.4 of the Original DEIR discusses existing and future extraction of oil and gas, which is governed by both the Conservation Element of the City's General Plan and State law. The City of Los Angeles maintains primary authority over the issuance and monitoring of land use permits at drill sites.

Methane release is addressed in Section 10.3.2 of the Original DEIR, under Impact Hazardous Materials 8. Mitigations for explosion or release of methane gas are outlined in Table 2-1 of the Original DEIR.

Because the commenter makes no statement concerning any specific analyses or findings in the Original DEIR, no further response can be provided.

- 37-9 The comment claims that water supply, quality, and recycling, are not addressed in the Original DEIR. On the contrary, these issues are discussed at length in Chapter 7, Hydrology and Water Quality and Chapter 15, Utilities of the Original DEIR. The commenter further suggests that the Original DEIR fails to consider alternative methods for reclaiming stormwater, but provides no indication of what these methods are. Because the commenter makes no statement concerning any specific analyses or findings in the Original DEIR, no further response can be provided.
- 37-10 The comment indicates that the Original DEIR does not raise the possibility of using Hansen Dam as a water storage facility, but makes no statement concerning adverse effects to the physical environment. Furthermore, Hansen Dam is located nearly 20 miles away from the nearest boundary of the Proposed Alternative area. Therefore, no further response can be provided.
- 37-11 The comment suggests that total maximum daily loads (TMDL) be addressed in the Original DEIR. TMDL describes the maximum amount of a pollutant that a body of water can receive in one day without violating water quality standards. In fact, TMDL is discussed in Section 7.1.4 of the Original DEIR, as well as Impact Hydrology and Water Quality 3. As the Los Angeles Regional Board's Basin Plan will guide the implementation of stormwater treatment strategies throughout the Proposed Alternative Area, this impact was found to be less than significant. The comment provides no substantiating evidence that contradicts the analysis in the Original DEIR.

The comment further claims that "lead has been found at Albion Dairy," presumably in its water supply, but provides no facts, reasonable assumptions based on facts, or expert

opinion supported by facts in support of its position. Therefore, no further response can be provided.

- 37-12 The comment suggests that the Original DEIR address 100-year floodplains and liquefaction. 100-year floodplains are discussed in Section 7.1.3 of the Original DEIR, as well as Impact Hydrology and Water Quality 1. Liquefaction is discussed in Section 6.1.1.4 of the Original DEIR, as well as Impact Earth Resources 2. Mitigations are outlined for both of these impacts, reducing them to less-than-significant levels. Because the commenter makes no statement concerning any specific analyses or findings in the Original DEIR, no further response can be provided.
- 37-13 The comment suggests that mitigation measures be provided for geology, soils, and soil sediment, but provides no facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of its position. Because the commenter broadly describes geology, soils, and soil sediment as “issues” without identifying specific impacts in need of mitigation, no further response can be provided.
- 37-14 The comment suggests that sea level rise and the Southern California Bight be addressed in the Original DEIR. The Proposed Alternative conforms to State law regulating climate change and emission of greenhouse gases (i.e. AB 32 and SB 375), as explained in Sections 13.1.6.6 and 13.1.6.7 of the Original DEIR, as well as Chapter 16, Energy and Greenhouse Gases. Subsequent impact on sea level change is too speculative to warrant evaluation in the EIR, per CEQA Guidelines Section 15064(d)(3). Because the commenter makes no statement concerning any specific analyses or findings in the Original DEIR, no further response can be provided.
- 37-15 The comment suggests that the Los Angeles Basin Plan, watersheds, and groundwater basins be evaluated in the Original DEIR. In fact, all four subjects are discussed in Chapter 7, Hydrology and Water Quality of the Original DEIR. In particular, the Los Angeles Regional Board’s Basin Plan is discussed in Section 7.1.9.2; watersheds, in Section 7.1.2 and 7.1.4; and groundwater basins, in Section 7.1.6. These subjects are further discussed in Impact Hydrology and Water Quality 3. The commenter provides no substantiating evidence that contradicts the analysis in the Original DEIR, which concludes that the Basin Plan, in concert with federal programs and local ordinances, is sufficient to ensure that future development in the Proposed Alternative area complies with all water quality requirements. Because the impact was found to be less than significant, no mitigation is required.
- 37-16 The comment suggests that “forests and effects from fires,” as well as relevant mitigation, be discussed in the Original DEIR. In fact, the risk of fire in Elysian Park is addressed in Section 10.3.1 of the Original DEIR, which concludes that the Proposed Alternative does not affect the likelihood of future wild lands fire. In the absence of an environmental impact, no mitigation can be provided. The commenter provides no substantiating evidence that contradicts the analysis in the Original DEIR.
- 37-17 The comment suggests that a number of public services be discussed in the Original DEIR, including fire protection, police, and emergency services. In fact, these services

are discussed throughout Chapter 14, Public Services and Recreation Facilities of the Original DEIR. In particular, fire protection is discussed in Section 14.1.2; police, in Section 14.1.1; and emergency services, in Section 14.1.3. These subjects are further discussed in Impact Public Services and Recreation Facilities 1, which was found to be less than significant on account of standard, citywide development procedure that mandates LAPD and LAFD review of all specific projects.

The comment also states that “hospital accessibility... is a critical piece of infrastructure.” Impacts to emergency vehicle access are discussed in Section 4.3.2.2, and found to be less than significant. Because the commenter makes no statement concerning any specific analyses or findings in the Original DEIR, no further response can be provided.

37-18 The comment suggests that “measures for” the Metro Bomb Squad, “including national security issues,” be discussed in the Original DEIR. However, the commenter does not characterize or explain the issues raised with respect to the Bomb Squad, and makes no statement concerning adverse effects to the physical environment. Therefore, no further response can be provided.

37-19 The comment suggests that endangered species be “addressed in more accurate terms” in the Original DEIR. The commenter specifically notes the presence of the Santa Ana Sucker, a vulnerable species according to the International Union for the Conservation of Nature, in the Los Angeles Watershed. The proximity of the Santa Ana Sucker’s habitat is discussed in Section 8.1.7.1, which specifies that the Critical Habitat is located roughly 15 miles north of the Proposed Alternative area. Because the commenter does not identify any specific inaccuracies in the Original DEIR’s discussion of endangered species, no further response can be provided.

37-20 The comment pertains to the Los Angeles River Master Plan and Proposition K projects. However, the commenter neither clearly states the request nor raises an issue concerning adverse effects to the physical environment. Therefore, no further response can be provided.

38. Ken Montenegro, November 17, 2011

38-1 The comment expresses an opinion concerning the need and opportunities for increased affordable housing in the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

38-2 The comment expresses an opinion concerning public consultation on the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

38-3 The comment presents recommendations to ensure safe access to green space for the Proposed Alternative, and does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in

taking action on the Proposed Alternative. Traffic impacts are discussed in Section 4.3, and existing conditions of hazardous materials are addressed in Section 10.1.

39. Richard D. García, October 15, 2011

39-1 The comment conveys a concern regarding the availability of affordable housing in the Proposed Alternative area, and does not address the analyses or findings of the Original DEIR. The comment is noted and will be forwarded to decision makers for their consideration in taking action on the Proposed Alternative.

40. Clyde T. Williams, November 21, 2011

40-1 The comment makes broad claims regarding the adequacy of analysis and mitigation provided in the Original DEIR, and suggests that the Original DEIR be recirculated. These claims are addressed in response to individual comments below. Based on the evaluation of these comments, as described in their respective responses, it was determined that the Original DEIR adequately reported the project's potential impacts and offered adequate mitigation. Additional detail has been provided to respond to certain comments, as applicable, which will be incorporated into the FEIR.

40-2 The comment asks about the combined effects of real estate trends in the area. The comment does not provide any additional analyses, facts or findings that supplement and/or contradict the analyses and conclusions of the DEIR.

40-3 The comment claims a general description of roadway service in the project area is contradicted by the number of intersections and LOS rankings of freeways but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the inadequacy of the description.

40-4 The comment seeks clarification on a time reference, specifically the exact span of years referenced in "the past five years"...but provides no reference to the document to understand where more detail is needed.

40-5 The comment speculates the Proposed Alternative will not work successfully since previous activity in the project area was not guided properly but does not provide any additional analyses, facts or findings that supplement and/or contradict the analyses and conclusions of the DEIR.

40-6 The comment suggests language in the introduction is too broad and therefore inadequate for the document. The commenter urges the DEIR to be revised and recirculated but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the claimed inadequacy.

40-7 The comment suggests general project descriptions made in the introduction are inadequate and should be specific and exhaustive or include references to specifics

elsewhere in the document but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the claimed inadequacy.

- 40-8 The comment seeks clarification on the Redevelopment Plan portion of the Proposed Alternative and takes issue with the use of general language demanding specific definitions or references for each outline, suggesting the document is inadequate for that reason. The comment provides no facts, reasonable assumption based on facts, or expert opinion supported by facts supporting this claim. The details of the Redevelopment Plan component of the Proposed Alternative would have been a product of the Community Redevelopment Agency, due to the dissolution of the Community Redevelopment Agency, the Proposed Alternative area will not be a redevelopment project area anytime in the foreseeable future. The details of the Specific Plan are included in the Specific Plan document, including the stated goals (“Purposes”) of the plan.
- 40-9 The comment is a duplicate of comment 40-8. See Response to comment 40-8.
- 40-10 The comment claims the map in figure 1-1 is not consistent with other maps within the DEIR but does not specify the inconsistencies.
- 40-11 The comment alleges the DEIR does not meet CEQA requirements but does not provide any additional analyses, facts or findings that supplement and/or contradict the analyses and conclusions of the DEIR.
- 40-12 The comment appears to suggest the Redevelopment Plan (“Redeployment Plan”) component represents a separate land-use plan requiring a separate EIR. The Redevelopment Plan component was essentially a funding mechanism for implementation of the Proposed Alternative and contains no land-use changes and therefore required no additional EIR. Because the component is the product of a separate agency it is manifest as a separate “plan.” However due to the dissolution of the Community Redevelopment Agency the Proposed Alternative area will not be a redevelopment project area anytime in the foreseeable future.
- 40-13 The comment states, “Without required specific quantified mitigation requirements and conditions for ministerial consideration and compliance, all subsequent “projects” must undergo further CEQA considerations and must be deemed to not meet the City’s clearance procedure. Provide revised draft EIR and a complete RP and CRA mechanism Process and recirculate.”

As the EIR is a programmatic document and there are no specific development projects proposed at this time, future applicants will need to demonstrate that the project property satisfies the prevailing standards and mitigations set forth in the Proposed Alternative.

- 40-14 The comment states, “As no “standards” are specifically referenced, defined, and quantified all “projects” must be provided as “Supplemental” or Subsequent) EIRs and then certified before approvals. Provide revised DEIR along with a specific subsequent review Process and recirculate.”

As the EIR is a programmatic document and there are no specific development projects proposed at this time, future applicants will need to demonstrate that the project property satisfies the prevailing standards and mitigations set forth in the Proposed Alternative. A proposed project within the project area that complies with the Specific Plan's standards and is limited in scope requires no further environmental review. A proposed project within the project area that does not comply with the Specific Plan standards or is of sufficient scope to warrant a Project permit Compliance would require additional environmental review.

40-15 The comment suggests the use of 2000 Census data is inadequate for the purposes of the DEIR and must be updated to 2010 data and recirculated. At the time that the NOP was released the 2010 Census had not been completed and therefore the information was not available. The DEIR utilized the most up to date information available that was available at the time.

40-16 See Response 40-12.

40-17 The comment suggests the general project description is inadequate and should be specific and exhaustive or include references to specifics elsewhere in the document. The comment does not provide any additional analyses, facts or findings that supplement and/or contradict the analyses and conclusions of the DEIR.

40-18 The comment states, "Define "careful", characteristics, potential, opportunities, constraints, corresponding, majority. Without clear and consistent definition of these terms they render the Chapters and perhaps the entire DEIR and Chapters as non-objective and therefore inadequate and incomplete for meaningful review and comments."

The referenced passage is written to convey meaning, each word is not intended to have a strict, legal definition. Rather the passage is meant to describe in general the scope of consideration taken by the authors when crafting the Proposed Alternative. The comment does not provide any additional analyses, facts or findings that supplement and/or contradict the analyses and conclusions of the DEIR.

40-19 See Response 4-12.

40-20 The comment states there is no definition of the Hybrid Industrial land use designation available. General Land Use categories are defined by the zones that are permitted within a particular category which in this case would include the Urban Innovation, Urban Center, and Urban Village zoning districts.

40-21 The comment states, "All district appear to contain similar elements and no distinctions are provided other than those given in the unreferenced anywhere appendix 7B, LADWP Water Supply Assessment, which does include populations, dwelling sizes, and floor space for retail, offices, and light industrial uses."

The new zoning districts, and the uses that are permitted within them are detailed in the Specific Plan document under “Zoning Districts.”

- 40-22 The comment states, “No definitions are provided for “Small-Scale”, craftsman, artisan, creative and cognitive, activities and uses and production, and therefore the designations are considered incomplete and inadequate. Please see response to comment 40-20 above.

The comment further states, “Proximity to fixed rail (presumably stations rather than tracks) is mentioned without definition and is not adequately presented in the relevant Transportation assessment (Vol. 1-Chapter 4). Provide revised, referenced, and coordinated complete and adequate Draft EIR and recirculate.” The comment provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the claim.

- 40-23 The comment suggests Table 2-1 should not be included in the Project Description chapter or should be generalized as it takes up too much space and is an impediment to the purpose of the chapter. Table 2-1 has been relocated to Section 1.4 see Chapter 4 Corrections and Additions.

- 40-24 The comment states, “No adequate list of Program Assumptions is provided only the limits on various factors without a single set of Policies, Goals, Needs, and Objectives and their related assumptions for the CASP.” The comment provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the claim.

- 40-25 The comment states, “Current as of 2003 (presumably based on 2000 Census) is not reflective of current conditions especially if using a 2011 (or 2010) report. The comment provides no further reference to adequately identify the topic of concern. In general, data included in the DEIR represents the most recent data available at the time that the DEIR was undertaken.

- 40-26 The comment states, “Landuse classifications are not consistent with those in the DEIR,” but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the claim.

- 40-27 The comment states, “No City of LA, DCP Report of 2011 (2010, Retrieved in 2011), in references; retrieval is irrelevant and suggests recent study rather than pre-2010 Census study Provide revised Draft EIR with updated coordinated and referenced information and tables and recirculate.” but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the claim.

- 40-28 The comment states, “No specific and adequate set of Policies, Goals, Needs, Purposes, and Objectives and assumptions is provided in or reference by the CASP. No definitions and references are provided for many terms used without adequate incorporation with other sections, e.g., for Transportation (Vol.1, Chap.4): Easy walk, Walking distance, Access, and Lessen dependence on automobiles. Provide revised Draft EIR with well-defined, coordinated, and referenced information and tables and with clear relations of Goals, Objectives, Purposes, Needs, and Policies and recirculate.” The comment provides

no facts, reasonable assumption based on facts or expert opinion based on facts that would require additional analysis.

40-29 The comment states, “No Transportation or Circulation standards are provided for transit facilities: road stop, laybys, stations, signal over-rides, etc. No transit options are provided for safe and convenient mobility. Provide one set of consistent ‘Pedestrian Oriented’ requirements for land use and transportation related facilities and conditions for all subsequent CEQA consideration. Provide revised Original DEIR with updated coordinated and referenced information and tables and recirculate.” The comment provides no facts, reasonable assumption based on facts or expert opinion supported by facts to conclude that the Proposed Alternative would have an impact on transportation or transit services.

40-30 In relation to the plan’s goals of strengthening regional bike routes, the comment states, “No definition of ‘strengthens’ is provided, and no regional, Study Area, or Project Area bicycle routes are provided. No coordination, circulation, or connection is provided for the CASP and the L.A. River or Arroyo Seco for “Future Routes”.

“Strengthens” is defined as improvement of bike routes through the Specific Plan area. Figure 4-7 on page 4-29 of the Original DEIR illustrates the extensive bicycle routes network proposed as part of the Specific Plan. As shown on the figure, the Specific Plan includes the extension of the Los Angeles River and Arroyo Seco Bike Paths, with connections being provided to the Los Angeles River bike path on Figueroa Street and Avenue 19, and connections to the Arroyo Seco Bike Path provided at Avenue 19.

40-31 The comment states, “This section and the Transportation Chapter 4 are not cross-coordinated or referenced and thereby provide contradictory statements and appear to be inadequate and incomplete with regard to ‘Complete Streets’ or ‘Complete Mobility’ Provide revised Original DEIR with updated coordinated and referenced information and tables and recirculate.” The comment does not identify “this section” and therefore provides no facts or information upon which to provide more detailed or clarifying information.

40-32 The comment states, “Major highways are not delineated; no Complete Street Stand is provided, transportation goals of this CASP are not stated and applied to the designs, inconsistent use of Light and Local Industrial streets is shown between text and figure (figures take precedence over text in contracts), street parking is not delineated within the Project Area. The Project Description is not coordinated with the Transportation Chapter 4, and neither references the others. No discussion is provided for the Major Highway streets and their relationships to other lower classed street and how they work together and how they relate to the Pass-Through traffic and both Rail/Road transits. No specific standards provided for Light/Local Industrial Streets. For a pedestrian oriented development not to have sidewalks does not adequate provide support for the approach to development. Provide revised Original DEIR with updated coordinated and referenced information and tables and recirculate.”

The delineation of Major Highways and other roadway designations are illustrated in Figure 2-3 on page 2-21 of the Original DEIR. Major Highways generally carry higher traffic volumes, and provide more regional access, collectors generally provide access from Major Highways to local neighborhoods, and local streets provide access to individual properties. Regional pass-through traffic typically uses freeways or Major Highways because they provide the most capacity at the highest speeds. Bus transit service typically operates on Major Highways and to a lesser extent, Collectors. Transit typically does not operate on local streets. Rail transit typically operates in its own right of way, and is not associated with roadway classification. Standard cross sections of Light Industrial Modified Streets and Local Modified Streets are provided in Figure 2-2 on page 2-19 of the Original DEIR. Sidewalks are included in all cross sections with the exception of Modified Alleys. No revision to the Original DEIR is required, as all information referenced in the comment is contained in the Original DEIR.

40-33 The comment states that the “use of Residential, Nonresidential, and “Mixed-Use” categories is inconsistent with the Hybrid categories used elsewhere but provides no facts, reasonable assumptions based on facts, or expert opinions supported by facts in support of its position.

40-34 The comment states, “Street parking should be clearly designated either in this or Chapter 4 and should be consistent with the designated land use categories. Specific Standards would also be graphically illustrated as the categories and ‘requirements’ are not directly related to the Hybrid categories.”

In general, the location of street parking is identified in the street cross-sections illustrated in the draft Cornfield Arroyo Seco Specific Plan, otherwise referred to as the Proposed Alternative.

40-35 The comment argues the discussion of Block 52 Options is not appropriate for the Project Description chapter. The comment does not provide any additional analyses, facts or findings that supplement and/or contradict the analyses and conclusions of the DEIR.

40-36 The comment states, “As the RRC is a separate entity, and appropriate Plan with goals, objectives, purposes, needs, etc., would be required.”

The EIR is a programmatic document and there are no specific development projects proposed at this time, future applicants will need to demonstrate that the project property satisfies the environmental quality of the prevailing standards.

40-37 See Response 40-36.

40-38 The comment suggests “Modified Project Alternative” is an inappropriate label for Block 52 Options and represents a misuse of resources or attention. The comment also suggests there should be more Modified Project Alternatives for different uses. The comment does not provide any additional analyses, facts or findings that supplement and/or contradict the analyses and conclusions of the DEIR.

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- 40-39 The comment states that without identified specific projects and estimated dollar amounts the Redevelopment Plan component is incomplete. The EIR is a programmatic document and there are no specific development projects proposed at this time, any estimate of project size or cost would be remote and speculative. Also due to the dissolution of the Community Redevelopment Agency, the Proposed Alternative area will not be a redevelopment project area anytime in the foreseeable future.
- 40-40 The comment apparently seeks a description of the vision of the Specific Plan to be included in the FEIR. The vision of the Specific Plan is found in the Specific Plan under “Vision” and will not be included in the EIR.
- 40-41 The comment seeks monetary estimates relating to the proposed tax-increment financing district of the Redevelopment Plan component and specific language limiting the use of said funds. Those matters are outside the scope of an EIR and due to the dissolution of the Community Redevelopment Agency, the Proposed Alternative area will not be a redevelopment project area anytime in the foreseeable future.
- 40-42 The comment states, “Provide a base case of housing provisions in the CASP/RP of anticipated general distribution of housing for all residents of all income levels. Provide distribution by income for residents within 500ft of rail transit stops. Provide approximate capacity of rail transit stations and how capacity/supply relates to the demand/denser residential units located near (500ft to 15 minute/2500ft pedestrian walking time.”

The EIR is a programmatic document and there are no specific development projects proposed at this time. Changes to zoning are detailed in the Specific Plan, and outlined in the Introduction of the DEIR, any detail beyond that would be remote and speculative. The future transit capacity would depend on future service levels, which cannot be fully anticipated at this time, because Metro, and other study area service operators evaluate transit service bi-annually. Factors that are evaluated include ridership, and services are adjusted to respond to ridership demands (e.g. increasing transit service to meet high ridership demand, or reducing transit service if ridership demand is low). Also due to the dissolution of the Community Redevelopment Agency, the Proposed Alternative area will not be a redevelopment project area anytime in the foreseeable future.

- 40-43 The comment states, “Provide anticipated/planned re-purposing for public lands (including – State, LACo., LACity, and various public entities).”

The EIR is a programmatic document and there are no specific development projects proposed at this time. Changes to zoning are detailed in the Specific Plan and outlined in the Introduction of the DEIR, any detail beyond that would be remote and speculative. Also due to the dissolution of the Community Redevelopment Agency, the Proposed Alternative area will not be a redevelopment project area anytime in the foreseeable future.

- 40-44 The comment suggests that the project is deficient in its analysis of first mile/last mile transportation options but provides no facts, reasonable assumptions based on facts, or expert opinion supported by facts attesting to the claim.
- 40-45 The comment seeks information regarding the proposed Redevelopment Plan component that is outside the scope of an EIR. Further due to the dissolution of the Community Redevelopment Agency, the Proposed Alternative area will not be a redevelopment project area anytime in the foreseeable future.
- 40-46 The comment states that the Adelante Redevelopment Project area is incorrectly labeled. The comment and maps are accurate and no correction is necessary.
- 40-47 The comment seeks the inclusion of documents from SCAG referenced in the DEIR. The comment provides no facts, or reasonable assumptions based on facts to conclude that the addition of the SCAG documents would provide additional information that would lead to an identifiable impact.
- 40-48 The comment requests that the Whiteside and BioMed areas be referenced. See comment 40-46.
- 40-49 The comment states, “Land use designation are not expanded they are new and old terms are removed; all designations would include “light industrial” uses. Provide revised text.” The Hybrid Industrial Land Use designation is added to the community plans, in addition to the existing land use designations used elsewhere in the community plans and therefore no text change is needed.
- 40-50 The comment states, “Provide by block, in appendices, “controlled” percentages for each existing and proposed/Hybrid land uses.”
- The EIR is a programmatic document and there are no specific development projects proposed at this time. Changes to zoning are detailed in the Specific Plan and outlined in the Introduction of the DEIR, any detail beyond that would be remote and speculative.
- 40-51 The comment states, “Multiple Family Residential eliminated as use in Central LA Community Plan Remaining in NELA is single??/Multifamily residential Provide revised text.”The comment does not provide sufficient information on which to comment.
- 40-52 The comment states, “No mention is made of Residential Multi-Family zoning or Residential single Family in SE portion Provide.”The comment provides no facts, or reasonable assumptions based on facts as to why the requested text change is necessary.
- 40-53 The comment states, “No physical RD plan is provided, and various “program” elements have not been assessed as to how they may accelerate or change the implementation. Although the Community Planning components may not be directly affected by the presence or absence of the RD Plan, economic program elements would emphasize increasing incremental tax revenues which would increase capital investments with

largest structure and highest sale and rental rates.. Provide revised text.” The Redevelopment Plan is no longer feasible in the foreseeable future.

- 40-54 The comment questions the veracity of the statement that implementation of the Redevelopment Plan component will not result in any conflicting land use changes but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the claim. The Redevelopment Plan component involved no land use changes. Further, due to the dissolution of the Community Redevelopment Agency, the Proposed Alternative area will not be a redevelopment project area anytime in the foreseeable future.
- 40-55 The comment states, “As indicated elsewhere the ‘Study Area’ is identified but is inadequately defined especially as they relate to ‘pass-through’ (=commuter) corridors, e.g., Figueroa/San Fernando Road, Pasadena, Broadway, Valley-Main, and Mission, and ‘dispersion’. These four commuter corridors represent the primary access for most NELA and western and even central San Gabriel Valley commuters. These commuters are largely ‘dispersion’ traffic from the I-10, SR 110, and I-5/SR 2. As no adequate information, analyses, or impacts are provided by corridors no adequate assessment of ‘dispersion’ can be made.”

The City of Los Angeles traffic study guidelines do not require a specific analysis of arterial corridors, but directs that intersection level of service (LOS) analysis be conducted. As illustrated on page 4-3 of the Original DEIR, several analyzed intersections are included on all of the arterial corridors mentioned in the comment. The LOS analysis conducted in accordance with required City of Los Angeles methodologies and procedures analyzes the potential for Project impacts. The travel demand model developed for the PROPOSED ALTERNATIVE uses an iterative traffic assignment procedure, whereby congestion on a particular roadway link would shift to a parallel link if one is available and would provide a quicker travel time. Iterations are run until the model assignment comes into an equilibrium whereby no single trip could be made quicker without making another trip longer. The volumes output from the model, which form the basis of the LOS analysis, account for the dispersion of traffic. Existing traffic counts collected at study intersections include all traffic volumes traveling through the intersections, including any traffic dispersed from congested corridors.

The Specific Plan aims to reduce regional cut-through trips through addressing the significant jobs/housing imbalance that exists in the Project Area today, which will reduce the number of long regional commute trips that pass through or have a destination in the Specific Plan area.

- 40-56 The comment states, “Many commuters do disperse to the various corridors as alternatives to the congested freeway because the arterial signal sequencing effectively provides a preferred commuter route compared to the freeways. No section is proved regarding the effective speeds of the major corridors as established by the signalization which appear to be set at or above the posted speed limits.”

The Original DEIR is evaluating the Proposed Alternative that will guide land use changes and transportation improvements with the Project Area, over the life of the Plan. The Specific Plan is not a detailed traffic operations plan to address signal synchronization and travel speed on corridors within the Specific Plan area. The City of Los Angeles does not have criteria to evaluate the significance of changes to travel speeds. The City of Los Angeles has implemented computer-controlled synchronized traffic signal systems called the Automated Traffic Surveillance and Control System (ATSAC), and the Adaptive Traffic Control System (ATCS). These systems dynamically respond to traffic volumes at intersections, and adjust signal timings to ensure optimal traffic flows. Speed limits are set by determining the 85th percentile speed on a roadway based on speed surveys.

- 40-57 The comment states, “Dispersion does occur but is based on the commuters real-time assessments of three main commuter focal points: Valley vs I-10, Broadway vs Main vs Mission, and Figueroa/Huntington-Mission vs SR-110. Traffic flow patterns are largely established east of the assessed Project Area and Study Area. Study Area needs to include the Broadway/Mission and the Figueroa/Pasadena decision points.”

See Response 40-55.

- 40-58 The comment states, “Unfortunately no potential transportation impacts or benefits can be ascribed to rail and road transit system as no information is provided regarding their existing or ultimate capacities, demands, and potential mitigation.”

The travel demand model used to evaluate the Proposed Alternative includes all transit lines within the Project Area, and the presence of this transit service affects the mode choice stage of the model.

The future transit capacity would depend on future service levels, which cannot be fully anticipated at this time, because Metro, and other study area service operators evaluate transit service bi-annually. Factors that are evaluated include ridership, and services are adjusted to respond to ridership demands (e.g. increasing transit service to meet high ridership demand, or reducing transit service if ridership demand is low). While Metro anticipates operating the light rail lines in the system with 5 minute headways in the future (which would increase rail transit capacity in the study area), future headways for the bus lines that serve the study area are not known. The headways for bus lines are not yet known, and the number of buses per hour (as determined by headways) is the primary variable for determining overall transit capacity (because the capacity of bus vehicles are fixed).

- 40-59 The comment states, “Absences of corridor, signal-sequencing, and transit from baseline, assessment, and mitigation renders the Chapter (and the supporting Appendices) largely incomplete and inadequate.”

The impacts of the specific plan are evaluated per City of Los Angeles requirements and guidelines. A detailed signal-sequencing study is not applicable to the Specific Plan, and the transit network is included in the travel demand model. Therefore, the Original DEIR

is complete and adequate. Comment 40-58 details a performance measure to ensure that future transit service meets future demand.

- 40-60 The comment states, “This Chapter does not consider the effects and mitigation required for a successful “pedestrian-oriented” project, e.g., dispersion of more automobile traffic from freeways to arterials and traffic management measures required to less this dispersion.”

The connection between a pedestrian oriented project and traffic dispersion from freeways to arterials implied by the comment is not understood. The Specific Plan will address the existing jobs/housing imbalance, and improve pedestrian and bicycle in the Specific Plan area, thereby reducing the length and frequency of vehicle trips per household.

- 40-61 The comment states, “Acquire, review, assess, and mitigate corridor, signalization, and transit elements. Provide a revised and updated information base for re-modeling the Project Area and Study Area traffic and transit movements.”

The modeling of the Project and impact analysis contains all necessary elements, and revisions to the analysis provided in the Original DEIR and remodeling are not necessary.

- 40-62 The comment states, “The 43 intersections and networks were analyzed without including public transit and without 2010 census, land use, and ridership information. Review and incorporate 2010 census, land uses, and transit ridership information in the models. Revise projections, re-assess impacts and mitigation, and provide an updated DEIR, Chapter 4 and appendices.”

The travel demand model prepared for the CASP study area contains the full public transit network for the region. An effort was conducted to ensure that the transit network and headway information contained in the model accurately reflects the level of transit service in the Specific Plan area. The model includes transit ridership on transit lines in its mode choice model step. The CASP model uses the Census and land use inputs of the SCAG model, updated to reflect the proposed build out of the Specific Plan. The 2010 United States Census data was not available at the time of the development of the CASP model. As detailed in Appendix 4C, the model was validated in accordance to procedures/guidelines established by the California Department of Transportation (Caltrans), and was determined to adequately assess the existing transportation conditions of the 2009 base year for the CASP study area. Thus, it is not necessary to revise modeled projections and re-assess impacts because public transit, the most recently available Census data, and land use and ridership information were all factors in the modeling process.

- 40-63 The comment states, “Within the Transportation Study Area assessment of the Mission/Main/Valley intersection is erroneous and several intersections are either mislabeled, misidentified, or incompletely described, or are not consistently designated (#20, #21, #35, #36, #37, etc.). AM/PM commuter parking restrictions are not fully

reflected in the various traffic facilities and their volumes (e.g., Broadway – East and West of the I-5 and LA River and in Chinatown vs Lincoln Heights).”

As detailed in responses to comments, peak period parking restrictions are correctly reflected in the existing traffic counts, as well as the modeled traffic volumes. Text and figure corrections need to be made, but the analysis contained in the Original DEIR is accurate. The analysis of Intersection 37 is also correct and adequate. Study intersections were determined in accordance with LADOT, who concluded that the intersections surrounding Intersection 37 were not necessary to analyze given their location on the far eastern edge of the study area. The comment letter lists intersections 35 and 36, and has question marks and information in bold. The meaning of the question marks and bold in reference to those intersections is not understood. Figure 4-1 is correct, the accompanying text will be corrected where needed to reflect this. See section 4 Corrections and Additions.

- 40-64 The comment states, “Traffic volumes from the existing industrial areas have very high components of Heavy Duty Trucks between the various logistic centers and the various freeway access points, and future continued and expanded industrial land uses are proposed. No modal separation is provided for any traffic assessment, especially Main<>Daly<>Mission<>I-5; truck traffic at Mission/Daly/Marengo is well know to be a major intersection/turning problem. No assessment is provided as to the potential impacts.”

Bus volumes and heavy truck volumes are included in the overall traffic volumes collected for the analysis in the Original DEIR. Most of the land use changes of the Specific Plan would occur in the existing industrial areas of the Specific Plan area. The land use designation, as described on page 2-15 of the Original DEIR would redevelop existing industrial with Urban Village Urban Innovation and Urban Center uses. These uses would allow small scale craftsman and artisan activities, light industrial, creative and cognitive production, and research and development. Heavy industrial uses would not be permitted. Thus, the heavy truck volumes generated by the uses of the Specific Plan at buildout, would be less than the existing uses of the Specific Plan area. Therefore, heavy truck volumes are not expected to make up a large enough percentage of traffic to have a major effect on intersection operation that would require revisions to the analysis to account for this effect.

- 40-65 The comment states, “No assessment is provided for existing and future capacities and conditions for road transit – both MTA and LADOT/DASH buses (and others) - and rail transit – Gold Line and California High Speed Rail (LAUS-Palmdale).”

See Response 40-58.

- 40-66 The comment states, “There is no mentioned of the many LACo/USC Medical Center buses.”

Los Angeles County/University of Southern California Medical Center is located outside of the Specific Plan Area, and is at the periphery of the study area, so the shuttle buses

associated with the medical center would not be necessary to mention in the Original DEIR.

- 40-67 The comment states, “Although the bus lines and Gold Line transit facilities are identified, frequency/headways, passenger capacities, ridership/productivity etc. are not provided.”

Frequencies, capacities, and ridership for the transit network are included in the CASP model, and are a factor in the mode choice assignment phase of the model. The traffic volumes analyzed in the Original DEIR account for the usage of transit in the model.

- 40-68 The comment states, “Prospective pedestrian ridership is not assessed for both the Ave.26/Lincoln Heights/Arroyo Seco and Chinatown Stations; nor are the future prospective ridership assessed for pedestrian access to each station (population with 500ft radius of station).”

See Response 40-58.

- 40-69 The comment states, “The Assessment does not include the many LADOT studies for the Riverside Dr. Bridge, Figueroa/San Fernando Road Roundabout, Broadway, Spring Str., Chavez, and First Str. Bridges and their existing and future capacities.”

The analysis contained in the Original DEIR includes the Riverside Drive Bridge, the Figueroa/San Fernando Road Roundabout, Spring Street Bridge, 1st Street Bridge, and Broadway improvements. The roadway capacities of these improvements are included in the model, and accounted for in the model trip assignment process.

It is not clear what the Chavez Bridge project refers to. A recent search on the Bureau of Engineering Uniform Project Reporting System website describes a roundabout for the Cesar Chavez Avenue, Lorena Street and Indiana Street intersection. However, such improvements are designed to be capacity enhancing and would not contribute to a cumulative traffic impact under the Proposed Alternative.

- 40-70 The comment states, “Although the entire road commuter demand for downtown access passes through four bridges (Mission-Chavez, Valley/Mission-Main, Broadway, San Fernando-Figueroa-Pasadena-Spring/Broadway) no assessment is provided regarding existing and future capacities and flows across these chokepoints.”

The Original DEIR evaluates traffic conditions at intersections adjacent to the bridges identified in the comment. Congestion and delay associated with turning movements at these adjacent intersections is likely to be more associated with capacity constraints than the bridge segments themselves. Aside from the intersection of Cesar E Chavez Avenue & Mission Road, the signalized intersections that border the bridges identified are projected operate at acceptable levels of service, and are not anticipated to cause excessive delay for motorists over the identified bridge segments.

The Specific Plan is likely to reduce commuter demand to downtown across many of the bridges identified, because it will address the existing jobs/housing imbalance, thereby locating more housing closer to job centers in the plan area and Downtown Los Angeles. Therefore, more trips can be made by transit, biking, walking, or short car commutes, rather than longer regional trips that pass through the Project Area (but have neither an origin or a destination in the Specific Plan area).

- 40-71 The comment states, “Acquire relevant information and develop a transportation rather than a traffic assessment for the Study Area, review, assess, and mitigate transportation and transit effects rather than roadway and intersection only. Complete Streets is no substitute for Complete Mobility Provide a revised and updated information base for re-modeling the Project Area and Study Area traffic and transit movements.”

As illustrated in Figure 4-7 on page detailed on page 4-29 of the Original DEIR, a large expansion of the bike network in the Project Area is proposed, and as detailed on pages 4-46 through 4-48 of the Original DEIR, an extensive transportation demand management (TDM) plan is proposed that will encourage pedestrian, bicycle and transit mobility. Street classifications, as illustrated in Figure 2-2 on page 2-19 of the Original DEIR would provide ample sidewalks and bike lanes to encourage pedestrian and bicycle mobility. Maximum block lengths would be designated for all uses to encourage greater pedestrian and bicycle connectivity, as stated on page 2-14 of the Original DEIR. These facilities collectively would provide complete mobility within the Specific Plan area, and these project features/mitigation measures have been adequately analyzed in the DIER. Therefore, re-modeling, as specified in the comment, is not necessary.

All modes were factored into the analysis contained in the Original DEIR, including the transit network, as well as any roadway network modifications to accommodate bike lanes. No additional information is needed for the base year, and no re-modeling is needed.

- 40-72 The comment indicates that corrections to the Original DEIR text should be made, including the addition of Ave 21/Main, Marengo, and Darwin/Main, and the removal of Daly Street from the list of I-5 ramps in the study area. The comment then states, “Several items are in error and should be modified and augmented. Provide a revised, updated version and re-circulate re-circulate for meaningful review and comments. “Review all traffic counts and verify their adequacy and relevance to the traffic model. “Revise as appropriate and conduct quality controls and assurances for inputs to any model. Provide updated and verified calibration and performance runs and revised Chapter 4 as needed and supplement the Appendices and the overall DEIR.”

Daly Street is a ramp in the study area and should be referenced in the DEIR. Avenue 21/Main and Marengo ramps will be added to the description text for I-5. Darwin/Main and Ave 21/Main are the same ramp, and so Darwin/Main does not need to be added. These text corrections do not affect the traffic counts, analysis or overall conclusions in the Original DEIR; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate.

- 40-73 The comment suggests corrections to the text describing the SR 110, including indicating it should be called the Arroyo Seco Freeway, that its northerly terminus is in Pasadena not South Pasadena, that it generally provides four lanes in each direction, and notes that Amador/Solano-Casanova should be added to the ramp list in the study area. The comment then states, “Several items were in error and should be modified and augmented. Provide a revised, updated version and re-circulate for meaningful review and comments.”

The text will be modified to add the designation Pasadena Freeway/Arroyo Seco Parkway, the text will be corrected to remove the word “South” in reference to the northerly terminus of the freeway. The freeway is generally 3 lanes in each direction in the study area, so that would not be modified according to the suggestions of the comment. Amador Street and Solano Avenue/Casanova Street will be added to the list of ramps. These text corrections do not affect the traffic counts, analysis or overall conclusions in the Original DEIR; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate.

- 40-74 The comment indicates that corrections to the Original DEIR text should be made related to the description of the US 101 freeway, and following the suggested corrections states, “Several items were in error and should be modified and augmented. Provide a revised, updated version and re-circulate for meaningful review and comments.” It also states, “Pleasant Ramp is in error and is not in the Study Area; other additional ramps in/near the Study Area were not included.”

The text will be revised to indicate that US 101 runs through the southerly portion of the Study Area. US 101 terminates at I-5. The US 101 Pleasant Avenue ramps are located in the southern end of the study area, as illustrated on Figure 4-1 on page 4-4 of the Original DEIR, southeast of the US 101/I-10 merge point. In addition to the ramps listed on page 4-1 of the Original DEIR, the US 101 includes ramps that serve Broadway and Spring Street, and Mission Road. These ramps will be added to the text. These text corrections do not affect the traffic counts, analysis or overall conclusions in the Original DEIR; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate.

- 40-75 The comment states, “Classification Terms are used without comparisons of the designated street and the LACity, LACo, and/or Caltrans standards and as evidenced below with many errors for the real streets. Items were in error or contradictory and should be modified and revised.”

Roadway designations described on pages 4-1 and 4-2 of the Original DEIR are the City of Los Angeles’ current roadway designations for the Northeast Los Angeles community plan area. San Fernando Road is designated as a Secondary south of the intersection of San Fernando Road and Avenue 26, and is a Major Highway Class II north of this intersection. The Original DEIR will be revised to add this additional designation to the language describing San Fernando Road. The comparison of streets described to the standard cross section per General Plan designation is not required to be included in the Original DEIR. One of the major outcomes of the Specific Plan will be to redesignate the

roadways within the Specific Plan, so the current standards per the General Plan designations is not particularly relevant.

- 40-76 The comment states, “No information is provided regarding existing funded projects and plans related to what the CASP provides and those planned by LADoT/LADPW. Provide a revised, updated version and re-circulate for meaningful review and comments.”

The Proposed Alternative’s travel demand model includes programmed transportation improvements in the study area and beyond, consistent with the SCAG RTP model, so future transportation improvements are taken into account in the analysis. These text corrections do not affect the traffic counts, analysis or overall conclusions in the Original DEIR; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate.

- 40-77 The comment notes that North Figueroa Street is a Major Class II and that parking is generally allowed along most of North Figueroa. No comment is needed.

- 40-78 The comment states that figures and discussions of street descriptions for North Figueroa, North Broadway, and North Spring Street are contradictory, with some items related to parking restrictions and number of lanes in error. The comment notes that San Fernando Road is a Class II highway and is not included in the street descriptions table.

The discussion on page 4-1 of the Original DEIR is correct for North Figueroa. North Broadway has peak period parking restrictions westbound during the AM peak period, and eastbound during the PM peak period, which will be noted in the revised street description text. Parking is generally prohibited on the west side of North Spring Street, and is allowed along portions of the east side of North Spring Street, except during the PM peak period, when parking is prohibited. The Original DEIR text will be revised to reflect this information. See Response 40-75 related to San Fernando Road’s designation as a Class II highway. Peak hour parking restrictions were properly coded into the CASP travel demand model, and so are reflected in the analysis. Thus, these text corrections do not affect the traffic counts, analysis or overall conclusions in the Original DEIR; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate.

- 40-79 The comment states: “Parking is variable along Main west of the LA River and prohibited along Daly-Lamar due to heavy truck traffic from Lamar. No discussion is provided regarding the truck traffic from UPS and Mission Yard. Items were in error or contradictory and should be modified and revised. Provide a revised, updated version and re-circulate for meaningful review and comments.”

The text will be revised to indicate that parking along North Main Street is variable, with parking allowed along many sections of North Main Street, with peak period parking restrictions implemented in some locations. The peak period parking restrictions along North Main Street do not affect overall roadway capacity because they do not result in an additional travel lane. North Main Street operates primarily as a two lane roadway in each direction during both peak and off-peak periods. See Response 40-64 regarding

truck traffic. These text corrections do not affect the traffic counts, analysis or overall conclusions in the Original DEIR; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate.

- 40-80 The comment states in reference to San Fernando Road, “Parking is variable along the easterly side and prohibited along much of the west side. No discussion is provided regarding the proposed DPW widening project. items were in error or contradictory and should be modified and revised. Provide a revised, updated version and re-circulate for meaningful review and comments.”

The Original DEIR text will be revised to state that parking is variable on San Fernando Road. The purpose of the section of the Original DEIR referred to in the comment is to describe existing conditions. Future roadway improvements are not discussed in this section. These text corrections do not affect the traffic counts, analysis or overall conclusions in the Original DEIR; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate.

- 40-81 The comment states, “Parking has the same commute limitations as on Broadway; both are in error: Broadway is four-lanes and Ave. 26 is two-lanes, except when under parking restrictions. Provide a revised, updated version and re-circulate for meaningful review and comments.”

The Original DEIR text will be revised to state that parking is generally allowed on Avenue 26, except for certain sections, where parking is prohibited during peak periods. During off-peak periods, Avenue 26 operates as one lane in a particular direction in some locations, and two lanes in others. During peak periods, it operates as two lanes in each direction within the Study Area. See Response 40-78 in reference to Broadway. These text corrections do not affect the traffic counts, analysis or overall conclusions in the Original DEIR; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate.

- 40-82 In reference to Pasadena Ave, the comment states, “Parking has the same commute and permanent limitations as others streets; Daly south of Main has generally “No Stopping Zones” as does Pasadena has along both east and west of I-5..Provide a revised, updated version and re-circulate for meaningful review and comments.”

The description of Pasadena Avenue on page 4-2 of the Original DEIR is correct, and does not need to be changed. Pasadena Avenue does not have peak period parking restrictions within the Study Area. The Original DEIR states that parking is “generally allowed along most of Pasadena Avenue.” Every street with on-street parking typically has some locations where there are red curb, no-stopping zones, etc. The purpose of the street description is to provide a general assessment of the characteristics of the street. It is not intended to be an exhaustive documentation of every variation to the general character of a street. As noted in the comment, Daly Street prohibits parking from Mission Road to just south of Main Street. The Original DEIR will be updated to include this information. These text corrections do not affect the traffic counts, analysis or

overall conclusions in the Original DEIR; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate.

40-83 The comment states, “The entire DEIR does not use consistent designations: North, South, East, and West for all streets and intersections and does not appear to have a consistent naming hierarchy for Ave. 26, Daly, Pasadena, etc..Provide a single simple standard set of terms throughout and a revise, update version and re-circulate for meaningful review and comments.” Certain street names have been revised, see Section 4 Corrections and Additions.

40-84 The comment states that items 29 and 30 on page 4-3 are incorrectly located on figure 4-1. The locations of the intersections on figure 4-1 are correct, the text will be corrected to correspond correctly with the placement. See section 4 Corrections and Additions.

40-85 The comment states that intersection geometry for Avenue 20 for study intersection 30 is wrong.

Appendix 4A will be revised to indicate that the northbound movement on Avenue 21 is a shared left/right lane, not a shared left-through-right lane. This change would not affect the analysis or conclusions in the Original DEIR.

40-86 The comment states, “The entire Chapter 4 does not consider the issue of mixed modes (HDTs, buses and light vehicles); this is of special concerns with Main/Daly and Daly/Mission and the Mission on-ramps for I-5 just west of Daly/Mission IS. Similar conditions occur at the Ave. Provide a revised, updated version including thorough analyses of truck movements and their effects on general traffic flows, re-run models, and re-circulate for meaningful review and comments.”

See Response 40-64.

40-87 The comment states, “This IS forms an easterly part of a compound IS with Alameda, Alhambra (400ft long), Main, and Ord. Alhambra Ave (<200ft) forms a north-bound left-turn slip lane for Main access and feeds into the South-bound Alameda traffic from Main. As a compound IS traffic signals at Alpine (north) and Main (south) effectively protect LT from South-Bound Alhambra onto Alameda.

“Turning analyses do not reflect the compound intersection movements as is the case with IS37 and others. Alhambra is an important PM commute slip lane. Provide a revised, updated version and re-circulate for meaningful review and comments.

The intersection of North Alameda Street & Alhambra Avenue is located approximately 400’ from the intersection of North Alameda Street & North Main Street/Ord Street, and so functions independently. The intersections are spaced too far apart to be considered compound intersections. The intersection of North Alameda Street & North Main Street/Bauchet Street is located approximately 180’ from the North Alameda Street & North Main Street/Ord Street, and so functions independently. These intersections are also spaced too far apart to be considered compound intersections. Study intersections were selected in coordination with LADOT, who determined that the study intersections

were an adequate Study Area in which to assess the potential for Project impacts. Revisions, updated, and recirculation, as suggested in the comment, are therefore not necessary.

- 40-88 In reference to the intersection of Mission Road and Valley Boulevard comment states, “This entire intersection has not been counted or described adequately and completely and has been modeled on only partial values for the overall intersection. Traffic flows through this intersection forms the initial pass-through flows for all of Main Street from Mission to Alameda. Incorrect input counts may distort all subsequent values and alter future forecasted values for Mission Road and major cross streets (Daly, Griffin, and Main). Provide a revised info base for the entire intersection, update “existing” conditions and re-model future with and without Project conditions and transportation assessment for the Mission, Main (to Alameda), and southerly Daly (Broadway to Mission) segments. A new DEIR Chapter version is required and recirculated for meaningful review and comments.” The comment details specific information related to intersection geometry and traffic counts to justify the conclusions quoted in this paragraph.

Intersections were determined in conjunction with LADOT, and it was determined that the Study Area was adequate for analyzing the CASP project. Intersection 37 is on the far edge of the Study Area, so it was determined that analyzing all of the adjacent intersections near Intersection 37 would not be needed. Traffic counts collected at this intersection were correct and adequate, and appropriately used to model this location. The alignment of the intersection in relation to true north is inconsequential to the analysis. All legs of the intersection are on an angle. The analysis assumed Valley Boulevard as the east-west leg of the intersection, and Mission Road as the north-south leg of the intersection, as those are the primary orientations of both roadways beyond the intersection. Revisions, updated, and recirculation, as suggested in the comment, are therefore not necessary.

- 40-89 The comment states, “Provide a revised, updated version of all street designations between listings, text, and figures on maps/figures and re-circulate for meaningful review and comments...Provide a revised, updated version of all related intersection maps/figures and re-circulate for meaningful review and comments.”

Corrections to figures and text will be incorporated into the FEIR, as detailed in response to comments. Text/figure corrections do not affect the traffic counts, analysis, or overall conclusions in the Original DEIR; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate. See section 4 Corrections and Additions for revisions.

- 40-90 The comment states in reference to Figure 4-2, “6 Lanes on BroadwayXGates-Ave.18 and in Chinatown BoardwayXAlpine-College 4 lanes on Ave.26 (Pasadena-Lacy), Pasadena (Ave.26-Broadway), and San Fernando (Ave. 19-Pasadena). These depictions are incorrect but are used in modeling the forecasted values. Provide a revised, updated version and re-circulate for meaningful review and comments.”

The proper number of lanes on the roadways indicated in the comment were modeled in the analysis, and so the analysis does not need correction. The analysis in the Original

DEIR is a peak period analysis and reflects the additional lanes made available by peak period parking restrictions. The overall conclusions in the Original DEIR are appropriate; therefore, it is not necessary to re-circulate because the analysis is relevant and adequate.

- 40-91 The comment states in reference to Figure 4-3C, “The individual and general illustrations for Intersection 37, Valley-Main and Mission Road demonstrate that the counts and forecasted values are not adequate descriptions of the actual intersection; the number 37 is located on the EastBound.

“Provide a revised, updated version and re-circulate for meaningful review and comments.”

See Response 40-88.

- 40-92 The comment states, “As the presented intersection geometries are incorrect, inadequate, and incomplete, all related analyses, forecasts, and assessments must be considered similarly.

“Provide a revised, updated version and re-circulate for meaningful review and comments.”

See Responses 40-100 and 27a-4 for intersection geometries that need to be corrected. No other inconsistencies in the geometries were identified. The comments related to geometries contained in the comment letter identified text and figures that need to be corrected. However, the analysis was determined to be correct for those facilities noted by the comment. Therefore, the overall conclusions in the Original DEIR are appropriate, and it is not necessary to re-circulate because the analysis is relevant and adequate.

- 40-93 The comment states, “Intersections 4, 5, 8, and 9 on Ave.26 and 29, 30, 31, and 35 on Main and Daly include very large flows of HDTrucks (of 5-axle with trailers of up to 53ft) requiring very different intersection analyses compared to those dominated by LightDutyTrucks and vehicles. As the presented intersection geometries and movements are incorrect, inadequate, and incomplete, all related analyses, forecasts, and assessments must be considered similarly. Provide a revised, updated version and re-circulate for meaningful review and comments.”

See Response 40-64 related to truck traffic, and 40-92 related to intersection geometries.

- 40-94 The comment states, “With the numerous errors and inconsistencies any assignment of many IS-LOS are in error and must be considered as incorrect, and thereby incomplete and inadequate. All intersection geometries, counts, and modeled results must be reviewed and confirmed before re-assessment of the entire traffic and transportation impacts and mitigations can be verified and certified.

“Provide a revised, updated version and re-circulate for meaningful review and comments.”

See Response 40-92.

40-95 The comment states, “LOS scale is qualitative but A-E are based on quantitative parameters, therefore only designation of LOS F may be considered as ‘qualitative’ and arbitrary unless based on additional quantification as often done with freeways.

“No definition of ‘severe’ vs mild congestion is provided and presumes that all LOS F has delays and stop and go conditions which have not been verified or references provided. Some LOS F may have delays, may have stop-n-go, and may have ‘congestion’ but the only true definition is that the flow of traffic by counts equals the estimated capacity without regard to modal mixes number of lanes and number and sequencing of signals.

“As indicated elsewhere use of LOS F does not encompass the full range of congestion where LOS A-E are less than 100% capacity while conditions in LOS F can represent the total range from 100% to 200+%.

“A full range of quantitative designations can be constructed especially for the Los Angeles area which has more LOS F than any other 1M+ cities in the US. Provide a revised, updated version and re-circulate for meaningful review and comments.”

The Original DEIR conducted the LOS analysis consistent with the methodologies and LOS parameters as required by the City of Los Angeles. The City of Los Angeles does not differentiate between categories of LOS F. The City of Los Angeles’ strictest traffic impact threshold (a 0.01 V/C increase) applies when an intersection operates at LOS F, regardless of V/C. Therefore, there would be no difference in the conclusions of the Original DEIR, and its determination of impact significance if additional categories of LOS F were adopted by the City.

40-96 The comment states, “These statement and accompanying table and qualitative descriptions do not truly reflect the conditions found with the Study Area. From Main/Lamar east to Daly and south to Mission and west onto Mission or to the on-ramps of the I-10/I-5 includes an unmeasured/uncounted modal mix of HD Trucks, buses, and other slow moving vehicles with wide turning arcs and greatly change the levels of services through the Main, Daly, and Mission streets. Similarly the entire Transportation assessment does not recognize the existence of trucks and buses with relationship to their turning requirements and the truck ban on the SR110 which requires trucks to use Ave 26 off-ramp to access Figueroa and San Fernando Road for passage and deliveries. The affected intersection thus may appear to be LOS A-E based on axle counts when in fact if time measured the IS may be having a lower LOS. Provide a revised, updated version and re-circulate for meaningful review and comments...Several unsignalized intersections are adversely affected by trucks and buses and resulting tail-backups from nearby signalized intersections and railroad crossings. Without a thorough assessment of trucks and buses for the Study Area all calculations for LOS must be considered as inadequate and incomplete”

See Response 40-64.

40-97 The comment states, “With the numerous errors and inconsistencies any assignment of many IS-LOS are in error and must be considered as incorrect, and thereby incomplete and inadequate. As the presented intersection geometries are incorrect, inadequate, and incomplete, all related analyses, forecasts, and assessments must be considered similarly.”

See Response 40-92.

40-98 The comment states, “With the numerous errors and inconsistencies any assignment of many IS-LOS are in error and must be considered as incorrect, and thereby incomplete and inadequate. All intersection geometries, counts, and modeled results must be reviewed and confirmed before re-assessment of the entire traffic and transportation impacts and mitigations can be verified and certified.

“As the presented intersection geometries and counter locations are incorrect, inadequate, and incomplete, all related analyses, forecasts, and assessments must be considered similarly.

“Provide a revised, updated version and re-circulate for meaningful review and comments.”

See Response 40-92.

40-99 The comment is a duplicate of Comment 40-98. See Response 40-98.

40-100 The comment states, “Appendix 4A Traffic Data provides the basis for the entire assessment and EIR Chapter 4. Review of Intersections (IS) 1 and 2 provide the clear inadequacy of the Transportation and Traffic assessment. Simply, IS 1 is oriented properly to the North Arrow provided and the Chapter 4 illustrations and numbers are consistent with those in the Appendix 4A, while those for IS 2 are not consistent with those of IS 1 in both the Chapter 4 and Appendix 4A. Other intersections are also subject to errors and inconsistencies. The basic traffic count data for IS 1 and IS 2 are inconsistent in the Appendix, and Appendix information is not consistent with the Chapter 4 summaries. We must assume that the Quality Control systems for the entire traffic counts, analyses, and modeling of existing and future conditions cannot be assumed to be accurate, complete, or adequate. AM IS 1 traffic flows are consistent with the commuter patterns and the intersection’s three-sided geometry. AM IS 2 with three-sided geometry, however, appears to have reversed/mirrored geometry with left turns (rather than right) from San Fernando Road into the MetroLink Yard rather than along the San Fernando Road (=Ave. 20 to Broadway). AM In-Bound commute flows from IS1 to IS2 and IS 12 are consistent with the largest values (>1000 vph) but the IS geometries are not consistent with figures in Chapter 4 and Appendix 4A.

As the presented intersection traffic may be incorrect, inadequate, and incomplete, all related analyses, forecasts, and assessments must be considered similarly. Provide a revised, updated version and re-circulate for meaningful review and comments.

The orientation of the count sheet for Intersection 2 is incorrect. The firm that collected the count data was contacted during the preparation of the Original DEIR, and the

movements were re-mapped according to their proper orientation. The orientation of the turning movement volumes in Figure 4-3 is correct. The lane configurations figure in Appendix 4A is correct, and is consistent with Figure 4-3. However, the labeling of streets in the lane configurations figure for Intersection 2 should be revised. The east leg of the intersection, as oriented in the figure, should read N San Fernando Road (as well as the south leg). The west leg of the intersection, as oriented in the figure, should read North Avenue 19. Because Intersection 2 is skewed in its orientation, it is customary to adjust the orientation of the intersection to match the cardinal four directions in the graphics, and analysis. The intersection is properly analyzed, and is consistent between the properly oriented traffic counts as illustrated in Figure 4-3, the lane configurations, and the level of service worksheets, with the exception of the Existing AM and PM peak hour analysis, which is revised and shown below. The comment uses the orientation of Intersection 1 as a comparison to Intersection 2, but does not indicate any specific inconsistencies or issues with the data and analysis for Intersection 1. The comment also notes “other intersections are subject to errors and inconsistencies,” but does not specify what those potential errors and inconsistencies might be, so it is unclear what, if any response, is needed to that particular statement in the comment.

Aside from the revised Existing Conditions analysis included in this response, no other issues or errors were identified. The revised analysis does not affect the overall conclusions of the Original DEIR, and therefore, it is determined that the Original DEIR analysis is adequate and complete, and does not require recirculation.

Int.	Existing Conditions			
	AM Peak Hour		PM Peak Hour	
	V/C	LOS	V/C	LOS
2	1.059	F	0.311	A

40-101 The comment is a duplicate of Comment 40-98. See Response 40-98.

40-102 The comment is a duplicate of Comment 40-98. See Response 40-98.

40-103 The comment lists study intersections, and includes question marks, bold, and underlining, and states “Provide a revised, updated version and re-circulate for meaningful review and comments.”

The meaning of the bold, underline, and question marks in the comment is not understood, , nonetheless revisions to the text in the referenced section have been made in order to maintain consistency with other revised sections. See section 4 Corrections and Additions.

40-104 The comment states, “Simple listing of transit line numbers does not provide assessment for the Transportation Chapter, nor the impacts of land use and transportation interfaces – routes are not indicated, turnings are not identified (e.g., Marengo/Daly/Mission intersection), and no coordination of existing and future bus stops and stations are provided. No discussion is provided as to the effects of Park-N-Ride facilities for San

Fernando Road, Ave. 26, Figueroa, Pasadena, Broadway, Main, and Mission. The text states that this is only for the “Project Area” rather than the “Study Area” which if included would double the numbered bus lines plus USC buses, Chapter 4 - Study Area includes - MTA 70, 71, 78, 79, 251, 252, 378, 605, 620, 751, and many others if counting the many bus lines SW of the Project Area. Since the Proposed Alternative is considered as “pedestrian-friendly”, rail and road transit are most important as to how commuters will get downtown and whether they may or may not impact the Project Study Area depends on how many are on buses. This and related sections are totally inadequate and incomplete. Provide a revised, updated version and re-circulate for meaningful review and comments.”

See Response 40-58.

40-105 The comment states, “No Bikeways are indicated in plan and how they related to the Study Area and Pass-Through traffic, and assessments of LOS, turnings, and must be considered similarly. Provide a revised, updated version and re-circulate for meaningful review and comments.”

Bikeways planned as part of the Specific Plan are illustrated in Figure 4-7 on page 4-29 of the Original DEIR. Traffic volumes, turning movements, and the LOS analysis all include the effects of the Bikeways; therefore, no revisions or updates to the analysis are needed.

40-106 The comment states, “No discussion is provided regarding the all components of “Complete Streets” and without assessment as to achievement of complete streets, the incomplete streets of the Project and Study Areas and the assessment of the Original DEIR should be considered as incomplete and inadequate. As a City policy, “Complete Streets” must be considered for the “Standards of Significance” for transportation impacts for all components including pedestrian, cycling, transits, and motorist. Provide a revised, updated version and re-circulate for meaningful review and comments.”

See Response 40-71.

40-107 The comment states, “As no existing or planned transit operations or facilities are provided, analyzed, or assessed, assessment of disruption or interference cannot be considered and therefore such is incomplete and inadequate. No discussion is provided regarding the transit components of “Complete Streets” and without assessment as to achievement of complete street, the incomplete streets of the Project and Study Areas and the Original DEIR should be considered as incomplete and inadequate. Provide a revised, updated version and re-circulate for meaningful review and comments.”

See Response 40-58.

40-108 In reference to the bicycle/pedestrian system, the comment states, “As no existing or planned operations or facilities are provided, analyzed, or assessed, assessment of

disruption or interference cannot be considered and therefore such is incomplete and inadequate. No discussion is provided regarding the bicycling components of “Complete Streets” and without assessment as to achievement of complete street, the incomplete streets of the Project and Study Areas and the Original DEIR should be considered as incomplete and inadequate. Provide a revised, updated version and re-circulate for meaningful review and comments.

See Response 40-71.

40-109 The comment is a duplicate of Comment 40-98. See Response 40-98.

40-110 The comment states, “As many unsignalized intersections lie within the study area, a simple quantitative – time – could be used to assess significance. Since analyses are conducted before signalization, such analyses would be the expected basis.”

The City of Los Angeles does not consider delay at unsignalized intersections to be a relevant factor for determining the significance of impacts. The analysis of unsignalized intersections in Chapter 4 of the Original DEIR was provided for informational purposes, and to assist the City in determining which intersections may be appropriate for signalization as the buildout of the Specific Plan progresses.

40-111 The comment is a duplicate of Comment 40-98. See Response 40-98.

40-112 In reference to the CMP analysis, the comment states, “No provisions or even listing of “select” regional facilities is provided, Without identification, the entire subsection is incorrect, inadequate, and incomplete, all related analyses, forecasts, and assessments must be considered similarly.

Provide a revised, updated version and re-circulate for meaningful review and comments.”

There are no CMP arterial monitoring stations near the Specific Plan area. CMP freeway monitoring locations are listed in Appendix 4D. The CMP analysis of roadway monitoring locations is consistent with the CMP, and adequately evaluates the potential for Project impacts to the CMP roadway facilities.

40-113 The comment states, “No assumptions are provided for the analysis of potential (2035) transportation impacts. Critical assumptions regarding transit ridership is pivotal to impacts of motorist traffic. All potential traffic impacts can be mitigated by appropriate diversion of motorists to transit systems. Provisions of Park-N-Ride systems for Huntington, Valley, Figueroa, Eagle Rock Blvd., and San Fernando Road corridors could easily relieve much of the commuter/pass-through congestion on Mission, Main, Broadway, Figueroa, and San Fernando Road and provide the opportunities for real Complete Streets in the Project Area. As the presented, potential impacts are based on incorrect, inadequate, and incomplete traffic counts and all related analyses, forecasts, and assessments must be considered similarly. Provide a revised, updated version and re-circulate for meaningful review and comments.”

The analysis of potential 2035 transportation impacts used the CASP model. The CASP future year model includes transportation improvements (transit and roadway) in the transportation network. Thus, transit ridership potential is accounted for in the mode choice model and in the assessment of future traffic conditions as documented in Chapter 4 of the Original DEIR. The comment suggests providing park and ride systems on several corridors outside the Specific Plan Area. The Specific Plan cannot designate the location of improvements outside of the Specific Plan area. Park and ride systems are typically only provided for rail transit lines, or express bus lines. Park and ride is provided in the Project Area at the Lincoln/Cypress station, as well as at several stations along the Metro Gold Line outside the study area. The corridors mentioned in the comment are primarily served by local bus, so would not be appropriate lines for constructing park and ride facilities, as demand for such facilities would not warrant an exclusive parking lot. The Specific Plan is intended to address the transportation needs of the Specific Plan, and is not a venue to address regional transit needs. Complete streets requires the provision of facilities such as bike lanes and pedestrian amenities, which as described in Chapter 2 of the Original DEIR, is a key objective of the Specific Plan.

40-114 The comment is a duplicate of Comment 40-98. See Response 40-98.

40-115 The comment is a duplicate of Comment 40-113. See Response 40-113.

40-116 The comment is a duplicate of Comment 40-98. See Response 40-98.

40-117 The comment states, “All regional TAZ are based on 2000 census information, and thereby disaggregation of outdated values generates outdated local TAZ for modeling based on 2009 adjusted traffic.”

The regional TAZs are based on the 2008 SCAG RTP model, which includes 2000 Census, as well as other data, to accurately assess the base year. As detailed in Appendix 4C of the Original DEIR, an extensive process to calibrate and validate the model to the 2009 traffic counts was conducted. As detailed in Appendix 4C, the CASP model passed all validation tests as required by Caltrans guidelines, and is deemed appropriate and accurate for analysis of the Specific Plan Project.

40-118 The comment is a duplicate of Comment 40-98. See Response 40-98.

40-119 The comment is a duplicate of Comment 40-98. See Response 40-98.

40-120 The comment is a duplicate of Comment 40-98. See Response 40-98.

40-121 The comment states, “Model development and related forecasts of 2035 cannot be correct, adequate, and complete when based on models adjusted for inaccurate counts and erroneous geometries which would affect developments and resulting assessments. The three critical major corridors as currently reviewed – Mission, Main, and San Fernando Road would be in error and thereby traffic flows at all related intersections may be

incorrect and incomplete. Provide a revised, updated version and re-circulate for meaningful review and comments.”

The CASP travel demand model outputs were post-processed using the traffic counts (in accordance with state of the practice guidelines) collected at all of the study intersections. These counts were collected as part of the data collection effort for this project, and reflect all of the correct lane geometries, peak period parking restrictions, etc., in place when the counts were collected. Intersection geometries used in the LOS analysis do not affect the model post-processing output or the forecast of traffic volumes. The correct number of lanes, reflecting peak period parking restrictions were modeled, and so the forecast traffic volumes are acceptable. The model post-processing approach for turning movement volumes is a static process, conducted at each individual study intersection, and so does not affect traffic flows at all intersections. Because segment capacities were properly modeled, the analysis contained in the Original DEIR is adequate and complete. Corrections to lane geometries at individual intersections are noted in the response to comment 27a-4. While these corrections affect the LOS analysis, they do not affect the modeled volumes or overall conclusions of the Original DEIR; therefore, recirculation is not necessary.

40-122 The comment notes that the phrase “existing” should reference 2011 not 2009.

CEQA requires that the establishment of the base year for analysis be determined at the time of the NOP. The first scoping meeting was conducted March 6, 2009, thereby establishing 2009 as the base year for evaluation of transportation existing conditions. It is typical for EIRs to use existing conditions to refer to the base year.

40-123 The comment states, “This Scenario H definition contains contradictory elements compared to other transportation “Existing Conditions” descriptive texts and illustrations. Broadway west of LA River has the same commuter traffic parking prohibitions as those east of LA River and thereby should have the same “six-lane” designations for both segments. Similarly, existing Ave. 26 south of Metro Line and Pasadena have commuter parking prohibitions equivalent to 2+1 lanes for both AM and PM commutes; these lanes and parking conditions remain as-is. College at the SW end of the Project Area is shown to lie within the Project Area and, therefore, would be downsized from four to two travel lanes.

“Errors and inconsistency appear to arise in the Scenarios and the Proposed Alternative (Scenario H) which may result in impacts which have not been adequate or completed provided in the assessment.

“No assessment of street changes and parking effects has been provided (total parking provided under existing and Proposed Project and No Project Alternatives based on Scenario H).

North Broadway west of the Los Angeles River does have peak period parking restrictions that are consistent with the peak period parking restrictions east of the Los Angeles River. However, the parking restrictions do not allow North Broadway to pick

up an additional travel lane. Rather, the peak period parking restrictions reduce friction associated with the on-street parking. Therefore, the description on page 4-19 of the Original DEIR, as well as Figure 4-6 on page 4-24 of the Original DEIR are accurate in relation to Broadway. Under Scenario H, the peak period parking restrictions on Avenue 26 would be removed between Pasadena Avenue and the Lincoln Heights/Cypress Park Metro Gold Line Station to accommodate bike lanes, as shown in Figures 4.6 (page 4-24) and 4.7 (page 4-29). The text on page 4-19 will be revised to call out this change to Avenue 26. This change was included in the modeling of Scenario H, so the results in the Original DEIR adequately analyze the potential impacts of the Project. Scenario B reads in part: “All Project Roadways as two-lane facilities...,” which includes the conversion of College Street to a two-lane roadway. This was also included in the modeling of Scenario H so the results in the Original DEIR adequately analyze the potential impacts of the Project. See Response 40-34 related to parking effects.

40-124 The comment states, “The pass-through analyses depends on inadequate traffic information and incorrect counting of major starting points for analyses. Major pass-through corridors (e.g., San Fernando Road, Figueroa, Pasadena, and Broadway) do not include any counting points outside of Project Area (or Study Area), and therefore no reliable and adequate assessment can be undertaken as to external contributions to the locally generated additions to the “pass-through” commuters.

As the “pass-through” corridors include major bus routes into and through the Project Area, no comparisons can be made regarding the VMT and commuter elements within the gross-pass-through, rather than that of light duty vehicles. As indicated in other sections/comments, the pass-through traffic for Valley-Main and Mission has not been adequately and completely counted and modeled. Provide at least one additional count of each major pass-through corridor either at the City boundary or at the boundary of Project Area or at least 2000ft beyond the current counting points. Provide adequate and complete counting of the Valley-Main/Mission/Marengo. Review, revise, and augment model inputs and comparisons and re-circulate the Original DEIR.

Pass through traffic was accurately analyzed using the travel demand model developed for the CASP. In addition to the project generated traffic, the CASP model accounts for the background traffic that passes through the study area and thus was included in the volumes used in the level of service analysis. A detailed calibration and validation exercise was undertaken to adequately assess the flows into and out of the study area, and the model was deemed appropriate for forecasting future travel conditions for the Specific Plan.

As the model was developed according to industry standards and state of the practice guidelines, the analysis contained in the Original DEIR is adequate and complete; therefore, revisions to the model inputs are not required and recirculation is not necessary.

40-125 The comment states, “The Complete Street approach should reflect the pedestrian, cycling, and transit components in addition to those for road traffic. The Original DEIR provides no such background, modeling, assessment, or mitigations including the other

components of the Complete Street (should be Complete Mobility). Provide description as to the “larger complete street objectives” and the “Complete Street Standards” of the CASPlan which have not been provided anywhere in the Chapter.”

See Response 40-71.

40-126 The comment is a partial duplicate of Comment 40-127. See Response 40-127.

40-127 The comment states, “The Complete Street approach should reflect the pedestrian, cycling, and transit components in addition to those for road traffic. The Original DEIR provides no such background, modeling, assessment, or mitigations including the other components of the Complete Street (should be Complete Mobility). Provide description as to the “larger complete street objectives” and the ‘Complete Street Standards’ of the CASPlan which have not been provided anywhere in the Chapter... Given the lack of background analyses, and assessment the “86%” solution cannot be justified nor verified. As a ‘pedestrian oriented’ development, transit ridership of >50% for the Proposed Project should be achieved which would be expected to greatly improve the LOS of all arterials/roadways in the Study Area. The Chapter 4 does not consider the effects and mitigation required for a successful ‘pedestrian oriented’ project, e.g., dispersion of more automobile traffic from freeways to arterials and traffic management measures required to less this dispersion (e.g., congestion and/or destination pricing). “Provide description as to the ‘larger complete street objectives’ and the ‘Complete Street Standards’ of the CASPlan which have not been provided anywhere in the Chapter.

See Response 40-58 related to the analysis of transit lines. As illustrated in Figure 4-7 on page detailed on page 4-29 of the Original DEIR, a large expansion of the bike network in the Project Area is proposed, and as detailed on pages 4-46 through 4-48 of the Original DEIR, an extensive transportation demand management (TDM) plan is proposed that will encourage pedestrian, bicycle and transit mobility. Street classifications, as illustrated in Figure 2-2 on page 2-19 of the Original DEIR would provide ample sidewalks, and bike lanes to encourage pedestrian and bicycle mobility. Maximum block lengths would be designated for all uses to encourage greater pedestrian and bicycle connectivity, as stated on page 2-14 of the Original DEIR. These facilities collectively would provide complete mobility within the Specific Plan area, and these project features/mitigation measures have been adequately analyzed in the Original DEIR.

A transit mode split of greater than 50% is a very aggressive goal that would be very difficult to achieve. New York City, which has the highest transit ridership in the United States, has a 53% transit mode split for commute trips (2000 US Census Journey to Work data), so it would be unlikely for the CASP to reach New York City levels of transit ridership. However, the CASP will implement a series of TDM measures, street modifications and strategies aimed at encouraging the use of active transportation modes, including transit. The transportation analysis contained within the CASP EIR is consistent with City of Los Angeles policies and guidelines.

40-128 The comment quotes text from the Original DEIR. The purpose of the quote is not stated, so the comment is not understood.

40-129 The comment underlined and bolded selections of text from the Original DEIR. The meaning of the underlined and bolded text has not been stated, and so the comment is not understood.

40-130 The comment underlined and bolded selections of text from the Original DEIR. The meaning of the underlined and bolded text is not entirely clear, however certain changes to the text within the referenced section have been made to remain consistent with other revisions. See section 4 Corrections and Additions.

40-131 The comment states, “DEIR is plagued with errors and inconsistencies and therefore is inadequate if not also incomplete. Inconsistent usage may have given rise to Error- North Spring or Spring and repeated in separate paragraphs of same section but don’t know which way the error – nine intersections to be signalized or eight.”

The Original DEIR will be revised to ensure consistent use of street naming. As detailed on page 4-48 of the Original DEIR, five unsignalized intersections are proposed for signalization as part of improvements related to the CASP. As detailed on page 4-49 of the Original DEIR, an additional four unsignalized intersections are already programmed for the installation of traffic signals independent of the CASP. Thus, a total of nine unsignalized intersections are already programmed to have traffic signals installed, or are proposed to have signals associated with the CASP. The text in the Original DEIR is correct and does not need to be revised. See section 4 Corrections and Additions for street name revisions.

40-132 The comment implies that the DEIR has not provided sufficient information regarding liquefaction nor provided sufficient information regarding the soil’s capacity for increased recharge. The comment though fails to provide any additional information that would lead the DEIR to render an alternative conclusion. The DEIR does identify liquefaction as a significant impact and has applied mitigation language to address existing soil conditions. (See MMP Chapter 4).

40-133 The comment restates information about river deposits and makes claims that the older alluvium deposits are also located on the west side of the river. The comment provides no facts as to how this information would have a significant environmental impact beyond the impacts disclosed in this chapter.

40-134 The comment states that no references are provided in Appendix 6. The references for the citations in Appendix 6 are included with the references for Chapter 6.

40-135 The comment claims that the description that “the historic high groundwater level in the vicinity of the site is reported to be at a depth of approximately 20’ below the ground surface” is inadequate but doesn’t provide facts, reasonable assumptions based on facts, or expert opinion supported by facts attesting to the inadequacy of the definition.

40-136 The comment states that the Original DEIR Chapter 6 needs to be recirculated based on potential impacts as a result of developing in a liquefaction area. However, Mitigation

Measure Earth Resources 2 requires that future applicants provide a geotechnical report to include building design considerations, and shall comply with relevant building codes and Department of Building and Safety standards. The EIR is a programmatic document and there are no specific development projects proposed at this time that could provide the level of detail requested by the comment. In addition, the comment provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the inadequacy of the mitigation.

40-137 The comment states that the Original DEIR did not provide readily available DOGGR database. This EIR has been revised to include update on the locations of oil and gas wells. See Corrections and Additions for the revised text to 10.1.2.1B and Figure 10-6 in the Chapter 10, Hazardous Materials.

40-138 The comment states that the Original DEIR did not provide information as to the well location and assessment of their potential for redevelopment in light of new technologies. See Response to Comment 40-137 in regards to well location. The Project Area is not located in an Oil Drilling or Surface Mining Supplemental Use District²², nor does any of the Project Area appear to be in an existing Oil Field and Oil Drilling Area.²³ Therefore, potential to develop future oil resources would not be an impact in the Project Area.

40-139 The comment states that the Original DEIR Chapter 6, 7 and 10 needs to be recirculated based on geologic context but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the inadequacy of the analysis.

40-140 The comment states that the Original DEIR Chapter 6, 7 and 10 needs to be recirculated based on potential exposure of new residential development to liquefaction, ground methane constraints but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the inadequacy of the analysis. Sections of the Hazardous Material Chapter have been revised to include expanded discussion of potential impacts as a result of methane gases and Mitigation Measure Hazardous Materials 8 has been added to reduce impacts to below the level of significance. See Response to Comment 27-101 on revised discussion on methane zone. See Corrections and Additions for revisions to Page 10-20, section 10.3.2.1 of the Original DEIR. See Response to Comment 40-136 regarding liquefaction impacts.

40-141 The comment states that the Original DEIR the discussion of restoring oil wells or drilling new wells was not supported by reference and the City lacks jurisdiction over the control of drilling. See Response to Comment 27-100 regarding revised analysis of oil and gas wells. Mitigation Measure Hazardous Materials 10 has been added to address well abandonment procedures and project development. The City regulates the production of oil through the processes and requirements of the LAMC Section 13.01, Oil Drilling Districts.

²² City of Los Angeles Department of City Planning, Systems and Mapping Division, GIS Section March 25, 1993

²³ City of Los Angeles Department of City Planning, General Plan Framework Section, Citywide Graphics, May 1994

- 40-142 See Response to Comment 27-101 on revised discussion on methane zone. See Corrections and Additions for revisions to Page 10-20, section 10.3.2.1 of the Original DEIR.
- 40-143 See Response to Comment 27-100 regarding revised analysis of oil and gas wells. See Response to Comment 27-101 on revised discussion on methane zone. See Corrections and Additions for additional information on oil wells. See Corrections and Additions for revisions to Page 10-20, section 10.3.2.1 of the Original DEIR.
- 40-144 See Response to Comment 40-136 regarding mitigation of liquefaction impacts and the discussion of the constraints of a programmatic evaluation.
- 40-145 See Response to Comment 27-101 regarding methane zone and methane zone data.
- 40-146 The comment appears to indicate a general concern with a lack of references but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the inadequacy of the analysis. See Response to Comment 27-100 regarding revised analysis of oil and gas wells. See Corrections and Additions for additional information on oil wells. See Corrections and Additions for revisions to Page 10-20, section 10.3.2.1 of the Original DEIR.
- 40-147 The comment appears to indicate a general concern with a lack of proper references and citation but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the inadequacy of the analysis.
- 40-148 Appendix 6A of the Original DEIR based the conclusion of less than significant impacts due to subsidence on lack of historic precedent that subsidence is an issue of concern. The comment provides no facts, reasonable assumption based on facts, or expert opinion supported by facts that impacts could result due to subsidence. However, as indicated in Response to Comment 40-136, The Original DEIR includes Mitigation Measure Earth Resources 2 which requires that future applicants provide a geotechnical report to include building design considerations, and shall comply with relevant building codes and Department of Building and Safety standards. Such geotechnical report would be required to identify, along with potential for liquefaction, any risks due to potential subsidence and advance structural design measures accordingly.
- 40-149 See Response to Comment 27-101 regarding methane zone and methane zone data/maps. The City of Los Angeles maintains the Zoning Information and Map Access System (ZIMAS) which provides information available to Department of Building and Safety and Department of City Planning staff, as well as the general public that provides information as to the “Methane Zone” or a “Methane Buffer Zone” on a parcel level. Mitigation Measures Hazardous Materials 8 has been added to require project specific mitigation (such as venting and detection) when property is identified in ZIMAS as being within a “Methane Zone” or a “Methane Buffer Zone”. Any member of the public will be able to access ZIMAS to determine if a building permit is issued for a property in a methane zone. See Corrections and Additions for expanded discussion of impacts due to methane.

40-150 The basis of the analysis of groundwater levels in the Project Area and potential impacts related to the future performance of stormwater infiltration systems disclosed in the Ninyo and Moore Report in Appendix 6A was applied to Impact Hydrology and Water Quality 2 found on page 7-29 in the Original DEIR. Implementation of Mitigation Measure Hydrology and Water Quality 2, which requires Department of Public Works to review the stormwater detention and infiltration facilities associated with specific proposed development to ensure infiltration of stormwater can be accomplished without raising groundwater conditions to levels adversely affecting facilities or structures. See page 7-29 of the Original DEIR.

40-151 See Response to Comment 27-150.

40-152 The comment indicates that Figure 7-7 does not name the Central or San Fernando Basins. The comment also appears to present facts as to the groundwater flow and mentions that groundwater level is 200 feet below the ground surface in the Project Area and lies in the Puente Formation. However, the comment presents no information as to any deficiencies with the analysis. Groundwater is discussed on pages 7-13 to 7-16 of the Original DEIR.

The comment is noted and Figure 7-7 has been revised. Please see Corrections and Additions. The information provided in Figure 7-8 is intended to compliment the more detailed information in the text of Section 7.1.6 which describes in narrative the groundwater levels and flows of the Original DEIR. A comprehensive map of groundwater contours of the Central Groundwater Basin and San Fernando Groundwater Basin is beyond the scope of the analysis.

40-153 The LADWP Water Supply Assessment (WSA) was used as a basis for determining the sufficient water supplies availability for the Proposed Alternative in Chapter 15 of the Original DEIR. It is not necessary to reference the WSA in Chapter 7 of the Original DEIR since it does not inform the local hydrological conditions or evaluate project related impacts on waterways, groundwater supply, or stormwater conveyance.

In addition, the comment states the need to re-circulate though provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the deficiency of the analysis.

40-154 The comment states the need to re-circulate though provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the deficiency of the analysis. The potential impact on future performance of stormwater infiltration systems is addressed in Response to Comment 40-150. See page 7-29 of the Original DEIR.

40-155 The comment appears to indicate a general concern with a lack of proper references and citation but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the inadequacy of the analysis.

40-156 The comment claims that Chapter 10 is inadequate and incomplete but provides no facts, reasonable assumptions based on facts, or expert opinion supported by facts attesting to the inadequacy of the analysis. See Response to Comment 27-98 for discussion of revised hazardous materials analysis, new mitigation and figures that show locations of properties with historic contamination. New Figures 10-1 to 10-8 are provided along with revised text in the Corrections and Additions section if this FEIR.

40-157 The comment claims that maps or historic photos for Oil and Gas facilities should have been provided. In addition, the comment states the need to re-circulate though provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the deficiency of the analysis. See Response to Comment 27-100 regarding revised analysis of oil and gas wells and revised analysis of sites potentially impacted soil and groundwater.

40-158 The comment claims that the scope of the work inadequately characterizes the Project Area. The Comment is noted. See Response to Comment 27-98 for discussion of revised hazardous materials analysis, new mitigation and figures that show locations of properties with historic contamination. New Figures 10-1 to 10-8 are provided in the Corrections and Additions Section along with revised text that includes revisions to Mitigation Measures Hazardous Materials 4, and adds new Mitigation Measures Hazardous Materials 8, Mitigation Measures Hazardous Materials 9, and Mitigation Measures Hazardous Materials 10.

In addition, the comment states the need to re-circulate though provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the deficiency of the analysis.

40-159 The comment states that Chapter 10 is inadequate and incomplete due to insufficient review of contaminated sites. An extensive record search was performed as part of the Ninyo and Moore Property Inventory Study that included the DTSC Envirostor Database, the State Water Resources Control Board (SWRCB) Geotracker Database, an Environmental First Search database (performed by CRA/LA), and a list maintained by the former Environmental Affairs Department (EAD). A limited revision of the record search was performed in April 2012 that included updated data from DOGGR DOMS online mapping system, DTSC Envirostor Database, and the SWRCB Geotracker Database as part of the expanded analysis. See Corrections and Additions for revisions to Section 10.1.2 of the Original DEIR.

In addition, Hazardous Materials Mitigation Measure 4 requires that properties listed for sites with a rank 1 through 3 (properties with either known unresolved environmental issues, properties with environmental concerns in the past, or sites with historic uses that warrant concern), shall conduct subsequent investigations and undertake remediation as necessary to remediate contamination. As the EIR is a programmatic document and there are no specific development projects proposed at this time, future applicants will need to demonstrate that the project property satisfies the environmental quality of the prevailing standards. In addition, and contrary to the comment assumptions of financial benefit of not disclosing site contamination histories, it is standard practice in the real estate

industry to perform at least a Phase I Environmental Site Assessment for real estate development projects prior to receive financing, regardless of governing regulations.

40-160 The comment is unclear as to why the use of terms “known”, “selected”, and “available databases” renders the Appendix 10A inadequate, and provides no example of what may constitute substantiation. Regarding the database sources for what may constitute substantiation, see Response to Comment 40-159.

In addition, the comment states the need to re-circulate though provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the deficiency of the analysis.

40-161 The comment states that the discussion in Appendix 10A is an extension of methodology rather than results achieved as ranking and a GIS database. The results are included in Section 5.3 and 5.4 in the Ninyo & Moore Property Inventory Study. The records of the properties were reviewed and summarized in Table 1 and identified in Figure 2 of the Property Inventory Study. The GIS database will be available and included and appended to the final version of the Specific Plan.

The comment does not demonstrate how the property record summary found in Table 1 and Figure 2 of Ninyo & Moore Property Inventory Study does not constitute supporting information. The comment states the need to re-circulate though provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the deficiency of the analysis.

40-162 The comment states that the report preparers appear unaware of the many reports available from federal, state, regional, county, and city sources. The Ninyo & Moore Property Inventory Study relied on the full list of inventories from multiple agency sources. See Response to Comment 40-159, Section 10-4 through 10-6 of the Original DEIR, and Corrections and Additions for revisions to Section 10.1.2 of the Original DEIR.

40-163 The comment states that the Original DEIR hazardous materials analysis is incomplete and inadequate as to the potential impacts from encountered hazardous wastes and materials during construction and spreading of contaminated groundwater based on lack of information contained in the Original DEIR. However, the basis of this conclusion is uncertain. The comment references a conclusory finding in the Ninyo & Moore Property Inventory Study that characterizes groundwater quality and soil impacts which is based on the record search that were reviewed and summarized in Table 1 and identified in Figure 2 of the Property Inventory Study.

The comment does not demonstrate how the property record summary found in Table 1 and Figure 2 of Ninyo & Moore Property Inventory Study does not constitute supporting information. The comment states the need to re-circulate though provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the deficiency of the analysis.

40-164 The comment references railroad track yards and a coal gasification plant south of the Los Angeles County Jail and LACMTA Bus Yard as potential sources of hazardous waste contamination. However, these facilities, if the rail yard refers to the Los Angeles Transportation Center railyard, are outside of the Project Area boundary. The historical aerial photographs show a railyard (Chinatown Yard) formerly occupied the site of the Los Angeles (Cornfield) State Historic Park is now. Potential impacts on release of hazardous materials due to historic use as a railway were already evaluated in the Los Angeles State Historic Park's Master Development Plan EIR with mitigations incorporated therein.

The Ninyo & Moore Property Inventory Study provides support to the findings and conclusions of the Hazardous Materials impact evaluation in Chapter 10 of the Original DEIR. As a supporting document in the Appendices, it was accessible to anyone wishing to review and provide comment on the Original DEIR and the property ranking criteria and results do not need to be reproduced in the main text of Chapter 10.

In addition, the comment states the need to re-circulate though provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the deficiency of the analysis.

40-165 The comment states that there are many geotechnical and methane reports available from federal, state, regional, county, and city sources. See Response to Comment 40-159 and 40-162, and Section 10-4 through 10-6 of the Original DEIR, and Corrections and Additions for revisions to Section 10.1.2 of the Original DEIR for federal, state, regional, county, and city databases. See Corrections and Additions for Mitigation Measures Hazardous Material 4 which requires future Phase 2 ESA investigations.

See Response to Comment 27-101, 40-140 and 40-142 for responses related to methane.

The comment requests the scope of work for the consultant to ascertain whether recommendations of additional assessment are consistent with the contract. The EIR is a programmatic document and there are no specific development projects proposed at this time that could provide the level of detail requested by the comment. The review of property records and the various agency database listed in Section 10.1.2 in the Original DEIR is sufficient basis to provide means to address potential impacts due to contaminated properties. Mitigation Measures Hazardous Material 4 requires future Phase 2 ESA investigations for properties of concern.

In addition, the comment states the need to re-circulate though provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the deficiency of the analysis. See Corrections and Additions for Mitigation Measures Hazardous Material 4 which requires future Phase 2 ESA investigations.

40-166 The comment requests the scope of work for the consultant to ascertain whether the expressed limitations that findings of the report can be invalidated over time, as conditions of the Project Area may change are consistent with the contract. It is hereby noted that the a consultants location in the time space continuum presents a practical

barrier in preparing findings for events that have not transpired and prevents them from making any reasonable guarantees that apply for all time.

In addition, the comment states the need to re-circulate though provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the deficiency of the analysis.

40-167 The comment provides a general statement that implementation of the CRA Redevelopment Plan would make a reasonable difference in whether the Proposed Alternative would lead to gentrification of all tenant occupied residential units and result in the displacement of lower and middle income tenants. However, the comment provides no facts, reasonable assumption based on facts, or expert opinion supported by facts that the proposed Alternative would lead to gentrification and displacement of existing tenants in the Project Area. See Master Response 1 discussion on Displacement.

41. Gabrieleño Band of Mission Indians, Andy Alas, Chairman, May 20, 2012

41-1 The comment request that an experienced and certified Native American monitor be on site during all ground disturbances and would like to participate in the consultation process. Please see Mitigation Measure 9.3 in the Mitigation Monitoring Plan in Appendix A1 which requires that a Native American of Gabrielino descent observe and monitor sub-surface activities.

41-2 The comment notes that the Native American Heritage Commission will always refer contractors to the local tribes. Please see Response to comment 41-1.

41-3 The comment requests that this response be included in your FEIR. The letter is included.

General Response to Comments Received on the RP-DEIR

Some of the comments received on the RP-DEIR have raised issues that were beyond the scope included in the RP-DEIR. As stated in Section 1.A.III of the RP-DEIR, CEQA Guidelines Section 15088.5 (f)(2) permits the City to request that reviewers limit scope of their comments to that material which is within the text of the revised portions included in the RP-DEIR. Pursuant to this, the City has requested that reviewers not make new comments on matters already addressed in the Original DEIR and not included in this RP-DEIR. In limited circumstances, the lead agency is required to provide additional analysis when “significant new information” is added to the EIR after public notice is given of the availability of the DEIR for public review under Section 15087 but before certification” of the EIR. “Significant new information” added to an EIR requires recirculation only when that information discloses that:

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

A lead agency’s determination not to recirculate a DEIR must be supported by substantial evidence in light of the whole record before the agency.²⁴

The City received several written comments purporting to introduce “significant new information” necessitating recirculation of the RP-DEIR to revise various impact analyses beyond the impact analyses contained in the RP-DEIR. The City has considered each of these comments, and recirculation of the RP-DEIR is not warranted because (1) such comments raise issues already addressed in the Original DEIR or the RP-DEIR and/or (2) the information in the comments does not constitute “significant new information” within the meaning of CEQA.

Specific Responses to Comments Received on the RP-DEIR

RP-1. Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit, Scott Morgan, Director, July 17, 2012

Did not comment on RP-DEIR.

²⁴ State CEQA Guidelines Sections 15088.5(e), 15384(a); *Laurel Heights improvement Assn. v. Regents of University of California* (1993) 6 Cal. 4th 1112, 1135. State CEQA Guidelines Section 15384 defines “substantial evidence” as “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.”

RP-2. California Department of Transportation (Caltrans) - District 7, Division of Environmental Planning, Gary Iverson, Senior Environmental Planner, July 10, 2012

Did not comment on RP-DEIR.

RP-3. Department of Conservation's Division of Oil, Gas, and Geothermal Resources, Syndi Pompa, Associate Oil and Gas Engineer, June 1, 2012

Did not comment on RP-DEIR.

RP-4. South Coast Air Quality Management District, Ian MacMillan, Program Supervisor, July 13, 2012

RP4-1 The comment suggests that the City should provide a minor clarification to Mitigation Measure Air Quality 2 of the RP-DEIR that explicitly defines "acceptable level for cancer and non-cancer risks." In response to the comment, both Mitigation Measure Air Quality 2 and Mitigation Measure Air Quality 10 have been revised to define "acceptable level" for cancer risks not to exceed one in one hundred thousand (1.0E-05), and "acceptable level" for non-cancer hazard index not to exceed 1.0. See Corrections and Additions.

RP-5. City of Los Angeles Bureau of Sanitation, Wastewater Engineering Services Division, Ali Poosti, Acting Division Manager, June 25, 2012

RP5-1 The comment states that the primary sewer lines in the Project Area are in fair and very good condition and that no additional hydraulic relief projects are needed. Comment is noted and will be forwarded to the decision maker.

RP5-2 The comment states that the secondary sewers have no current conveyance capacity constraints within the Project Area based on existing gauging information. Comment is noted and will be forwarded to the decision maker.

RP5-3 The comment states that the preliminary results of the Secondary Sewer Plan Reports recommend three future sewer point repair projects and one sewer replacement project for the existing sewers within the Project Area. Comment is noted and will be forwarded to the decision maker.

RP5-4 The comment states that a more detailed review of the individual projects will be required when sufficient detail is developed. The comment lists submission requirements for a more detailed review that include a Sewer Capacity Availability Request (SCAR). The comment also states that if public sewers are shown to have insufficient capacity to serve any proposed building, then the developer is required to build a public sewer to a point in the sewer system with sufficient capacity, and that final approval for sewer capacity and connection permit will be made at that time. As the EIR is a programmatic document and there are no specific development projects proposed at this time that can provide the level

of information required by a SCAR (such as exact building location, type, use, proposed sewer connections, etc.). The comment is accurate in stating that future applicants will either need to demonstrate that the development project can be accommodate by the existing sewer capacity or build a public sewer to a point in the sewer system with sufficient capacity prior to the issuance of a building permit. Comment is noted and will be forwarded to the decision maker.

RP-6. City of Los Angeles Bureau of Engineering, Los Angeles River Project Office, Carol Armstrong, Director, July 16, 2012

Did not comment on RP-DEIR.

RP-7. Southeast Asian Community Alliance, and Public Counsel Law Center, July 16, 2012

RP7-1 The comment states a general concern that, despite the additional information contained in the RP-DEIR, the RP-DEIR fails to adequately disclose, analyze and mitigate many of the CASP's significant adverse impacts. However, the comment provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the inadequacy of the mitigation.

The comment refers to the failure of the RP-DEIR to address the suggested COD alternative. Those matters are outside the scope of the RP-DEIR. Please refer to the above General Response to 7-2.

RP7-2 The comment is substantially the same as 27-3. See Response to Comment 27-3.

RP7-3 The comment states generally the CASP DEIR conclusions and analysis are faulty and refers to the failure of the RP-DEIR (and DEIR) to address the suggested COD alternative. Regarding the need for the RP-DEIR to include additional analysis based on comments included here and made in Comment Letter 27, the comments adds no significant new information. As such, those matters are outside the scope of the RP-DEIR. Please refer to the above General Response to Comments Received on the RP-DEIR for a discussion on the City's obligation to respond to comments outside the scope of the RP-DEIR, and the standards for recirculation of a Draft EIR due to "significant new information."

RP7-4 The comment alleges the DEIR misuses the application of tiering under CEQA to avoid reaching significance conclusions. Comment substantially the same as 27-7. See Response to Comment 27-7.

RP7-5 The comment suggests the City failed to respond to comments made on the DEIR and yet the FEIR had not yet been released. Comments on the November 23, 2011 letter that is referred to in this comment, are included in the response to comments section 3.

RP7-6 The comment alleges the DEIR failed to analyze the consistency between the Proposed Alternative and the City's Land Use Element and is substantially the same as 27-9. See Response to Comment 27-9.

RP7-7 The comment is substantially the same as 27-10. See Response to Comment 27-10.

RP7-8 The comment is substantially the same as 27-11. See Response to Comment 27-11.

RP7-9 The comment is substantially the same as 27-12. See Response to Comment 27-12.

RP7-10 The comment is substantially the same as 27-13. See Response to Comment 27-13.

RP7-11 The comment is substantially the same as 27-14. See Response to Comment 27-14.

RP7-12 The comment is substantially the same as 27-15. See Response to Comment 27-15.

RP7-13 The comment is substantially the same as 27-16. See Response to Comment 27-16.

RP7-14 The comment is substantially the same as 27-17. See Response to Comment 27-17.

RP7-15 The comment is substantially the same as 27-18. See Response to Comment 27-18.

RP7-16 The comment is substantially the same as 27-19. See Response to Comment 27-19.

RP7-17 The comment is substantially the same as 27-20. See Response to Comment 27-20.

RP7-18 The comment is substantially the same as 27-21. See Response to Comment 27-21.

RP7-19 The comment is substantially the same as 27-22. See Response to Comment 27-22.

RP7-20 The comment is substantially the same as 27-23. See Response to Comment 27-23.

RP7-21 The comment is substantially the same as 27-24. See Response to Comment 27-24.

RP7-22 The comment is substantially the same as 27-25. See Response to Comment 27-25.

RP7-23 The comment is substantially the same as 27-26. See Response to Comment 27-26.

RP7-24 The comment is substantially the same as 27-27. See Response to Comment 27-27.

RP7-25 The comment is substantially the same as 27-28. See Response to Comment 27-28.

RP7-26 The comment is substantially the same as 27-29. See Response to Comment 27-29.

RP7-27 The comment is substantially the same as 27-30. See Response to Comment 27-30.

RP7-28 The comment is substantially the same as 27-31. See Response to Comment 27-31.

RP7-29 The comment is substantially the same as 27-32. See Response to Comment 27-32.

RP7-30 The comment is substantially the same as 27-33. See Response to Comment 27-33.

RP7-31 The comment is substantially the same as 27-34. See Response to Comment 27-34.

RP7-32 The comment is substantially the same as 27-35. See Response to Comment 27-35.

RP7-33 The comment is substantially the same as 27-36. See Response to Comment 27-36.

RP7-34 The comment is substantially the same as 27-37. See Response to Comment 27-37.

RP7-35 The comment is substantially the same as 27-38. See Response to Comment 27-38.

RP7-36 The comment is substantially the same as 27-39. See Response to Comment 27-39.

RP7-37 The comment is substantially the same as 27-40. See Response to Comment 27-40.

RP7-38 The comment is substantially the same as 27-41. See Response to Comment 27-41.

RP7-39 The comment alludes to specific deficiencies and legal shortcomings of the Original DEIR and RP-DEIR stating that both the DEIR and RP-DEIR should be revised to analyze and disclose impacts discussed in comments RP7-40 through RP7-90. Many of the issues discussed in the comments are outside the scope of the RP-DEIR. Please refer to the above General Response to Comments Received on the RP-DEIR for a discussion on the City's obligation to respond to comments outside the scope of the RP-DEIR, and the standards for recirculation of a Draft EIR due to "significant new information." See Response to Comment RP7-40 through RP7-90 for specific responses.

RP7-40 The comment is substantially the same as 27-42. See Response to Comment 27-42.

RP7-41 The comment is substantially the same as 27-44. See Response to Comment 27-44.

RP7-42 The comment is substantially the same as 27-45. See Response to Comment 27-45.

RP7-43 The comment is substantially the same as comments 27-46 through 27-48, and presents no "new information" that was not already addressed in the response to those comments. See Responses to Comments 27-46 through 27-48 as well as Section 2.A-1 of the RP-DEIR.

RP7-44 The comment is substantially the same as 27-49. See Response to Comment 27-49.

RP7-45 The comment states that the RP-DEIR does not address the appropriate GHG baseline emissions. See response to comment RP7-46.

RP7-46 The comment is substantially the same as 27-50. See Response to Comment 27-50.

RP7-47 The comment is substantially the same as 27-51. See Response to Comment 27-51.

RP7-48 The Comment states that the RP-DEIR does not evaluate quantitative and qualitative GHG emissions in context of cumulative GHG impacts, failing to address the deficiency of Chapter 16 in the Original DEIR. Where in fact, the RP-DEIR explicitly grounds the GHG evaluation as a cumulative impact discussion. Page 2.B-12 of the RP-DEIR states the following: “Given the scale and complexities of global climate change, no individual Proposed Alternative or plan could be shown to directly result in global climate change. However, each project could be seen to potentially contribute to an increase in GHG emissions that would be considered cumulatively considerable when viewed in conjunction with all other contributing GHG sources.” In establishing a quantified criteria in determining significance, Page 2.B-12 of the RP-DEIR also states “Assessing the significance of a project’s contribution to cumulative global climate change involves: (1) developing an inventory of project GHG emissions; and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth by AB 32” (emphasis added). The RP-DEIR provides both a quantitative and qualitative evaluation in determining whether the Proposed Alternative would have a cumulative impact from increased GHG impacts. See Section 2.B of the RP-DEIR for the revised analysis of GHG impacts and Response to Comment 27-60.

RP7-49The Comment states that the RP-DEIR attempts to apply a “ratio theory” in the GHG evaluation by stating that the population growth in Los Angeles will occur regardless of the Proposed Alternative. In actuality, the RP-DEIR identifies a potentially significant cumulative GHG impact based on increase in growth in GHG emissions and specifically does not apply a ‘ratio theory’ in reaching an impact conclusion. As stated in Section 2.B of the RP-DEIR, the RP-DEIR evaluates whether the Proposed Alternative will contribute to a cumulative increase of GHG emissions on both a quantitative and qualitative basis. The quantitative discussion was determined as to whether the GHG emissions reduction constitutes an equivalent or larger break from “business-as-usual” than has been determined necessary to meet the state AB 32 goals for 2020 (approximately 16 percent), and the qualitative discussion was informed by whether the approval of the Proposed Alternative would conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. Neither of these factors constitutes the application of a “ratio theory” as described by the comment. This comment is also addressed in DEIR Response to Comments 27-60.

RP7-50The comment is substantially the same as 27-75. See Response to Comment 27-75 related to the current alternative transportation mode split of the Project Area and the future mode split as a result of the Proposed Alternative. Also see Master Response related to adverse impacts of displacement as a result of the Proposed Alternative.

RP7-51 The comment is substantially the same as 27-76. See Response to Comment 27-76.

RP7-52 The comment is substantially the same as 27-77. See Response to Comment 27-77.

RP7-53 The comment is substantially the same as 27-78. See Response to Comment 27-78.

RP7-54 The comment is substantially the same as 27-79. See Response to Comment 27-79.

RP7-55 The comment is substantially the same as 27-80. See Response to Comment 27-80.

RP7-56 The comment is substantially the same as 27-81. See Response to Comment 27-81.

RP7-57 The comment is substantially the same as 27-82. See Response to Comment 27-82.

RP7-58 The comment is substantially the same as 27-83. See Response to Comment 27-83.

RP7-59 The comment is substantially the same as 27-84. See Response to Comment 27-84.

RP7-60 The comment is substantially the same as 27-85. See Response to Comment 27-85.

RP7-61 The comment is substantially the same as 27-86. See Response to Comment 27-86.

RP7-62 The comment is substantially the same as 27-90. See Response to Comment 27-90.

RP7-63 The comment is substantially the same as 27-91. See Response to Comment 27-91.

RP7-64 The comment is substantially the same as 27-92. See Response to Comment 27-92.

RP7-65 The comment is substantially the same as 27-93. See Response to Comment 27-93.

RP7-66 The comment is substantially the same as 27-94. See Response to Comment 27-94.

RP7-67 The comment is substantially the same as 27-95. See Response to Comment 27-95.

RP7-68 The comment is substantially the same as 27-96. See Response to Comment 27-96.

RP7-69 The comment is substantially the same as 27-97. See Response to Comment 27-97.

RP7-70 The comment is substantially the same as 27-111. See Response to Comment 27-111.

RP7-71 The comment is substantially the same as 27-112. See Response to Comment 27-112.

RP7-72 The comment states the RP-DEIR fails to compare existing noise levels with expected noise levels under the Proposed Alternative. The EIR is a programmatic document and there are no specific development projects proposed at this time that could provide the level of detail requested by the comment. However, due to the degree of uncertainty attributed to the programmatic nature of the document, the portion of the Original DEIR related to construction noise impacts has been revised and recirculated in the RP-DEIR on May 31st, 2012 to disclose that noise and vibration impacts related to future construction activities would be considered significant and unavoidable. See Section 2.C of the RP-DEIR for the revised construction noise analysis.

RP7-73 The comment is substantially the same as 27-115. See Response to Comment 27-115.

RP7-74 The comment is substantially the same as 27-116. See Response to Comment 27-116.

RP7-75 The comment is substantially the same as 27-117. See Response to Comment 27-117.

RP7-76 The comment is substantially the same as 27-118. See Response to Comment 27-118.

RP7-77 The comment is substantially the same as 27-138. See Response to Comment 27-138.

RP7-78 The comment is substantially the same as 27-139. See Response to Comment 27-139.

RP7-79 The comment is substantially the same as 27-140. See Response to Comment 27-140.

RP7-80 The comment is substantially the same as 27-141. See Response to Comment 27-141.

RP7-81 The comment is substantially the same as 27-142. See Response to Comment 27-142.

RP7-82 The comment is substantially the same as 27-143. See Response to Comment 27-143.

RP7-83 The comment is substantially the same as 27-144. See Response to Comment 27-144.

RP7-84 The comment is substantially the same as 27-145. See Response to Comment 27-145.

RP7-85 The comment is substantially the same as 27-146. See Response to Comment 27-146.

RP7-86 The comment is substantially the same as 27-147. See Response to Comment 27-147.

RP7-87 The comment is substantially the same as 27-148. See Response to Comment 27-148.

RP7-88 The comment is substantially the same as 27-149. See Response to Comment 27-149.

RP7-89 The comment is substantially the same as 27-150. See Response to Comment 27-150.

RP7-90 The comment is substantially the same as 27-151. See Response to Comment 27-151.

RP7-91 The comment is substantially the same as 27-152. See Response to Comment 27-152.

RP7-92 The comment is substantially the same as 27-153. See Response to Comment 27-153.

RP7-93 The comment states that the RP-DEIR fails to address most of the inadequacy concerns contained in in the November 23, 2011 letter (Comment letter 27). The remainder of the comment is substantially the same as 27-154, See Response to Comment 27-154.

RP7-94 The comment is substantially the same as 27-155. See Response to Comment 27-155.

RP7-95 The comment is substantially the same as 27-156. See Response to Comment 27-156.

RP7-96 The comment is substantially the same as 27-157. See Response to Comment 27-157.

RP7-97 The comment is substantially the same as 27-158. See Response to Comment 27-158.

RP7-98 The comment is substantially the same as 27-159. See Response to Comment 27-159.

RP7-99 The comment is substantially the same as 27-160. See Response to Comment 27-160.

RP7-100 The comment is substantially the same as 27-161. See Response to Comment 27-161

RP7-101 The comment is substantially the same as 27-162. See Response to Comment 27-162

RP7-102 The comment is substantially the same as 27-164. See Response to Comment 27-164

RP7-103 The comment restates its concerns that the RP-DEIR should have included additional analysis based on comments included in both RP Comment Letter 7 and Comment Letter 27. The comment further identifies topics that should be included in the FEIR. The comments adds no significant new information. Please refer to the above General Response to Comments Received on the RP-DEIR for a discussion on the City's obligation to respond to comments outside the scope of the RP-DEIR, and the standards for recirculation of a Draft EIR due to "significant new information."

RP7-104 Regarding the need to adopt or evaluate the COD Alternative see Response to Comment 27-152.

RP-8. Law Offices of Gilchrist and Rutter, Elisa L. Paster, July 16, 2012

RP8-1 The comment states that that substantial revisions included in RP-DEIR cannot be addressed in isolation but must be considered in context of the entire Original DEIR. Many of the matters discussed in this comment letter are outside the scope of the RP-DEIR. Please refer to the above General Response to Comments Received on the RP-DEIR for a discussion on the City's obligation to respond to comments outside the scope of the RP-DEIR, and the standards for recirculation of a Draft EIR due to "significant new information."

RP8-2 The comment raises concerns with the substantive contents of the Proposed Alternative that involve "unrealistic development standards and zoning" that may lead to environmental impacts that do not support the assumptions in the Original DEIR or the RP-DEIR. The comment does not specify the aspects of the Proposed Alternative that qualify as unrealistic.

RP8-3 The comment states that the Original DEIR or the RP-DEIR fail to achieve the goal of a program EIR to not require additional analyses due to a faulty project description, incomplete environmental analyses and flawed assumptions and must be revised and recirculated. The comment does not provide facts, or evidence based on facts as to why the project description was faulty, the analysis was incomplete, or was based on flawed

assumptions. Therefore, recirculation is not necessary. The response to the comment's concern that the project description was inadequate is addressed in Response to Comments RP8-7 through RP8-11.

- RP8-4 The comment expresses support for the goals of the Proposed Alternative but alleges that conformance with LEED ND criteria makes those goals unrealistic and infeasible. The comment provides current conditions of the Downtown commercial office and residential vacancy rate to demonstrate the lack of demand for more commercial/office in Chinatown vicinity. Comment is noted and will be forwarded to the decision maker. As a point of clarification, future projects will not need to demonstrate compliance with LEED ND standards but will need to demonstrate compliance with the regulations and standards of the Proposed Alternative upon its adoption.

The discussion of the changing real estate economic conditions and opportunities within the Project Area and greater vicinity or future project conformance with LEED ND criteria is outside the scope of the RP-DEIR. Please refer to the above General Response to Comments Received on the RP-DEIR for a discussion on the City's obligation to respond to comments outside the scope of the RP-DEIR, and the standards for recirculation of a Draft EIR due to "significant new information."

- RP8-5 The comment states that, based on assumptions made about the lack of commercial demand, the identified parcels in the Project Area will remain undeveloped and invalidate the Original DEIR assumptions that the Proposed Alternative would result in reduced vehicle miles travelled (VMT). However, the comment offers no facts, or evidence based on facts that the Project Area will remain undeveloped or that the VMT assumptions contained in the RP-DEIR are not valid. However, the comment is noted and will be forwarded to the decision maker.

- RP8-6 The comment, in reference to the area around the Chinatown Gold Line station, argues for permitting a higher percentage of residential land uses with ground floor commercial and/or live/work units that would go further to achieve reduced dependence on single-occupancy vehicles and that conformance with the LEED-ND standards is impractical. The GHG analysis included in the RP-DEIR found that the Proposed Alternative would have a less than significant cumulative impact from GHG emissions. Therefore, the RP-DEIR is not required under CEQA to include an alternative that would further reduce GHG emissions. However, the comment's concern with the needs to balance job-housing with higher percentage of residential land uses is noted and will be forwarded to the decision maker.

- RP8-7 The comment states that the City is in violation of CEQA's requirements to analyze and disclose environmental impacts that would result from the revisions to the Proposed Alternative that were made after the release of the Original DEIR, and that the evaluation of impacts to the revised project should have been included as part of the RP-DEIR. Pursuant to Section 15088.5(a) of the CEQA Guidelines, the lead agency is required to re-circulate when "significant new information" is added after the lead agency has released the Notice of Availability of the DEIR. The CEQA Guidelines defines "information" as "changes in the project or environmental setting as well as additional

data or other information.” Revisions to the Proposed Alternative after the release of the Original DEIR would qualify as “new information.” However, the CEQA Guidelines clarifies that new information added to an EIR is ‘significant’ when it results in either a substantial adverse effect or feasible way to mitigate or avoid such an effect that the lead agency has declined to implement.

Section 5 of the FEIR, Supplemental Analysis of the Project Revisions, describes the revisions to the Proposed Alternative (Revised Proposed Alternative) and provides an analysis of the revisions in comparison to the Proposed Alternative as was evaluated in the Original DEIR and RP-DEIR. As a result of the analysis, it was determined that the Revised Proposed Alternative does not result in a new significant environmental impact that was not previously disclosed, or does not lead to a substantial increase in the severity of environmental impacts identified in either the Original DEIR or the RP-DEIR. Therefore, changes included in the Revised Proposed Alternative do not qualify as “significant new information” that would require to be re-circulated pursuant to Section 15088.5 of the CEQA Guidelines. See Section 5 of the FEIR, Supplemental Analysis of the Project Revisions for a description of revised changes to the Proposed Alternative and the additional analyses of impacts.

RP8-8 The comment states that the Project Description in the original DEIR was legally insufficient, and that neither the Original DEIR nor the RP-DEIR defines the range of uses that would be allowed under the Proposed Alternative to enable an adequate analysis of project impacts.

Section 2.2.1.3 of the Original DEIR provided the a general summary description of the Proposed Alternative’s new hybrid industrial land use designations (Urban Village, Urban Innovation, Urban Center), in addition to describing the Bonus FAR Incentive Program and other land use regulatory requirements. As a matter of practically, it would be redundant to include the precise detail of uses that would be permitted on any one site in the Project Area as this information was readily available prior to the release of the Original DEIR in the full Draft of the Cornfield Arroyo Seco Specific Plan (CASP), here defined as the Proposed Alternative.

The full Draft of the CASP was available online at the time of the release of the Notice of Preparation (NOP). The website, <https://sites.google.com/site/cornfieldsla/index> was included in both the two different NOPs that were released on February 27, 2009 and December 15, 2010. The website provided the public with access and opportunity to review the full Draft CASP, which provided the level of detail requested in the comment. See Appendix A5 for the full Draft Plan.

RP8-9 The comment reiterates the complaint that information regarding specific uses is not specific enough. Section 2.2.1.3 of the Original DEIR provided the a general summary description of the Proposed Alternative’s new hybrid industrial land use designations (Urban Village, Urban Innovation, Urban Center, and Greenways), in addition to describing the Bonus FAR Incentive Program and other land use regulatory requirements. The full Draft of the CASP was available at the time of the Notice of Availability of the Original DEIR (included in the FEIR as Appendix A5). The Original DEIR evaluated the

impacts and included mitigation measures based on the Proposed Alternative as described in Section 2.2.1.3 of the Original DEIR and the full Draft of the CASP. Any further detail regarding specific, future projects in the project area would be remote and speculative. The EIR is a programmatic document and there are no specific development projects proposed at this time, future applicants will need to demonstrate that the project property satisfies the prevailing standards and mitigations set forth in the Proposed Alternative. See Response to Comment RP8-8 regarding availability of a more precise project description.

RP8-10 The comment states that the Original DEIR and RP-DEIR fails to disclose any detail regarding the particular types of uses that would be allowed under the Proposed Alternative, including industrial uses that would emit Toxic Air Contaminates (TACs) adjacent to sensitive receptors. See Response to Comment RP8-8 regarding the information available of the Project Description that includes the uses permitted by the Proposed Alternative. The health risk impacts of siting sensitive receptors in proximity to industrial sources was discussed in Section 2.A.1 of the RP-DEIR. Mitigation Measure Air Quality 3 was added to the RP-DEIR that requires air filters for sensitive uses proposed within the designated distances the TAC emitting industrial uses. Further, specific projects that include industrial uses will be required to comply with applicable environmental and health regulations, including SCAQMD permitting programs.

RP8-11 The comment alleges the Project Description is vague to the point that “virtually anything” could be built in the project area via administrative clearance. See Response to Comment RP8-8.

RP8-12 The comment argues since project design features are not detailed in the Original DEIR or the RP-DEIR Project Description they are not components of the Proposed Alternative and therefore may not be implemented. The comment is referring to features that are identified as comments RP8-13, RP8-14 and RP8-15. See Response to Comment RP8-13, RP8-14 and RP8-15. See Response to Comment RP8-8 regarding the details provided in the Draft CASP.

RP8-13 The comment suggests there is a lack of detail in Project description of the Original DEIR and the RP-DEIR regarding TDM strategies as project features that calls into question their future implementation and current related impact assumptions. TDM strategies are discussed in the Original DEIR Chapter 4, Transportation, beginning on Page 4-46 as well as detailed in the CASP.

RP8-14 The comment suggests since the parking cap is not included in the Project Description it cannot be assumed to be part of the Proposed Alternative. A parking cap figure was initially included on page 5-06 in the Draft CASP with the overall maximum number of spaces per each subarea undetermined, though the figure stated that the maximum parking amounts for the subareas were to be included in the Original DEIR. The maximum parking amounts were provided in Table 4-5 of the Original DEIR and are now included in Section 2.5.C of the Draft CASP included Appendix A5 of this FEIR. See Response to Comment RP8-8 as to the availability of the Draft CASP.

RP8-15 The comment argues there is insufficient detail to provide assurance the Proposed Alternative can accommodate affordable housing. Please see Response to Comment 27-20.

RP8-16 The comment states that property that may be used for possible future expansion of public services facilities should be identified in the DEIR and its absence calls into question the findings of the DEIR. The EIR is a programmatic document and there are no specific development projects proposed at this time, therefore discussion of specific, possible future expanded public facilities in the project area would be remote and speculative. Also see Response to Comments 27-122a and 27-122c.

RP8-17 The comment alleges the EIR requires recirculation owing to the vague Project Description as detailed in the commenter's previous comments. Please see Response to Comments RP8-8, and RP8-12 through RP-16.

RP8-18 The comment argues adhering to LEED ND criteria is overly proscriptive and results in the undermining of the purposes of CEQA. The comment also states alternative land use changes would reduce the projects impacts but provides no detail allowing further comment regarding the claim.

RP8-19 The comment alleges there is a lack of material analysis of traffic and transit impacts. Project impacts related to the transit system is outside the scope of the RP-DEIR. Please refer to the above General Response to Comments Received on the RP-DEIR for a discussion on the City's obligation to respond to comments outside the scope of the RP-DEIR, and the standards for recirculation of a Draft EIR due to "significant new information."

RP8-20 The comment alleges that since the Historic Park Master Plan is not included in the cumulative impacts analysis the EIR is fundamentally flawed and therefore the Historic Park Master Plan must be incorporated into the EIR and the document recirculated.

The Los Angeles State Historic Park Master Development Plan (LASHP) DEIR was released on January 12, 2012 and the Original DEIR was released on September 22, 2011. Therefore, the project-related impacts of the LASHP were not known at the time of release of the Original DEIR. However, the LASHP DEIR included the Proposed Alternative as a related project in the cumulative impact analysis, and therefore impacts related to the development of the LASHP and the Proposed Alternative have been disclosed to the public pursuant to the requirements of CEQA Guidelines Section 15130. As part of the impact analysis, LASHP DEIR found that the LASHP would have a less than significant impact on traffic and air quality, and would therefore not contribute to a new traffic and air quality significant impact as evaluated in the Original DEIR. The LASHP DEIR found that the impacts to noise would be significant and unavoidable as a result of temporary fireworks displays. However, such impacts would be temporary, would not be a direct result of the Proposed Alternative, and would not occur within the operation hours of the significant noise impacts evaluated in the Original DEIR, and therefore would not lead to a substantial increase in the severity of an existing impact as

previously evaluated in the Original DEIR. Comment will be forwarded to the decision maker.

RP8-21 The comment suggests that lack of specific detail about possible future water distribution facilities that may be necessary represents a deficiency and violation of CEQA guidelines. As mentioned in the Original DEIR it is unknown how existing water distribution facilities will be incorporated with development resulting from the Proposed Alternative. This is due to the fact that the EIR is a programmatic document and there are no specific development projects proposed at this time. As stated on page 15-7 in the Original DEIR any new conveyance facilities that may be necessary “will be subject to the terms of the WSA and the mitigation measures” detailed in the DEIR.

RP8-22 The comment alleges impacts upon public services are not adequately analyzed and there is no discussion of public service impacts related to population growth. The comment also argues potential impact conclusions detailed in Chapter 14, section 14.3.2.2 are not supported by adequate evidence. Please see Response to Comment 27-122a and 27-122c.

RP8-23 The comment argues that since the EIR does not discuss specific, possible industrial uses that might locate within the project area this allows for possible cumulative TAC emission hazards to develop. The EIR is a programmatic document and there are no specific development projects proposed at this time, discussion of specific, possible future projects in the project area would be remote and speculative. Future applicants will need to demonstrate that the project property satisfies the prevailing standards and mitigations set forth in the Proposed. The comment also claims SCAQMD regulations cannot adequately address cumulative impacts but provides no facts, reasonable assumption based on facts, or expert opinion supported by facts attesting to the claim.

RP8-24 The comment states that the odor analysis of the DEIR is defective since no specific, possible future odor-producing sources are included in the analysis. The EIR is a programmatic document and there are no specific development projects proposed at this time, discussion of specific, possible future projects in the project area would be remote and speculative. Future applicants will need to demonstrate that the project property satisfies the prevailing standards and mitigations set forth in the Proposed Alternative.

RP8-25 The comment argues the discussion of Alternatives in Chapter 17 are lacking in sufficient detail. The discussion of Alternatives is outside the scope of the RP-DEIR. The comment also does not provide any facts that would be considered as new information. Please refer to the above General Response to Comments Received on the RP-DEIR for a discussion on the City’s obligation to respond to comments outside the scope of the RP-DEIR, and the standards for recirculation of a Draft EIR due to “significant new information.”

RP8-26 The comment states the EIR must be revised as detailed in previous comments and must be recirculated. The comments do not present any facts, or evidence based on facts that there is “significant new information” that would warrant recirculation pursuant to Section 15088.5 (a) of the CEQA Guidelines.

RP-9. Joyce Dillard, July 16, 2012

RP9-1 The comment states: “Your re-circulation fails to identify the pollutants associated with Air Quality, Greenhouse Gas Emissions and Transportation.” The RP-DEIR specifically addresses Air Quality in section 2.A, GHG Emissions in 2.B, and Transportation in 2.D as addendum to Chapters 4 (Transportation), 11 (Air Quality), and 16 (Energy and Greenhouse Gas Analysis) in the Original DEIR. Because there is no statement concerning any specific analyses or findings in the Original DEIR or RP-DEIR, no further response can be provided.

RP9-2 The comment states: “Not discussed is the Fracking of Oil Wells in or around the Specific Plan, its effects on geology and subsidence, air quality and water including but not limited to NPDES permitting and TDML Total Daily Maximum Loads.” See Response to Comment 37-8 and 37-11.

RP9-3 The comment states analysis of methane and other gases as contributors to climate change and sea level rise should be included in the EIR. See Response to Comment 37-14.

RP9-4 The comment states there is no Circulation Element as required by California state law. A Circulation Element is required for a General Plan, not a Specific Plan.

RP9-5 The comment claims air quality analysis and mitigations are missing. Current air quality, the location and extent of existing monitoring stations, and Significance Thresholds are all discussed in Chapter 11 of the Original DEIR. Further several air quality mitigation measures were added with the RP- DEIR. See Section 2.A of the RP-DEIR.

RP9-6 The comment states: “Missing is data available such as the LA County storms data and pollutant loads.” Because the commenter does not characterize or explain the issues raised and there is no statement concerning any specific analyses or findings in the Original DEIR or RP-DEIR, no further response can be provided.

RP9-7 The comment states: “There is not mention of any jurisdictional responsibilities with CALTRANS MS4 or NPDES permitting.” Because the commenter does not characterize or explain the issue raised and there is no statement concerning any specific analyses or findings in the Original DEIR or RP-DEIR, no further response can be provided.

RP9-8 The comment is in regards to underground storage tank leakage. See Response to Comment 37-8.

RP9-9 The comment regards TMDLs, groundwater basins, and Southern California Bight. See Responses to Comments 37-11, 37-14, and 37-15.

RP9-10 The comment states that water supply and geology and soils need to be addressed. See Responses to Comments 37-9, 37-13, and 37-15.

RP9-11 The comment states: “You have not addressed Wetlands Mitigation Banking or any stream restoration.” Because the commenter does not characterize or explain the issues raised and there is no statement concerning any specific analyses or findings in the Original DEIR or RP-DEIR, no further response can be provided.

RP9-12 The comment states: “You have not addressed the Sediment Management needs, where and how to mitigate.” Because the commenter does not characterize or explain the issue raised and there is no statement concerning any specific analyses or findings in the Original DEIR or RP-DEIR, no further response can be provided.

RP9-13 The comment suggests the Migratory Bird Treaty Act should be discussed. Page 8-8, section 8.3.2.1 discusses the significance of the Migratory Bird Treaty Act in relation to the Proposed Alternative.

RP9-14 The comment asks if there are any plans to build affordable housing on public facility owned property. The EIR is a programmatic document and there are no specific development projects proposed at this time so any discussion of possible future public/private development partnerships would be remote and speculative.

RP9-15 In regards to the LATC Railyard the comment asks what measures are being taken in regards to air quality and suggests water quality issues have not been addressed. Air quality issues related to the LATC Railyard are specifically addressed in the RP-DEIR section 2. Additionally it is indicated in Chapter 7 of the Original DEIR, Hydrology and Water Quality, that groundwater flows north to south below the project area and therefore the LATC does not impact groundwater quality in the project area.

RP9-16 The comment is substantially the same as 37-6. See Response to Comment 37-6.

RP9-17 The comment states: “You fail to address Public Health and Safety monitoring, testing, data collecting and enforcement.” Because the commenter does not characterize or explain the issue raised and there is no statement concerning any specific analyses or findings in the Original DEIR or RP-DEIR, no further response can be provided.

Figures

Figure RC 1 Wind Analysis

Figure RC 2 Wind Analysis Rose Diagram Detailed

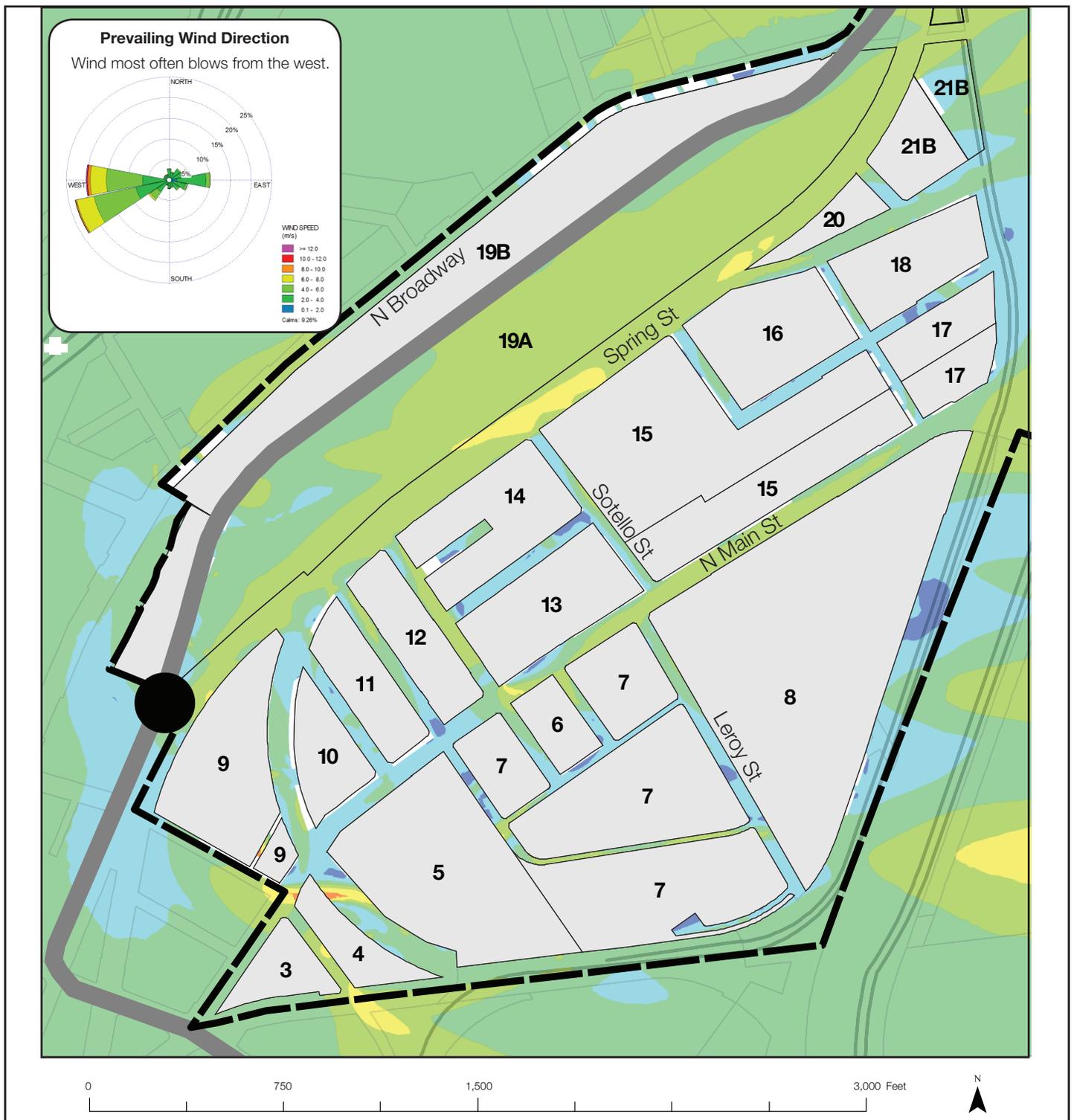


Figure RC-1
Wind Analysis

Cornfield Arroyo Seco Specific Plan Final EIR

May 3, 2012

ARUP

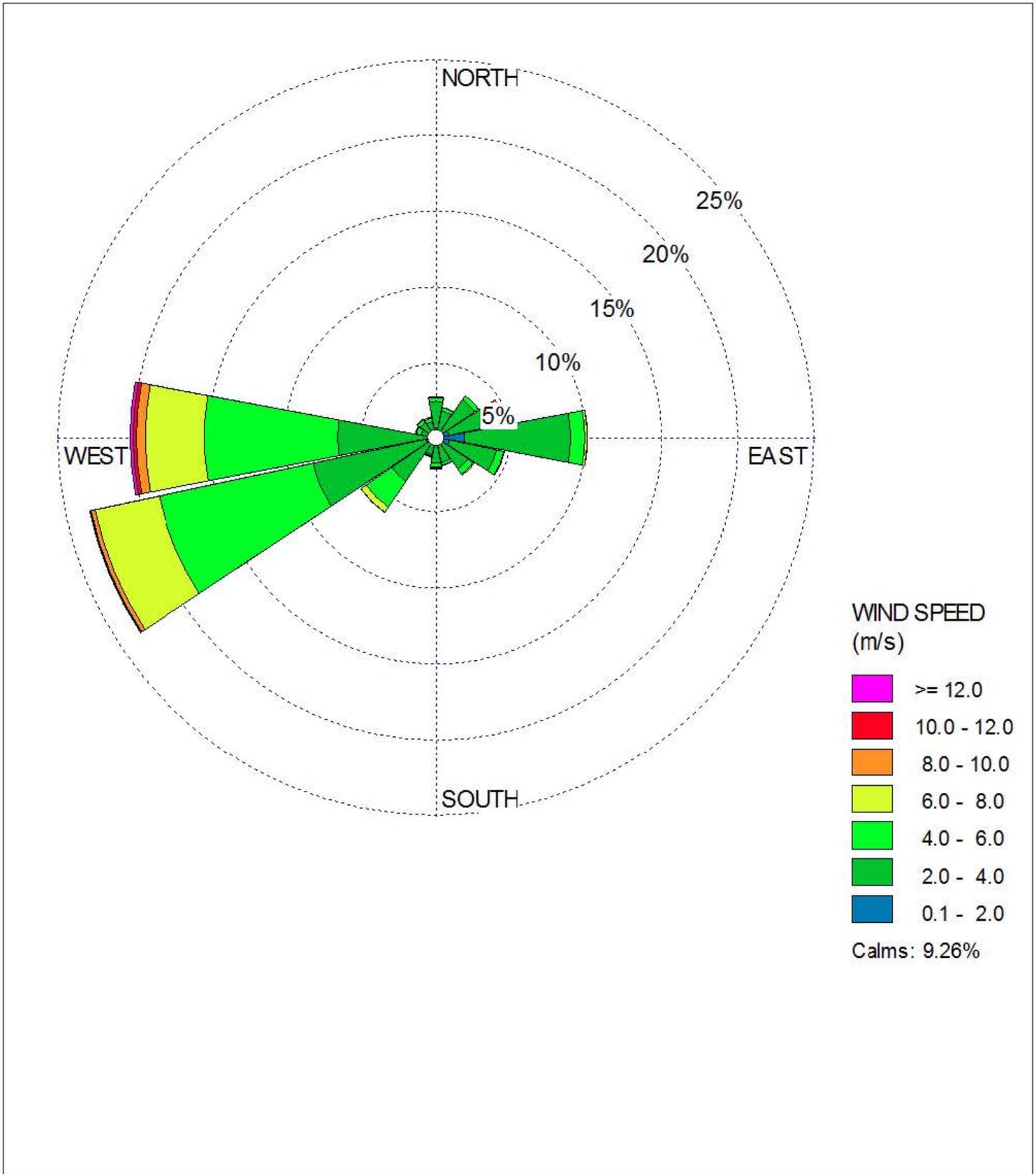
Criteria to describe the levels of windiness

The acceptability of windiness is subjective and depends on a number of factors, most notably the activities to be performed in the area being assessed. The Lawson Criteria describe acceptability for particular activities in terms of 'comfort' and 'distress' (or safety). Acceptable conditions for various activities in order of increasing windiness are described in the Table below.

Comfort Criteria	Description
Long periods of sitting	Reading a newspaper and eating and drinking
Periods of standing / sitting	Appropriate medium-length wait at for bus stops, and building entrances
Short periods of standing	Appropriate for short waits at bus stops, and building entrances
Strolling / Window shopping	General areas of walking and sightseeing, window shopping
Fast / Business Walking	Local areas around tall buildings where people are not expected to linger

Comfort criteria as defined by TV Lawson

The conditions described above are the limiting criteria for comfort. For ideal conditions the windiness will be a category better than outlined above. For more sensitive activities, such as regular use for external eating, conditions should be well within the 'Sitting' category.



Source
Arup North America Ltd, 2012.

Figure RC-2
Wind Analysis
Rose Diagram Detailed
Cornfield Arroyo Seco Specific Plan Final EIR

September 6, 2011

4.0 CORRECTIONS AND ADDITIONS

CEQA Guidelines Section 15088.5 requires:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice of its availability ... “Significant new information” requiring recirculation include, for example, a disclosure showing that:
 - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes the insignificant modification in an adequate EIR.
- (c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.
- (d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.
- (e) A decision not to recirculate and EIR must be supported by substantial evidence in the administrative record.

In response to public comments received as well as staff-initiated text changes, Corrections and Additions have been made to the Original DEIR and the RP-DEIR. Also, additional information has been suggested in comments to both the Original DEIR and the RP-DEIR and responded to in Chapter 3 of this Final EIR. All of the public comments to the Original DEIR and the RP-DEIR as well as the Corrections and Additions to the Original DEIR and the RP-DEIR have been carefully reviewed to determine whether additional recirculation of either the Original DEIR and/or the RP-DEIR is required. All of the new information in this Corrections and Additions section of the Original DEIR and/or the RP-DEIR, in the comments, and in the responses to comments, merely clarifies or amplifies or makes insignificant modifications to the analysis contained in both the Original DEIR and the RP-DEIR (Combined DEIR). Therefore, the Combined DEIR need not be recirculated prior to certification.

Corrections and additions to the Original DEIR are presented first followed by corrections and additions to the RP-DEIR. Topics are presented in the same sequence in which they were ordered in the original Original or RP-DEIR. If there are changes that apply to a section as a whole they are presented first under the sub-heading Section-wide changes. Changes that apply only to specific circumstances are listed next under the sub-heading Specific changes. In general in the following corrections and additions, new text is underlined, and deleted text is shown in strikeout font.

Since the publication of the Original DEIR there has been a dissolution of Redevelopment Agencies statewide, consequently there is no longer a Redevelopment Plan component of the Proposed Alternative. All references to the Redevelopment Plan as a component of the Proposed Alternative in the Original DEIR are assumed redacted from the FEIR. References to the Redevelopment Agency that require a change in the text beyond a simple deletion are listed among the corrections that follow.

Further, except for references in chapter headings, references to “Specific Plan” are assumed changed to “Project Alternative.” If a change in text beyond a simple substitution is required it will be listed among the corrections that follow.

ORIGINAL DEIR

EXECUTIVE SUMMARY

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page S-1, section S.11, first and third paragraphs; Page S-5, Figure S-1; Page S-9, section S.5, second paragraph; Page S-13, Figure S-2.

All instances of “Specific Plan” in the following locations have been replaced with “Proposed Alternative”: Page S-1, section S.1, third paragraph and fourth paragraph; Page S-6, section S.4.1, second paragraph; Page S-7, section S.4.1, first, second, and third paragraph; Page S-8, section S.4.1, first paragraph, two instances; Page S-8, section S.4.2, second paragraph, two instances; Page S-12, section S.6.2, first and last sentences.

Specific changes:

Page S-2, section S.2.1, under the subheading Geography and Infrastructure, “lower Los Angeles River Watershed” is changed to “Upper Los Angeles River Watershed sub-Region.”

Page S-2, section S.2.1, under the subheading Geography and Infrastructure, in the third paragraph “The Pasadena Freeway/State Route 110 (SR110)” is changed to “The Arroyo Seco Parkway/State Route 110 (SR110, aka Pasadena Freeway).”

Page S-3, section S.2.2, under the subheading Demographics, first paragraph, the second and fourth sentences are revised as follows:

The total number of ~~households~~ dwelling units within these four tracts was 4,358 (or ~~13,235~~ 16,091 persons) in 2007.... As of 2007, there were an estimated ~~1,814~~ 1,448 housing units within the Project Area.

Page S-3, section S.2.2, under the subheading Demographics, third paragraph, the first sentence is revised as follows:

The average household income, \$35,678, is ~~significantly~~ lower than the citywide average, ~~\$58,724, based upon 2000 dollars~~ \$36,687, based upon 1999 dollars.

Page S-3, section S.2.2, under the subheading Demographics, the first paragraph, the second and fourth sentences are revised as follows:

The total number of ~~households~~ dwelling units within these four tracts was 4,358 (or ~~13,235~~ 16,091 persons) in 2007.

As of 2007, there were an estimated ~~1,814~~ 1,448 housing units within the Project Area.

Page S-3, section S.2.3, under the subheading Land Use, first paragraph, the third sentence is revised as follows:

As of 2007 it was estimated that there were ~~1,814~~ 1,448 housing units and ~~8,636~~ 2,908 jobs within the ~~Project~~ Area.

Page S-6, section S.3, under the subheading Project Need, the second paragraph is revised as follows:

The Project Area's location and amenities make it a natural location for housing and a mix of other uses; however, uncoordinated redevelopment may provide limited environmental and social benefit while resulting in the loss of valuable industrial land. Therefore, the development of the ~~Specific Plan component of the Proposed Alternative~~ was undertaken to provide a framework for creating an environmentally sustainable, inclusive, and economically viable area. Policies included in the ~~Specific Plan~~ Proposed Alternative are intended to accommodate a range of housing options, new public spaces, opportunities for walking and bicycling, and clusters of development for both existing industrial businesses and the new technology businesses of the future. ~~The Redevelopment Plan is intended as a mechanism for helping to achieve the goals of the Specific Plan.~~

Page S-6, section S.4, under the subheading Community Planning Process, the first paragraph is revised as follows:

A community-based planning process has been a critical component in creating the ~~Specific Plan and Redevelopment Plan that make up the Proposed Development Alternative~~ and initiating this environmental analysis. More than five workshops have been conducted during the development of the ~~Specific Plan~~ Proposed Alternative in order to ensure maximum input from a wide range of stakeholders. The following timeline outlines this process.

Page S-8, section S.4.1, under the subheading Public Workshops, the third sentence is revised as follows:

“This meeting was intended to introduce the concept of the Redevelopment Plan and to update progress on the ~~Specific Plan~~ Proposed Alternative (since the publication of the Draft EIR there has been a dissolution of Redevelopment Agencies statewide, consequently there is no longer a Redevelopment Plan component of the Proposed Alternative).”

Page S-9, section S.5, under the subheading Environmental Analysis Framework, the last sentence of the second paragraph is revised as follows:

The No Project Alternative reflects the anticipated growth based upon existing land uses permitted in the Project Area, and the Proposed Alternative reflects the policies and proposed land use changes that would result from the proposed land use and other changes set forth in the Specific Plan ~~component of the Proposed Alternative~~

Page S-9, section S.6, under the subheading Description of the Proposed Alternative, the paragraph is revised as follows:

The Proposed Alternative has been developed based upon careful consideration of the characteristics of the Project Area, potential opportunities and constraints, historical context, regional context, market realities, future sustainability, accessibility, and other planning considerations. The Proposed Alternative would involve implementing ~~two plans: The Cornfield Arroyo Seco Specific Plan and the corresponding Redevelopment Plan. While the Redevelopment Plan does not propose any land use changes, the Specific Plan does.~~ which proposes land use changes. The elements of ~~both the plans~~ both the plans are summarized below and described in more detail in Chapter 2 of the ~~Draft~~ Final EIR.

Page S-12, section S.6.2, the subheading is revised from “Specific Plan” to “Proposed Alternative Objectives.”

Page S-14, section S.6.3. This section is eliminated in its entirety.

Page S-15, section S.6.4.2, under the subheading Other Alternatives Considered, the first paragraph is revised as follows:

~~Three~~ Two other alternatives were considered and evaluated during the development of the Proposed Alternative: the Modified Project Alternative, and the Reduced Project Standards Alternative, ~~and the No Redevelopment Plan Alternative~~. These alternatives are evaluated in Chapter 17 of the ~~Draft~~ Final EIR.

Page S-16, section S.6.4.5, subheading No Redevelopment Plan Alternative, This section is eliminated in its entirety.

Page S-17, section S.8, under the subheading Environmental Analysis Results, the third paragraph is revised as follows:

Table S-6 presents the environmental analysis results when comparing the Proposed Alternative to the Modified Project Alternative, and the reduced Project Standards Alternative, ~~and the No Redevelopment Plan Alternative.~~

1. INTRODUCTION

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 1-1, section 1.1, first paragraph; Page 1-2, Figure 1-1; Page 1-3, section 1.1, first paragraph; Page 1-7, section 1.4, first sentence.

All instances of “Specific Plan” in the following locations have been replaced with “Proposed Alternative”: Page 1-3, section 1.1, items five and six; Page 1-7, section 1.4, first paragraph, two instances; Page 1-7, section 1.4.1, second, third, and fourth paragraphs; Page 1-8, section 1.4.2, second paragraph, two instances.

Specific changes:

Page 1-1, section 1.1, under the subheading Introduction, the last paragraph is redacted in its entirety.

Page 1-4, section 1.2.1, under the subheading Geography and Infrastructure, in the third paragraph “The Pasadena Freeway/State Route 110 (SR110)” is changed to “The Arroyo Seco Parkway/State Route 110 (SR110, aka Pasadena Freeway).”

Page 1-5, section 1.2.2, under the subheading Demographics, first paragraph, the second and fourth sentences are revised as follows:

The total number of ~~households~~ dwelling units within these four tracts was 4,358 (or ~~13,235~~ 16,091 persons) in 2007.... As of 2007, there were an estimated ~~1,814~~ 1,448 housing units within the Project Area (City of Los Angeles, 2008a).

Page 1-5, section 1.2.2, under the subheading Demographics, third paragraph, the first sentence is revised as follows:

The average household income, \$35,678, is ~~significantly~~ lower than the citywide average of ~~\$58,724, based upon 2000 dollars~~ \$36,687, based upon 1999 dollars.

Page 1-5, section 1.2.3, under the subheading Land Use, first paragraph, the third sentence is revised as follows:

As of 2007 it was estimated that there were ~~1,814~~ 1,448 housing units and ~~8,636~~ 2,908 jobs within the ~~p~~Project ~~a~~Area.

Page 1-6, section 1.3, under the subheading Project Need, the last sentence is redacted.

Page 1-7, section 1.4, the subheading is changed to “Proposed Alternative Planning Process.”

Page 1-8, section 1.4.1, under the subheading Public Workshops, second paragraph, third sentence is revised as follows:

“This meeting was intended to introduce the concept of the Redevelopment Plan and to update progress on the ~~Specific Plan~~ Proposed Alternative (since the publication of the Draft EIR there has been a dissolution of Redevelopment Agencies statewide consequently there is no longer a Redevelopment Plan component of the Proposed Alternative).”

2. PROJECT DESCRIPTION

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 2-1, section 2, first and third paragraphs; Page 2-16, Figure 2-1; Page 2-21, Figure 2-3; Page 2-25, Figure 2-4.

All instances of “Specific Plan” in the following locations have been replaced with “Proposed Alternative”:

- Page 2-13, section 2.2.1, the subheading and the first sentence;
- Page 2-13, section 2.2.1.1, first sentence;
- Page 2-14, section 2.2.1.2, first sentence;
- Page 2-14, section 2.2.1.3, first sentence;
- Page 2-15, section 2.2.1.3, first sentence at the top of the page, the sentence following that, and the second paragraph;
- Page 2-17, section 2.2.1.4, first paragraph, three instances;
- Page 2-18, section 2.2.1.5, first sentence;
- Page 2-18, section 2.2.1.6, last paragraph, first sentence;
- Page 2-22, section 2.2.1.7, first paragraph, two instances;
- Page 2-22, section 2.2.1.8, first paragraph;
- Page 2-23, section 2.2.1.9, first paragraph, two instances;
- Page 2-23, section 2.2.1.10, first paragraph.

Specific Changes:

Page 2-1, section 2.2, under the subheading Proposed Alternative, the paragraph is revised as follows:

The Proposed Alternative has been developed based upon careful consideration of the characteristics of the Project Area, potential opportunities and constraints, historical context, regional context, market realities, future sustainability, accessibility, and other planning considerations. The Proposed Alternative would involve implementing ~~two plans: The Cornfield Arroyo Seco Specific Plan and the corresponding Redevelopment Plan. While the Redevelopment Plan does not propose any land use changes, the Specific Plan does.~~ which proposes land use changes. In addition, the Proposed Alternative includes the adoption of a new Hybrid Industrial General Plan Land Use category for a majority of the plan area. The elements of ~~both~~ the plans are explained in more detail throughout the rest of this chapter.

Page 2-13, section 2.2.1.1, under the subheading Program Assumptions, Table 2-2 is revised as follows:

Table 2-2 Program Assumptions

	Proposed Alternative (2035)	No Project Alternative (2035)	Current (2003 2007)
Population	31,855	5,512	4,802 <u>5,304</u>
Jobs	10,546	7,940	6,794 <u>2,908</u>
Dwelling Units	8,776	1,635	4,266 <u>1,448</u>
Residential (square feet)	10,844,830	2,020,544	1,683,787
Retail (square feet)	508,425	312,961	297,173
Commercial/Office (square feet)	1,702,147	229,193	170,127
Light Industrial/Research and Development (square feet)	6,571,654	2,076,341	1,872,275
Institutional Uses (square feet)	200,000	136,180	123,800
Parks and Open Space (acres)	69	46	17

Page 2-13, section 2.2.1.1, under Table 2-2 the following text is added:

Based upon these growth projections the Proposed Alternative is expected to generate an additional population of 25,551 persons, 7,638 more jobs, and 7,328 additional housing/dwelling units which will require an additional 9,161,043 square feet of residences, 1,532,020 square feet of commercial/office space, 4,699,379 square feet of light industrial/research and development space, 76,200 square feet of institutional uses, and 52 more acres of park area.

Pages 2-26, 2-27, section 2.2.2 is redacted in its entirety.

3. LAND USE

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 3-1, section 3.1, second paragraph; Page 3-3, Figure 3-1; Page 3-5, Figure 3-3; Page 3-6, Figure 3-4; Page 3-8, Figure 3-6; Page 3-11, Figure 3-7; Page 3-12, Figure 3-8; Page 3-13, Figure 3-9; Page 3-18, Figure 3-10; Page 3-22, figure 3-11; Page 3-23, Figure 3-12; Page 3-24, Figure 3-13.

Specific changes:

Page 3-2, section 3.1, under the subheading Existing Conditions, last paragraph, the second, fourth, and last sentences are revised as follows:

The total number of ~~households~~ dwelling units within these four tracts was 4,358 (or ~~43,235~~ 16,091 persons) in 2007.... As of 2007, there were an estimated ~~1,814~~ 1,448 housing units within the Project Area.... The average household income, \$35,678, was

significantly lower than the city-wide average of \$58,724 (based upon 2000 dollars) \$36,687 (based upon 1999 dollars).

Page 3-7, section 3.1, under the subheading Existing Conditions, second paragraph, first sentence, “single family neighborhood” is changed to “low-density neighborhood.”

Page 3-10, section 3.1.2.3 is redacted in its entirety.

Page 3-17, Table 3-1, the Total in column Central City North should be 233 and not ~~243~~.

Page 3-26, section 3.3.1, under the subheading Assumptions, three instances of “Specific Plan component of the” are removed in each of the first three bulleted points. The fourth bullet point on page 3-26 is removed entirely.

Page 3-27, section 3.3.1, under the subheading Assumptions, “Specific Plan component of the” is removed from the final bullet point.

Page 3-27, section 3.3.2.2, under the subheading Potential Land Use Impacts of the Proposed Alternative That Are Less Than Significant, “Specific Plan component of the” is removed from the second paragraph.

4. TRANSPORTATION

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 4-1, first paragraph; Pages 4-11,13, 15, Figure 4-3; Page 4-22, Figure 4-4; Page 4-23, Figure 4-5; Page 4-24, Figure 4-6; Page 4-29, Figure 4-7; Pages 4-31,33, 35, figure 4-8; Pages 4-37, 39, 41, Figure 4-9.

All instances of “Specific Plan” in the following locations have been replaced with “Proposed Alternative”: Page 4-50, section 4.3.2.2, under the subheading Bicycle/Pedestrian System, second and third paragraphs.

Specific Changes:

Page 4-1, section 4.1.1.1, under the subheading Freeways and Ramps, the list of ramps for Golden State Freeway/Interstate Highway 5 (I-5) is revised to:

Ramps in the study area provide access to/from Mission Road, Marengo Street, Daly Street, Avenue 21/Main Street, North Broadway, Pasadena Avenue, and West Avenue 26.

Page 4-1, section 4.1.1.1, under the subheading Freeways and Ramps, the second paragraph is revised as follows:

~~Pasadena Freeway~~ Arroyo Seco Parkway/State Route 110 (SR110, aka Pasadena Freeway) runs in a north-south direction through the study area and extends from its southern terminus in North San Pedro to its northerly terminus in ~~South~~ Pasadena. The ~~Pasadena Freeway~~ Arroyo Seco Parkway generally provides three lanes in each direction through the study area. Ramps located in the study area provide access to/from Figueroa Street, Amador Street, Solano Avenue/Casanova Street, Hill Street, Bishop Road/Stadium Way, and West Avenue 26.

Page 4-1, section 4.1.1.1, under the subheading Freeways and Ramps, the third paragraph is revised as follows:

Santa Ana Freeway (US-101) runs in an east-west direction ~~south~~ through the southerly portion of the study area and extends from its southern terminus at I-5 in East Los Angeles and ultimately proceeds northwest along the California coast. The Santa Ana Freeway generally provides three lanes in each direction through the study area. Ramps in the study area provide access to/from Pleasant Avenue, Vignes Street, Commercial Street, Alameda Street, Grand Avenue, Broadway and Spring Street, Mission Road, and Temple Street.

Page 4-2, section 4.1.1.2, under the subheading Other Routes of Regional Significance and Local Roadways, the listing for North Broadway is revised as follows:

North Broadway is a Class II Major Highway that runs in an east-west direction with two lanes in each direction plus left-turn channelization at most intersections through the study area. ~~Parking is generally allowed along most of North Broadway~~ North Broadway has peak period parking restrictions westbound during the AM peak period, and eastbound during the PM peak period, and the posted speed limit is 15 miles per hour.

Page 4-2, section 4.1.1.2, under the subheading Other Routes of Regional Significance and Local Roadways, the listing for North Spring Street is revised as follows:

North Spring Street is a Class II Major Highway that runs in an east-west direction with two lanes in each direction through the study area. ~~Parking is generally not allowed along most of North Spring Street.~~ Parking is generally prohibited on the west side of North Spring Street, and is allowed along portions of the east side of North Spring Street, except during the PM peak period, when parking is prohibited, and the posted speed limit ranges from 30 to 35 miles per hour.

Page 4-2, section 4.1.1.2, under the subheading Other Routes of Regional Significance and Local Roadways, the listing for North Main Street is revised as follows:

North Main Street is a Secondary Highway that runs in an east-west direction with two lanes in each direction through the study area. ~~Parking is generally not allowed along most of North Main Street~~ along North Main Street is variable, with parking allowed along many sections of North Main Street, with peak period parking restrictions implemented in some locations, and the posted speed limit is 35 miles per hour.

Page 4-2, section 4.1.1.2, under the subheading Other Routes of Regional Significance and Local Roadways, the listing for San Fernando Road is revised as follows:

San Fernando Road is a Secondary Highway south of the intersection of San Fernando Road and Avenue 26, and is a Major Highway Class II north of this intersection. ~~that It~~ runs in a north-south direction with two lanes in each direction through the study area. ~~Parking is generally allowed along most of San Fernando Road~~ Parking is variable on San Fernando Road, and the posted speed limit is 35 miles per hour.

Page 4-2, section 4.1.1.2, under the subheading Other Routes of Regional Significance and Local Roadways, the listing for Avenue 26 is revised as follows:

Avenue 26 is a Secondary Highway that runs in a north-south direction with two lanes in each direction through the study area. Parking is generally allowed along most of Avenue 26, except for certain sections, where parking is prohibited during peak periods. During off-peak periods, Avenue 26 operates as one lane in a particular direction in some locations, and two lanes in others. During peak periods, it operates as two lanes in each direction within the Study Area. The posted speed limit is 35 miles per hour.

Page 4-2, section 4.1.1.2, under the subheading Other Routes of Regional Significance and Local Roadways, the listing for Daly Street is revised as follows:

Daly Street is a Secondary Highway that runs in a north-south direction with two lanes in each direction through most of the study area. Parking is generally allowed along most of Daly Street, except between Mission Road to just south of Main Street where it is prohibited, and the posted speed limit is 30 miles per hour.

Page 4-3, section 4.1.1.3, under the subheading Intersections, the following revisions are made:

20. ~~South North~~ Avenue 18 and North Spring Street/North Broadway
29. South Avenue ~~20~~ 19 and North Main Street
30. South Avenue ~~24~~ 20 and North Main Street (unsignalized)
34. North Mission Road and East Cesar E. Chavez Avenue
35. North Mission Road and Daly Street/Marengo Street
36. North Mission Road and Griffin Avenue/Zonal Avenue
37. North Mission Road and Valley Boulevard
38. North State Street and Marengo Street
39. North Hope Street/SR 110 and SR 101 Southbound Off-Ramps and West Temple Street
40. North Grand Avenue and West Cesar Chavez Avenue
41. North Broadway and West Cesar E. Chavez Avenue
42. North Hill Street and Alpine ~~Avenue~~ Street
43. North Broadway and Alpine ~~Avenue~~ Street

Page 4-8, Table 4-3: Intersection Traffic Operations-Existing (2009) Conditions is partially replaced by Table 4-3 in the Figures section at the rear of this chapter.

Page 4-10, section 4.1.2, under the subheading Signalized Study Intersections, items 34 and 41 are revised as follows:

- 34. Intersection North Mission Road and East Cesar E. Chavez Avenue (LOS F in AM)
- 41. Intersection North Broadway and West Cesar E. Chavez Avenue (LOS E in PM)

Page 4-11, Figure 4-3, is partially replaced by Figure 4-3 in the Figures section at the rear of this chapter.

Page 4-13, section 4.1.4, figure 4-3, the following text revisions are made:

- 20. S ~~N~~ Avenue 18 & N Spring St/N Broadway
- 29. S Avenue ~~20~~ 19 & N Main St
- 30. S Avenue ~~21~~ 20 & N Main St

Page 4-15, section 4.1.4, figure 4-3, the following text revisions are made:

- 34. N Mission Rd & E Cesar E. Chavez Av
- 35. N Mission Rd & Daly St/Marengo St
- 36. N Mission Rd & Griffin Av/Zonal Av
- 37. N Mission Rd & Valley Blvd
- 38. N State St & Marengo St
- 39. N Hope St & W Temple St
- 40. N Grand Av & W Cesar Chavez Av
- 41. N Broadway & W Cesar E. Chavez Av
- 42. N Hill St & Alpine ~~Av~~ St
- 43. N Broadway & Alpine ~~Av~~ St

Page 4-19, section 4.3.1.4, under the subheading Onsite Roadway Sizing Analysis, Scenario C is revised as follows:

Scenario H - Scenario G with North Spring Street as a four-lane facility and peak period parking restrictions on Avenue 26 removed between Pasadena Avenue and the Lincoln Heights/Cypress Park Metro Gold Line Station to accommodate bike lanes

Page 4-24, section 4.3.1.5, Figure 4-6, the legend for 4-Lane Roadway with Reduced Auto Capacity is revised to read; 4-Lane Roadway with Reduced Auto Capacity due to Lane Narrowing, Wider Sidewalks, and Bicycle Lanes.

Page 4-26, section 4.3.1.7, Table 4-6: Intersection Traffic Operations-Cumulative (2035) Conditions is partially replaced by Table-4-6 (Partial) in the figures section at the rear of this chapter.

Page 4-29, section 4.3.1.7, Figure 4-7, The section of Avenue 26 between Figueroa Street and Lacy Street is shaded yellow to indicate a bicycle route. The section of Avenue 20 between Broadway and Main Street is shaded yellow to indicate a bicycle route. The section of N. Broadway between S. Avenue 18 and I-5 is shaded yellow to indicate a bicycle route including signage and roadway markings as permitted for a Major Class Roadway with peak hour lanes until which time a Bicycle Lane can be accommodated in this section of roadway as envisioned by the 2010 Bicycle Plan.

Page 4-29, Figure 4-7 is revised to include the additional bicycle routes on Avenue 26, Avenue 20, and Broadway. See Figure 4-7 in the figures section at the rear of this chapter.

Page 4-33, section 4.3.1.7, figure 4-8, the following text revisions are made:

20. ~~S N~~ Avenue 18 & N Spring St/N Broadway
29. S Avenue ~~20~~ 19 & N Main St
30. S Avenue ~~21~~ 20 & N Main St

Page 4-35, section 4.3.1.7, figure 4-8, the following text revisions are made:

34. N Mission Rd & E Cesar E. Chavez Av
35. N Mission Rd & Daly St/Marengo St
36. N Mission Rd & Griffin Av/Zonal Av
37. N Mission Rd & Valley Blvd
38. N State St & Marengo St
39. N Hope St & W Temple St
40. N Grand Av & W Cesar Chavez Av
41. N Broadway & W Cesar E. Chavez Av
42. N Hill St & Alpine ~~Av~~ St
43. N Broadway & Alpine ~~Av~~ St

Page 4-43, section 4.3.2.1, under the subheading Potentially Significant Transportation Impacts of the Proposed Alternative, the following revisions are made:

- Intersection 34: North Mission Road and East Cesar E. Chavez Avenue
- Intersection 35: North Mission Road and Daly Street/Marengo Street
- Intersection 40: North Grand Avenue and West Cesar Chavez Avenue
- Intersection 41: North Broadway and West Cesar E. Chavez Avenue
- Intersection 42: North Hill Street and Alpine ~~Avenue~~ Street
- Intersection 43: North Broadway and Alpine ~~Avenue~~ Street

Page 4-46, section 4.3.2.1, table 4-7, the following revisions are made:34. North Mission

- Road & East Cesar E. Chavez Avenue
- 35. North Mission Road & Daly Street/Marengo Street
- 40. North Grand Avenue & West Cesar Chavez Avenue
- 41. North Broadway & West Cesar E. Chavez Avenue
- 42. North Hill Street & Alpine ~~Avenue~~ Street
- 43. North Broadway & Alpine ~~Avenue~~ Street

Page 4-47, section 4.3.2.1, under the subheading Mitigation Measure Transportation 4.1, the item Rideshare or Carshare Parking is revised as follows:

Residential Projects or those portions of Mixed-Use Projects that are residential and provide parking shall provide, in a publicly accessible area, one shared vehicle parking space for every 25 units and Nonresidential Projects....

Page 4-47, section 4.3.2.1, under the subheading Mitigation Measure Transportation 4.1, the item Transit Pass Subsidy is revised as follows:

Transit Pass Subsidy – A transit pass subsidy has the potential to be an effective TDM strategy for the Project Area’s employees. Metro, LADOT, and Santa Clarita Transit provide good levels of public transit service in the Project Area. ~~For employers, the most efficient way to incentivize the use of transit is to subsidize monthly transit passes. To do this, employers~~ Projects that comprise of over 50 dwelling units, 50,000 square feet of commercial floor area, and over 100,000 square feet of industrial floor area shall participate in a employer subsidized transit pass program and to subsidize a percentage or all of the costs of a monthly transit pass. Metro currently offers a bulk rate transit pass program (B-Tap) that gives substantial discounts to participating businesses, and is considering expanding the program for residential uses. Contact Metro Commuter Services (213) 922-2811 for more information on the bulk rate transit pass program (B-Tap).

Page 4-48, section 4.3.2.1, under the subheading Unsignalized Intersections Recommended to be Signalized, the following revision is made:

South Avenue ~~24~~ 20 and North Main Street (intersection #30)

Page 4-49, section 4.3.2.1, under the subheading Recommendations for Signalization, second group of bulleted items, the following revisions have been made:

- ~~Spring Street and Wilhardt Street~~ and North Spring Street
A traffic signal will be installed at the intersection of ~~Spring Street and Wilhardt Street~~ and North Spring Street as part of the Spring Street Bridge project.
- North Spring Street and Mesnagers Street...
- North Spring Street and Sotello Street
A traffic signal will be installed at the intersection of North Spring Street and Sotello Street as part of the Los Angeles State Historic Park project.
- Wilhardt Street and North Spring Street...

Page 4-50, section 4.3.2.2, under the subheading Emergency Access, “Specific Plan Component of the” is removed from the first paragraph.

Page 4-51, section 4.3.2.3, under the subheading Vehicle Miles Traveled Results, the paragraph below table 4-8 is revised as follows:

As shown in ~~Table 4-7~~ Table 4-8, the Proposed Alternative would generate approximately... Once this step is taken, the Proposed Alternative’s true impact on VMT on Los Angeles County Roadways is a reduction of approximately 296,000 VMT, a 0.26 percent reduction, as shown in ~~Table 4-8~~ Table 4-9.

5. VISUAL RESOURCES

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 5-1, first paragraph; Page 5-5, Figure 5-1; Page 5-6, Figure 5-2.

All instances of “Specific Plan” in the following locations have been replaced with “Proposed Alternative”: Page 5-18, section 5.3.1, fifth paragraph, two instances.

Specific Changes:

Page 5-1, section 5.1.1, under the subheading Project Area Setting, “Pasadena /State Route 110 (SR110)” is changed to “Arroyo Seco Parkway/State Route 110 (SR110, aka Pasadena Freeway).”

Page 5-17, section 5.3.1, under the subheading Assumptions, “Specific Plan component of ” is removed from the second paragraph and the third and fifth bullet points.

Page 5-18, section 5.3.1, under the subheading Assumptions, “Specific Plan component of the” is removed from the top of the page, second, third, fourth, fifth, sixth, and seventh paragraphs.

Page 5-19, section 5.3.2.2, under the subheading Potential Visual Resources Impacts of the Proposed Alternative That Are Less Than Significant, “Specific Plan Component of the” is removed from the second paragraph.

Page 5-22, section 5.3.2.2, under the subheading Mitigation Measure Visual Resources 5, 3 hours is changed to 1.5 hours in the second paragraph.

Page 5-23a is added, consisting of Figure 5-15.

Page 5-23b is added, consisting of Figure 5-16.

Page 5-23c is added, consisting of Figure 5-17.

6. EARTH RESOURCES

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 6-3, Figure 6-1; Page 6-5, Figure 6-2; Page 6-5, Figure 6-3; Page 6-8, Figure 6-4; Page 6-9, Figure 6-5; Page 6-12, section 6.3, first paragraph.

Specific Changes:

Page 6-3, Figure 6-1, legend is corrected to include “Qof, Old alluvial-fan deposits, undivided.”

7. HYDROLOGY AND WATER QUALITY

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 7-1, section 7, first paragraph; Page 7-3, Figure 7-1; Page 7-4, Figure 7-2; Page 7-5, Figure 7-3; Page 7-9, Figure 7-5; Page 7-14, Figure 7-7; Page 7-15, Figure 7-8; Page 7-17, Figure 7-9; Page 7-28, Figure 7-11.

Specific Changes:

Page 7-14, Figure 7-7 is revised to include references to the San Fernando and Central Basins. See Figure 7-7 in the figures section at the rear of this chapter.

Page 7-30, section 7.3.2.2, under the subheading Treatment and Flow Attenuation for Parcels, “Specific Plan component of the” is removed from the first and second paragraphs.

Page 7-31, section 7.3.2.2, under the subheading Impact Hydrology and Water Quality 5, “Specific Plan component of the” is removed from the third paragraph.

Page 7-31, section 7.3.2.2, under the subheading Impact Hydrology and Water Quality 7, “Preferred Alternative” is replaced with “Proposed Alternative” in two instances.

8. BIOLOGICAL RESOURCES

Page 8-9, section 8.3.2.1, under the subheading Potentially Significant Biological Resources Impacts of the Proposed Alternative, items b and c are revised as follows:

- b. If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities ~~within 300 feet of suitable nesting habitat for the observed protected bird species until August 31; or,~~
- c. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, ~~clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed the qualified biological monitor shall develop a mitigation plan that includes a buffer appropriate to the specific species of bird as well as the type and degree of disturbance expected at the construction site. The mitigation plan and identified buffer shall remain in place until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.~~

9. CULTURAL RESOURCES

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 9-1, section 9.1, first paragraph.

Specific changes:

Page 9-10, section 9.1.5.8, under the heading Historic Resources Survey of the Project Area, the following sentence is added to the end of the first paragraph:

It should be noted that this survey represents an inventory of designated resources at a particular moment in time and as new resources may be included in the future this list is not to be considered to encompass a definitive list.

Page 9-14, section 9.1.6, under the subheading Scenic Roads and Highways, “The Pasadena Freeway/State Route 110 (SR110), also known as the Arroyo Seco Parkway” is changed to “Arroyo Seco Parkway/State Route 110 (SR110, aka Pasadena Freeway).”

Page 9-24, section 9.3.2.1, under the subheading Mitigation Measure Cultural Resources 2, the first bullet is revised to:

Prior to the issuance of any permit, the project shall obtain clearance from the ~~Department of Cultural Affairs~~ Cultural Heritage Commission and its staff at the Office of Historic Resources for the proposed work.

10. HAZARDOUS MATERIALS

Pages 10-7 and 10-8, section 10.1.2, under the subheading Existing Hazardous Materials and Wastes, the text following Table 10-2 to the end of page 10-8 is removed and replaced with the following:

10.1.2.1 National Priority List and EPA Superfund Sites

Three sites in the project area have been identified in the records as sites listed as a potential or confirmed hazardous waste site at which the EPA Superfund Program has some involvement (CERCLIS). The sites are as follows:

1. Jaybee Ajax Manufacturing, 301 West Avenue 26
2. Kennington Ltd, 3209 Humboldt Street
3. NI West Incorporated, 3011 Humboldt Street

The Jaybee Ajax site (see new Figure 10-5) is now owned by the Los Angeles Department of Water and Power (LADWP) and was previously the site of Jaybee Manufacturing Corporation amongst other industrial uses. The soils and groundwater at the site have been found to be contaminated and a voluntary cleanup operation is active. The site is not listed on the NPL.

The Kennington Ltd site (see new Figure 10-5) is located at the site of a previous battery manufacturing plant. The soils have been found to be contaminated with heavy metals, polychlorinated biphenyls (PCBs), Tetrachloroethylene (PCE) and Trichloroethylene (TCE). The latest online data resource (accessed in April 2012) state that a final Remediation Investigation Report has been reviewed and approved by the DTSC. The site is not listed on the NPL.

The Kennington site has certain site management requirements with the following land use restrictions:

- Day care center prohibited.
- Elderly day care center prohibited.
- No excavation of contaminated soils without agency review and approval.
- Maintaining Fencing to control access.
- No groundwater extraction at any depth without approval.
- Hospital use prohibited.
- Land use covenant.
- Maintain monitoring of groundwater.
- Notify prior to development.
- Notify prior to change in land use.
- Activities prohibited which disturb the remedy and monitoring systems without approval.

It should be noted that the NI West Incorporated Site at 3011 Humboldt Street is not referenced within the latest Geotracker or Envirostor databases, the NPL, or Cortese lists (as accessed in April 2012). It is not known what the current status of the site is.

In addition to the above sites, the Pollock Well Field in the San Fernando Valley is identified by the US Environmental Protection Agency (EPA) as Area 4 of the 5,860-acre San Fernando Superfund Site on the NPL and is located to the immediate north of the site. The new Figure 10-2 shows the extent of the Pollock Field as based on the EPA San Fernando Valley Superfund Sites Update (June 2003). The San Fernando Valley Superfund Sites (of which the Pollock Well Field is part of) is an area where the underlying groundwater is contaminated with various chlorinated VOC's including perchloroethylene (PCE) and Trichloroethylene (TCE). In the early 1980s, the PCE and TCE were detected in numerous drinking water wells within the San Fernando Valley groundwater basin above the Maximum Concentration Levels (MCL) of five parts per billion. As a result of the contamination, State and local agencies curtailed the use of groundwater for the City's potable water supplies, and in 1986, the sites were listed in EPA's Superfund National Priority List (NPL) program and began coordinating efforts to investigate and clean up the regional groundwater contamination. The EPA has conducted quarterly groundwater monitoring since 1992, and as of 2003¹, has found

¹ US Environmental Protection Agency (EPA). July 2003 San Fernando Superfund Site Update

groundwater pollutants to be in exceedance of the MCL for 23 wells samples for TCE and 17 wells samples for PCE of 63 total wells sampled.

According to the EPA San Fernando Valley Superfund Sites Update (June 2003), as of 1994, the EPA has delegated clean up responsibilities to LADWP, and as of 1999, LADWP began operating a 3,000 gpm groundwater treatment plant for two reactivated wells. The recovered groundwater is treated to drinking water standards by liquid-phase granular activated carbon and transferred to LADWP's public water supply. The 2003 Update further states that pumping in the Pollock Wellfield is expected to capture nearly all the contamination upgradient of the wellfield that is not captured by the other area's treated by EPA further north and prevent movement of contaminated groundwater into the Los Angeles River.²

The new Figure 10-2 delineates more accurately that both PCE and TCE contamination within Area 4 that exceed the MCL as of 2001 are in an area that do not coincide with the Project Area boundaries. It also states that groundwater areas outside the areas that are delineated may have some contamination, but the most recent data from those wells are below the detection limit of 2 µg/L. Furthermore, the Property Inventory Study prepared by Ninyo & Moore included in Appendix 10A in the Draft EIR concluded that the limits of the impacted groundwater are approximately 3,000 feet northwest (upgradient) of the Plan Area.³

Therefore, as the Project Area falls outside of the Pollock Well Field Superfund Site, the Specific Plan would have less than significant impacts due to exposure of groundwater contamination associated with the Pollock Well Field Superfund Site as a result of redevelopment in the Project Area.

CERCLA Sites

The database identifies seven additional CERCLA or potential Superfund sites where no further assessment has been completed and no further steps will be taken to list them on the NPL. While these locations are not judged to be potential NPL sites, it does not mean there is no potential hazard associated with the sites. The sites are listed as follows (see Figure 10-1):

- California Brass Manufacturing, 1447 Naud Street
- Tru-Flex Rubber Products Company, 1667 North Main Street
- Los Angeles Department of Water and Power, 1630 North Main Street
- Mangus Company Incorporated, 860 North Main Street
- Baron Manufacturing, 241 Avenue 26
- People Gas Company,
- Los Angeles Conservation Corps,

² Ibid.

³ Based on the 2009 US EPA "San Fernando Valley Superfund Sites Groundwater Monitoring Program Report" (US EPA 2009)

Cortese List

There are two sites in the project area that are identified by the DTSC in the Hazardous Waste and Substances Sites (Cortese) list (see Figure 10-3), as required under Section 6.5962.5 of the California Government Code. The sites are as follows:

1. Bortz Oil Company, 1746 Spring Street
2. William Mead Homes, 1300 Cardinal Street.

The Bortz Oil Company (BOC) site was a petroleum products blending and packaging facility (see Figure 10-3). High levels of hydrocarbons and chlorinated solvents were identified within the soil with contamination also detected in the groundwater. A fire at the property during the 1980's resulted in significant contamination spills. In the late 1980's a Remedial Action Order was issued to BOC to develop and implement a Remedial Investigation/Feasibility Study (RI/FS) and Remedial Action Plan (RAP) as well as remediation. Monitoring is ongoing at the site and the cleanup status remains active.

As a result of the contaminative history of the site, the site has certain site management requirements with the following land use restrictions:

- Day Care Center prohibited
- Elder Care Center prohibited
- No groundwater extraction at any depth without approval
- Hospital use prohibited
- No oil or gas extraction at any depth
- Residence use prohibited
- Public or private school for persons under 21 prohibited.

The William Mead Homes site comprises an area to the south of Cardinal Street which historically operated as an oil refinery during the early 1900's. Oil Contamination was discovered during the construction of a playground in this area and the site entered into a Voluntary Cleanup Program during the 1990's. Supplemental investigations were completed and found elevated lead levels within the soil. A subsequent remediation project was implemented with the excavation and replacement of contaminated material. The status of the cleanup remains active. No land use restrictions are recorded against the site.

10.1.2.1A Voluntary Cleanup Sites

A review of the current Envirostor Website accessed in April 2012 indicates that a number of Voluntary Cleanup sites are located within the site boundary. As detailed in the Envirostor database glossary a Voluntary Cleanup site is defined as

those with either confirmed or unconfirmed releases, and the project proponents have requested that the DTSC oversee the evaluation, investigation and/or cleanup activities and have agreed to provide coverage for DTSC's costs.

The sites are listed as follows (see Figure 10-5):

1. Former Welch's Uniform Facility.
2. Kennington Ltd.
3. Jaybee Ajax Manufacturing.
4. Victor Industrial Battery.
5. So Cal Gas/LA Main St MGP.
6. Cornfield Site.
7. Witco/Allied Kelite Division.

The following paragraphs provide a brief summary of the status of each of the above sites. The information is based on the Envirostor Report for each site accessed via the Envirostor website as of April 2012. Descriptions of the Kennington and Jaybee Ajax sites are provided under the earlier NPL and EPA Section.

The former Welch's Uniform Facility site was used as a laundry and uniform rental facility over a 70 year period. The site is now vacant. Ground investigation and testing has found the soil and groundwater to be contaminated with volatile organic compounds including TCE's. The site is not listed on the NPL.

The Victor Industrial Battery is the site of a former battery recycler who was convicted of illegal discharge of hazardous waste into an unlined pit. The owner was ordered to remediate the site. Contamination has been found to include heavy metals. The site is not on the NPL.

As a result of the contaminative history of the site, the site has certain site management requirements with the following land use restrictions:

- Asphalt cover not to be disturbed without approval.
- Day care center prohibited.
- Elderly care center prohibited.
- No excavation of contaminated soils without agency review and approval.
- Raising of food prohibited.
- Hospital use prohibited.
- Perform H&S plan prior to subsurface work.
- Land use covenant.
- Notify damages to remedy and monitoring systems upon discovery.
- Notify prior to development.
- Notify after change of property owner.
- Notify prior to subsurface work.

- Notify prior to change in land use.
- Activities prohibited which disturb the remedy and monitoring systems without approval.
- Residence prohibited.

The So Gal Gas site was historically used as an oil and gas plant, operating over multiple plots. The site was used for chemical storage, paints and other hazardous materials. PAH's, metals, cyanides and a lampblack horizon were detected in the soil. The clean-up status as of the 2012 Envirostor web resource is 'Inactive – needs evaluation as of 7/25/2008'.

The Cornfield site is a 32 acre abandoned rail yard, which was used as a rail yard by Union Pacific Railroad from the early 1900's to 1999. The site was acquired by the State of California with the intention of converting it into a State Park. Extensive investigation and a subsequent removal action for the soils has been completed with the excavation and disposal of over 5,200 tons of contaminated soils. Contamination was found to include TPH's, lead and arsenic. Groundwater contamination continues to be investigated and/or remediated.

The Witco/Allied Kelite Division site was used from the late 1970's to the mid 1990's for the blending and formation of liquid and solid chemical compounds used in metal finishing and cleaning. Some of the soil and groundwater sampling is reported to have been completed. As of 2012 the clean up status is reported as 'No further action as of 10/24/1995'.

10.1.2.1B Abandoned Oil and Gas Wells

Review of the DOMMs database provided by the State of California Division of Oil and Gas Geothermal Resources (DOGGR), as accessed in April 2012, indicates that there are three mapped abandoned oil/gas wells within the Project Area boundary, with a further well located to the immediate north of the site off North Broadway. See Figure 10-6.

One well is located in the northern part of the Project Area at the intersection of Artesian Place and West Avenue 33. The second well is located on the western boundary of the Project Area adjacent to North Broadway and the third well is located in the south western corner of the Project Area between North Broadway and North Spring Street.

There is a significant cluster of wells located to the immediate west of the Project Area (in excess of 200 wells), but not within the Project Area boundary. See Figure 10-6. Although located outside of the Project Area, this cluster of wells has the potential to impact of the soil and groundwater quality beneath the site with the migration of contaminants into the site area through groundwater flow towards the Los Angeles River (i.e., beneath south western part of site). Mitigation Measure Hazardous Materials 10 has been added to reduce impacts to future development from abandoned oil ad gas wells.

The status of the wells is recorded as follows:

<u>API Number</u>	<u>Status</u>	<u>Type</u>	<u>Operator</u>	<u>Operator Status</u>
03716580	<u>Plugged</u>	<u>OG</u>	<u>Paul F. McKenzie</u>	<u>InActive</u>
03716588	<u>Plugged</u>	<u>OG</u>	<u>Ventura Oil Co.</u>	<u>InActive</u>
03719045	<u>Plugged</u>	<u>OG</u>	<u>Chevron U.S.A. Inc.</u>	<u>Active</u>
03700510 (off site)	<u>Plugged</u>	<u>OG</u>	<u>Chevron U.S.A. Inc.</u>	<u>Active</u>

Page 10-11, the following text is added to the text below Table 10-4:

Figure 10-7 shows the location of Leaking Underground Storage Tanks (LUST's) both active and closed out, as well as permitted Underground Storage Tanks (UST) based on the latest California State Water Resources Control Board Geotracker database (accessed in April 2012).

Page 10-11, section 10.1.2, under the subheading Existing Hazardous Materials and Wastes, page 10-11a is added after Table 10-4 consisting of this text:

In addition to the information provided in the Environmental First Search 2008, the following online databases provided by the State of California have also been reviewed:

- Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) DOMS online mapping system (accessed April 2012).
- Department of Toxic Substances Control (DTSC), Envirostor Database – An online tool for identifying sites with known contamination or sites which there may be reasons to investigate further (accessed April 2012).
- State Water Resources Control Board, Geotracker Database – The Water Boards data management system for managing sites that impact groundwater, especially those that require groundwater cleanup (accessed April 2012).

Based on the information provided in the online databases the following figures have been produced to summarize the key environmental and contaminative land uses which could potentially be of significance to future site development as a result of implementation of the Proposed Alternative.

The figures 10-1 to 10-8 referenced below are located in the figures section at the rear of this chapter.

Figure 10-1 – CERCLA sites identified in the Environmental First Search (2008)

Figure 10-2 – Pollock Wellfield NPL Site boundaries identified in the San Fernando Valley EPA Superfund Site Updates Newsletter, July 2003

Figure 10-3 – Cortese List sites identified using the Envirostor Database

Figure 10-4 - shows those sites identified using the Geotracker Database that are either open or closed cases. The Geotracker database identifies sites that impact on groundwater.

Figure 10-5 – shows those sites identified using the Envirostor Database that are undergoing or have undergone voluntary cleanup from the California Department of Toxic Substances Control (Envirostor), 2012.

Figure 10-6 – identifies the location of known abandoned gas/oil wells within the site boundary, based on DOGGR DOMS.

Figure 10-7 – identifies Leaking Underground Storage Tanks (LUST's) and permitted Underground Storage Tanks (UST's) based on the Geotracker database.

Figure 10-8 – locates School premises within the site boundary or within close proximity, with a ¼ mile buffer zone plotted around each site.

Page 10-12, Figure 1, Pollock Wells has been re-numbered as Figure 10-2 and moved to page 10-12a. A new Figure 10-1 is now page 10-12.

Pages 10-12a through g are added after Page 10-12, Figure 10-1, consisting of Figures 10-2, 10-3, 10-4, 10-5, 10-6, 10-7, and 10-8.

Page 10-17, section 10.3.2.1, under the subheading Impact Hazardous Materials 3, the second paragraph is removed and replaced with the following text:

It is unknown exactly where new businesses will be located in the Project Area as a result of implementation of the Proposed Alternative and what types of hazardous materials they could use or what types of hazardous materials they could generate. Figure 10-8 shows the location of School premises within the Project Area boundary or within close proximity of the Project Area. A ¼ mile buffer has been plotted around each of these locations. While it is assumed that implementation of the Proposed Alternative will require that all hazardous materials and wastes are managed in compliance with City of Los Angeles, State and federal requirements, Figure 10-8 shows that a significant proportion of the Project Area is within ¼ mile of a school site.

Page 10-18, section 10.3.2.1, under the subheading Impact Hazardous Materials 4, the entire section is removed and replaced with the following text:

Impact Hazardous Materials 4: Implementation of the Proposed Alternative could result in changes to sites listed in Government Code Section 65962.5 (the Cortese List), sites listed on other a lists maintained by other regulatory agencies or other sites with recognized environmental conditions that could result in release of

hazardous materials to the environment. This potential impact is considered to be significant.

The Property Inventory Study prepared by Ninyo and Moore included as Appendix 10A of the Draft EIR found seven properties that were either known to have unresolved environmental issues or an open regulatory agency case and no response plan was identified; twelve properties that were either known to have unresolved environmental issues or an open regulatory agency case and response plan was identified; eight properties with past environmental concern; and 24 properties with active UST or hazardous waster permits, and/or known historic uses that have the potential for causing impact. These are sites within the Project Area that are proposed to be designated as "Urban Center", "Urban Innovation", "Urban Village", or "Greenway". Future development and changes in uses at these sites have the potential to release hazardous material to the environment. Mitigation Measure Hazardous Materials 4 shall be incorporated to ensure future development will not increase the risk of exposure the hazardous materials and that sites will under go adequate remediation prior to future occupation. Inclusion of Mitigation Measure Hazardous Materials 4 will reduce impacts to less than significant levels.

Specifically, the Bortz Oil Company site and the William Mead Homes are also on the Cortese List and are shown in the database as locations that are "active sites with an annual workplan" for remediation. The sites are designated as "Urban Village" by the Proposed Alternative. Future development and changes in uses at these sites will need to reflect that the sites are on the Cortese List and to take appropriate steps to comply with the regulatory constraints associated with the listing. The Kennington Ltd site needs to comply with land use restrictions.

Mitigation Measures Hazardous Materials 4: Prior to the issuance of a grading permit all projects, including properties listed and ranked 1 through 3 in Table 1 of the Hazardous Property Inventory in the Mitigation Plan shall conduct a Phase I Environmental Site Assessment (ESA) to determine the potential for contaminated soil or groundwater on site. If the Phase I ESA determines that potential exist for contaminated soil or groundwater exists on site, than the project applicant shall conduct a Phase II ESA and shall follow its recommendations. A Phase I ESA shall not be required if it is already determined through previous monitoring activities that contamination exists and a Phase II ESA shall not be required if a remedial plan is already underway to address on site contaminates. On site contaminates must be addressed to the satisfaction of either the Cal/EPA or Los Angeles County Fire Department (LACFD) Site Mitigation Unit (SMU) with their approval of completion of activities/ Remediation Action Plans (RAP) submitted to the Department of Building and Safety prior to the issuance of a building permit.

The project applicant and the responsible parties for any open case, including the properties listed in Table 1 of the Hazardous Property Inventory in the Mitigation Plan, with the Los Angeles Regional Water Quality Control Board

(LARWQCB), or where a subsequent Phase II ESA confirms groundwater contamination above the Maximum Concentration Level (MCL) for the proposed use(s) shall submit to the LARWQCB a dewatering plan and treatment plan/soil RAP for the handling and disposal of contaminated groundwater/soil that may be encountered during excavation of the project for review and approval. The dewatering plan/ RAP shall include but not be limited to monitoring of excavation activities by a certified environmental consultant to identify/sample groundwater and soil that may be contaminated; and exaction, treatment and disposal of contaminated groundwater/soil in accordance with applicable regulatory requirements. Written verification from the LARWQCB of approval of dewatering plan/management plan completion (ie “no futher action” letter) shall be submitted to the Department of Building and Safety prior to issuance of building permit.

The project applicant and the responsible parties for any open case, including properties listed in Table 1 of the Hazardous Property Inventory in the Mitigation Plan, with the Department of Toxic Substance and Control or where a subsequent Phase II ESA confirms soil contamination above the MCL for the proposed use(s) shall submit to the Los Angeles County Fire Department (LACFD) Site Mitigation Unit (SMU) a soil RAP for the handling and disposal of contaminated soil that may be encountered during excavation of the project for review and approval. The RAP shall include but not be limited to monitoring of excavation activities by a certified environmental consultant to identify/sample soil that may be contaminated; and exaction, treatment and disposal of contaminated soil in accordance with applicable regulatory requirements. Written verification from the LACFD SMU of approval of RAP completion (ie “no futher action” letter) shall be submitted to the Department of Building and Safety prior to issuance of building permit.

The future uses of the Bortz Oil Company, and the Kennington ltd. site will have to be compatible with the level of remediation completed at those sites or will have to incorporate additional measures to ensure that the future uses of these sites do not result in hazards to people or the environment. The future uses shall meet the stipulated land restriction requirements or implement measures necessary to remove such restrictions at the discretion of the applicable agency responsible to ensure compliance with on-site remediation. Therefore, future uses at these sites shall comply with the State requirements related to listing on the Cortese List. Elder care, day care uses are prohibited at the Kennington Ltd. site located at 3209 Humboldt Street. Elder care, day care, public and private school and residential uses are prohibited for the Bortz Oil Company site located at 1746 Spring Street. These use restrictions shall prevail unless waived by governing state agency responsible upon finding the site is remediated to adequate standard.

Page 10-18 is added consisting of a new Hazardous Materials mitigation measure as follows:

Mitigation Measures Hazardous Materials 5:

- (Asbestos) Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.
- (Lead Paint) Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.
- (Polychlorinated Biphenyl – Commercial and Industrial Buildings) Prior to issuance of a demolition permit, a polychlorinated biphenyl (PCB) abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.

Page 10-20, section 10.3.2.1, under the subheading Impact Hazardous Materials 8, first paragraph, the sentence that begins with “The implementation of the...” is removed and replaced with the following text:

Impact Hazardous Materials 8: ~~The implementation of the Proposed Alternative could involve construction activities in areas where potentially harmful gases in the soil could be encountered. This potential impact is considered to be less than significant. Due to the nature of the historical and current land uses across the site area there is a potential for the presence of elevated concentrations of hazardous ground gases (including carbon dioxide, methane and hydrogen sulfide). Ground gases pose a risk to human health through inhalation and the potential for ignition/explosion. See Figure 10-9 Methane Plumes in the Vicinity of the Project Area.~~

Figure 10-9 is included in the figures section at the rear of this chapter.

Hazardous gases have the potential to accumulate in confined spaces such as basements, excavations, void spaces etc. Mitigation Measure Hazardous Materials 8 is incorporated to reduce potential exposure to hazardous ground gases in the Project Area. This impact would be less than significant after implementation of the mitigation measures.

Page 10-20, section 10.3.2.1, under the subheading Mitigation Measure Hazardous Materials 8, “None required” is removed and the following text is added:

Mitigation Measures Hazardous Materials 8: For properties located in a Methane Zone or a Methane Buffer Zone in the City's Zoning Information Map Access System (ZIMAS) shall do the following:

- All commercial, industrial, and institutional buildings shall be provided with an approved Methane Control System, which shall include these minimum requirements; a vent system and gas-detection system which shall be installed in the basements or the lowest floor level on grade, and within underfloor space of buildings with raised foundations. The gas-detection system shall be designed to automatically activate the vent system when an action level equal to 25% of the Lower Explosive Limit (LEL) methane concentration is detected within those areas.
- All commercial, industrial, institutional and multiple residential buildings covering over 50,000 square feet of lot area or with more than one level of basement shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. In addition to the other items listed in this section, the owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.
- All multiple residential buildings shall have adequate ventilation as defined in Section 91.7102 of the Municipal Code of a gas-detection system installed in the basement or on the lowest floor level on grade, and within the underfloor space in buildings with raised foundations.

Page 10-20b is added consisting of a new Impact Hazardous Materials item as follows:

Impact Hazardous Materials 9: Leaking of abandoned oil/gas wells could adversely affect structures and people.

The presence of abandoned oil/gas wells poses a potentially significant hazard. There is a possibility that a well may start to leak oil, gas and/or water after abandonment, with the potential to significantly impact on structures, humans, soil and groundwater. It is generally recommended that construction over abandoned wells is avoided.

According to the Division of Oil, Gas and Geothermal Resources (DOGGR) web resource all the wells within the site boundary have been plugged. Plugging to the current DOGGR standards reduces the potential for a well to start leaking, however it is not indicated when the wells present within the site boundary were plugged, and to what standard.

Mitigation Measure Hazardous Materials 9: Prior to the issuance of grading permits for the three properties identified in Table B in the Mitigation Plan that include abandoned wells, an investigation of the abandoned wells shall be carried

out to determine if further testing and/or re-abandonment, plugging or re-plugging is necessary. Well abandonment, plug or re-plug shall be conducted under the supervision of DOGGR pursuant to Section 3106 and 3208.1 of the Public Resource Code (PRC). An adequate gas venting system shall be provided in the event that construction over an abandoned well is unavoidable. The applicants should obtain a copy of the “Construction Project Site Review and Well Abandonment Procedures” published by DOGGR that outlines the information required for DOGGR review. The applicants shall obtain a determination letter from DOGGR prior to issuance of building permit.

Remedial action plans shall be required if any plugged, abandoned, and/or unrecorded wells are damaged or uncovered during site excavation or grading. DOGGR office shall be contacted to obtain information on the requirements for and approval to perform remedial operations. If contaminated soils are identified then a suitable remediation plan shall be developed to the satisfaction of the County of Los Angeles Fire Department Site Mitigation Unit (SMU), and a “no further action” letter shall be submitted to the Department of Building and Safety prior to the issuance of a building permit.

Implementation of this mitigation measure would ensure that impacts relating to the abandoned oil and gas wells to structures and individuals on the site would be reduced to less than significant.

Page 10-22, section 10.4, the following references are added:

California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), DOMS online mapping system. <http://maps.conservation.ca.gov/doms/doms-app.html>

California Department of Toxic Substances Control Envirostor online database. <http://www.envirostor.dtsc.ca.gov/public/>

California State Water Resources Control Board. <https://geotracker.waterboards.ca.gov/>

Department of Toxic Substances Control EnviroStor Data Base Glossary 2012. <http://www.envirostor.dtsc.ca.gov/public/EnviroStor%20Glossary.pdf>

Ninyo & Moore, January 14, 2010. Cornfield Arroyo Specific Plan Area Property Inventory Study. City of Los Angeles, California

11. AIR QUALITY

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 11-3, Figure 11-1; Page 11-12, Figure 11-3.

Specific changes:

Page 11-3, Figure 11-1, “School” in Legend is modified to “Public and Private Schools.” See Revised Figure 11-1 at the rear of this Section 4.

Pages 11-21 and 11-22, Impact Air Quality 2 and Impact Air Quality 3 were revised in the RP-DEIR. See RP-DEIR pages 2.A-1 to 2.A-27.

12. NOISE AND VIBRATION

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 12-1, section 12, first paragraph; Page 12-3, Figure 12-1, Page 12-5, Figure 12-2; Page 12-24, Figure 12-3.

Specific changes:

Page 12-2, section 12.1.1, under the subheading Environmental Setting, third paragraph, “Pasadena Freeway/State Route 110 (SR110)” is changed to “Arroyo Seco Parkway/State Route 110 (SR110, aka Pasadena Freeway).”

Page 12-3, Figure 12-1, “School” in Legend is modified to “Public and Private Schools.” Figure is included in the figures section at the rear of this chapter.

Page 12-14, section 12.3.2.1, under the subheading Potentially Significant Noise and Vibration Impacts of the Proposed Alternative, the second paragraph is revised as follows:

Existing ambient noise levels throughout the Project Area are high, and are not predicted to change significantly with the implementation of the Proposed Alternative (see Table 12-11 on page 12-22 and Table 12-12 on page 12-23).

13. POPULATION, HOUSING, AND EMPLOYMENT

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 13-1, section 13, first paragraph; Page 13-2, Figure 13-1.

Specific changes:

Page 13-4, Table 13-3 is revised as follows:

Table 13-3 Proposed Alternative Population and Program Assumptions

	Current (2003 <u>2007</u>)	Proposed Alternative (2035)	No Project Alternative (2035)
Population	4,802 <u>5,304</u>	31,855	5,512
Jobs	6,794 <u>2,908</u>	10,546	7,940
Dwelling Units	4,266 <u>1,448</u>	8,776	1,635
Residential (square feet)	1,683,787	10,844,830	2,020,544
Retail (square feet)	297,173	508,425	312,961
Commercial/Office (square feet)	170,127	1,702,147	229,193
Light Industrial/Research and Development (square feet)	1,872,275	6,571,654	2,076,341
Parks and Open Space (acres)	17	69	46

Source: ~~Arup North America, June 2009.~~ Los Angeles Department of City Planning,
Demographocs Research Unit.

Page 13-7, section 13.1.3.4, under the subheading Economic Profile, first sentence of second paragraph is replaced with: The average household income, \$35,678, was lower than the city-wide average of \$36,687 (based upon 1999 dollars).]

Page 13-19, section 13.3.2.2, under the subheading Potential Population, Housing, and Employment Impacts of the Proposed Alternative That Are Less Than Significant, the first sentence of the second paragraph and the last sentence of the third paragraph are revised as follows:

The implementation of the Proposed Alternative could add up to ~~7,328~~ 8,776 housing units to the City of Los Angeles' housing stock and ~~26,551~~ 31,855 residents bringing additional population to the Project Area.

The additional ~~26,551~~ 31,855 persons that could be added to the City of Los Angeles' population would not directly result in a substantial population growth over and above that which is currently anticipated in the General Plan.

14. PUBLIC SERVICES

Section-wide changes:

All references to "Redevelopment Plan" in the following locations have been redacted: Page 14-1, section 14, first paragraph.

Specific changes:

Page 14-1, section 14.1.1, under the subheading Police Protection, first paragraph, "Pasadena Freeway/State Route 110 (SR110)" is changed to "Arroyo Seco Parkway/State Route 110 (SR110, aka Pasadena Freeway)."

Page 14-2, section 14.1.2 under the subheading Fire Protection, second paragraph, the first sentence is changed to: “The LAFD has a total complement of 3,309 firefighters organized in three rotating 24-hour long shifts of 1,103 firefighters or platoons beginning at 6:30 am each day.”

Page 14-5, section 14.1.5, under the subheading Library Services, the second paragraph is revised as follows:

LAPL was established in 1872 and has a collection of 6,393,429 items servicing a population of approximately 4,000,000 in the Los Angeles region and about 13,000,000 in the metropolitan area. Twenty-one library branches (or buildings that were formerly branches) are listed in the National Register of Historic Places (NRHP) including the Richard Riordan Central Library (1926), the third largest public library in the United States in terms of book and periodical holdings, and the Lincoln Heights Branch, also known as the "Biblioteca del Pueblo de Lincoln Heights" which is the second oldest branch library in the LAPL system, ~~and the Richard Henry Dana Branch~~. The Lincoln Heights Library at 2530 Workman Street and the ~~Richard Henry Dana Library at 3320 Pepper Street~~ Cypress Park Branch at 1150 Cypress Avenue are close to the Project Area; other libraries close to the Project Area include the Arroyo Seco library at 6145 North Figueroa Street, the main branch for the Northeast Area, and the Chinatown library at 639 North Hill Street.

Page 14-21, section 14.3.2.2, Impact Public Services and Recreation Facilities 2 is revised as follows:

Impact Public Services and Recreation Facilities 2: New students generated as a result of implementing the Proposed Alternative could require new or physically altered school facilities in order to maintain acceptable service ratios or other performance objectives at local public schools. ~~Given decreased student population rates that could result from the new mixed use development allowed by the Proposed Alternative there could even be reduced demand for school services in the Project Area as a result of implementing the Proposed Alternative.~~ This potential impact is considered to be less than significant.

Page 14-23, section 14.3.2.2, under the subheading Mitigation Measure Public Services and Recreation Facilities 3, the second paragraph is revised as follows:

The implementation of the Proposed Alternative will incorporate facilities for police, fire, emergency medical, public schools, and community facilities including those administered by the City of Los Angeles, the LAPL, and the LAUSD. Capital investment for new City of Los Angeles administered public facilities and services would be generated ~~by developer fees or special district fees to be applied when the development of a specific project is submitted to the City of Los Angeles for approval~~ by new tax revenue bonds as needed and approved for specific projects.

15. UTILITIES

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 15-7, section 15.3, first paragraph.

Specific changes:

Page 15-8, section 15.3.1, table 15-1, Existing and Proposed Population and Land Uses. The figure in the cell at the intersection of row “Population” and column “Current” is changed from 4,802 to 5,304. Further, the date on the “Current” column is changed from 2003 to 2007.

Page 15-9, section 15.3.1, Table 15-2, Estimated Maximum Utility Demands. The figure in the cell at the intersection of row “Potable Water (mgd)” and column “Proposed Alternative (2035)” is changed from 6.29 to 2.75. Further, the date on the “Current” column is changed from 2003 to 2007.

Page 15-9, section 15.3.1, Table 15-3, Estimated Per Capita Utility Demands. The figure in the cell at the intersection of row “Potable Water (gallons/day)” and column “Proposed Alternative (2035)” is changed from 197 to 86. Further, the date on the “Current” column is changed from 2003 to 2007.

Page 15-9, section 15.3.2.1 under the subheading Potentially Significant Utilities Impacts of the Proposed Alternative the second paragraph is revised as follows:

The average day demand for potable water for the Proposed Alternative would be ~~about 6.29~~ 2.75 million gallons per day (mgd), an increase of ~~5.3~~ 1.66 mgd from current demand in the Project Area.

Page 15-15, section 15.3.2.2, under the subheading Potential Utilities Impacts of the Proposed Alternative That Are Less Than Significant, second paragraph, the first sentence is revised as follows:

The projected population growth in the Project Area from ~~2003~~ 2007 to 2035 that could occur as a result of the Proposed Alternative is about 27,000.

16. ENERGY AND GREENHOUSE GASES

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 16-11, section 16.2.2, first paragraph.

Specific changes:

Pages 16-4 to 16-6, section 16.1.2.4, **Greenhouse Gas Regulatory Setting**, were replaced by the RP-DEIR pages 2.B-1 to 2.B-11, section II. **Regulatory Framework**.

Page 16-6, section 16.1.2.5, under the subheading US Emissions, the following revisions are made:

The United States is one of the world's largest emitters of GHGs. In ~~2007~~ 2009, the US total GHG emissions were ~~7,150~~ 6,633 MMTCO₂-e (EPA, 2009). Carbon Dioxide made up 85 percent of these emissions.

On a per capita basis, US total GHG emissions in ~~2005~~ 2009 were approximately ~~23.7~~ 21.7 TCO₂-e/person (based on Census 2011)....

Page 16-7, section 16.1.2.5, under the subheading California Emissions, the first and third paragraphs are revised as follows:

California is the second largest emitter of GHG emissions in the United States and between the twelfth and sixteenth largest in the world. The ARB estimated total CO₂-e emissions in 1990 as approximately 427 MMTCO₂-e. By ~~2006~~ 2008, California's overall GHG emissions were approximately ~~518~~ 478 MMTCO₂-e (ARB, 2011), including imported electricity and excluding combustion of international fuels and carbon sinks or storage.

...
Per capita (normalized across the resident population) statewide emissions for ~~2005~~ 2008 were approximately ~~14.2~~ 14.1 TCO₂-e/person (based on Census 2011). This is considerably lower than average for the United States as a whole (~~23.7~~ 21.7 TCO₂-e/person)....

Page 16-8, section 16.1.2.5, under the subheading Los Angeles Emissions, the second and last sentences are revised as follows:

...In ~~2004~~ 2007, total gross emissions were estimated at ~~51.6~~ 50.3 MMTCO₂-e....
Per capita citywide emissions for ~~2004~~ 2007 were estimated to be approximately ~~13.4~~ 12.9 TCO₂-e/person, similar to the statewide figure and considerably less than the US average.

Page 16-10, Table 16-2 is revised to read:

Table 16-2 (revised): Comparison of Baseline Greenhouse Gas Emissions With and Without AB 32 Mandates

	Total Gross GHG Emissions (MMTCO ₂ -e)	Total Gross per Capita GHG Emissions (TCO ₂ -e/person)
Most Recent Baseline Data Available		
Global (2004)	49,000	7.7
<u>United States (2009)</u>	<u>6,633</u>	<u>21.7</u>
<u>California (2008)</u>	<u>478</u>	<u>14.1</u>
<u>City of Los Angeles (2007)</u>	<u>50.3</u>	<u>12.9</u>
AB 32 Key Milestones		

California (1990)	427	14.3 ¹
California (2020 business-as-usual – predicted)	600 507 ²	13.6 11.5 ³
California (2020 with AB32 mandates – predicted)	427	9.7 ³
California (2050 with AB32 mandates – predicted)	85.4	1.4 ⁴

Notes:

- 1 Per capita estimate based on U.S. Census Bureau data – 1990 population of California = 29,811,000.
- 2 CARB, Supplement to the AB 32 Scoping Plan FED, Table 1.2-2, Updated 2020 Business-as-Usual Emissions Forecast
(http://www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf)
- 3 Per capita 2020 estimates based on California Department of Finance data (2007) – 2020 population of California = 44,136,000.
Available at : <http://www.dof.ca.gov/research/demographic/reports/projections/p-3/documents/CALIFORNIA.XLS>
- 4 Per capita 2050 estimates based on California Department of Finance data (2007) – 2050 population of California = 59,508,000.

Sources: IPCC, 2007; EPA, 2009; CARB, 2011; City of Los Angeles, 2007.

Page 16-11, Subsection 16.2.1 is revised to read:

16.2.1 Energy

Appendix F of the CEQA Guidelines directs lead agencies to discuss “the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (see Public Resources Code section 21100(b)(3)).” The CEQA Guidelines establishes the means of achieving the goal of “wise and efficient use of energy” as

- (1) decreasing overall per capita energy consumption,
- (2) decreasing reliance on fossil fuels such as coal, natural gas and oil, and
- (3) increasing reliance on renewable energy sources.

Appendix F of the CEQA Guidelines also includes a potential list of criteria that a lead agency may apply when determining if a project conflicts with energy conservation or efficiency goals which may include evaluating a project's energy requirements and its energy use efficiencies, the degree by which a project complies with energy efficiency standards and a host of other topics. However, it is noted that the CEQA Guidelines do not establish thresholds under which a project will be seen to conform or obstruct energy conservation or efficiency goals. ~~Standards of significance for energy conservation are related to potential energy efficiencies or inefficiencies, energy impacts, and conservation measures. For the purposes of this Draft EIR, energy conservation impacts will be considered significant if implementation of the project would result in any of the following:~~

- ~~• An overall increase in per capita energy consumption at the site~~

- ~~An increase in reliance on natural gas and oil~~
- ~~Wasteful, inefficient and unnecessary consumption of energy~~

The City of Los Angeles “L.A. CEQA Thresholds Guide” (2006) ~~was also consulted in setting~~ standards of significance with respect to energy use. Based on applying the L.A. CEQA Thresholds Guide a significant impact would occur if:

- The project would require major new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities
- The needed energy supply infrastructure was not anticipated by adopted plans
- The project fails to incorporate energy conservation measures in the project design and/or operations

Pages 16-11 to 16-12, section 16.2.2, **Greenhouse Gases**, Page 16-13, section 16.3.1 **Assumptions**, and Pages 16-14 and 16-5, **Impact Energy and Greenhouse Gases 2** of section 16.3.2.1. **Potentially Significant Energy and Greenhouse Gas Impacts of the Proposed Alternative** is replaced with RP-DEIR pages 2.B-11 to 2.B-26, section III. Environmental Impacts

Page 16-14, Table 16-3 is revised to read:

Table 16-3: Comparison of Natural Gas and Electricity Use

Alternative	Increase in per capita energy use?				Increase in reliance on natural gas and oil?		
	Population	Electricity kWh/yr	Natural gas kBTU/yr	Significant Impact?	Electricity MWh/yr	Natural gas MBTU/yr	Significant Impact?
Existing (2011)	4,802	8,482	13,440	NA	40,730	64,537	NA
No Project Alternative (2035)	5,512	8,577	13,408	no	47,276	73,906	no
Unmitigated Growth (“Business as Usual”) scenario (2035)	31,855	5,295	11,210	no	168,670	357,092	yes
Mitigated Proposed Alternative (2035).	31,855	2,524	9,901	no	80,394	315,386	no

Notes: Units kWh/yr = kilowatt-hour per year; kBTU/yr = 1,000 British Thermal Units per year; MBTU/yr = one million British Thermal units per year).

Original DEIR Volume I, Chapter 16 Energy and Greenhouse Gas, Page 16-14, Subsection 16.3.2.1 is revised to read:

16.3.2.1 Potentially Significant Energy and Greenhouse Gas Impacts of the Proposed Alternative

Impact Energy and Greenhouse Gases 1: Implementation of the Proposed Alternative will result in an increase in reliance on natural gas and oil when compared to the existing situation Unmitigated Growth (“Business as Usual”) scenario (2035). This potential impact is considered to be significant.

Long-term energy planning for the City of Los Angeles is conducted by LADWP through the Integrated Resource Plan (IRP). As a function of the IRP, LADWP forecasts future energy needs based on a retail sales forecast, which projects growth in the different customer classes taking into account population projections, normalized weather, employment and personal consumption. The IRP accommodates growing demand by diversifying energy sources (by greatly expanding renewable energy) and developing demand side resources such as energy efficiency programs. As discussed in Chapter 13 of the Original DEIR, the Proposed Alternative will result in an increase in population growth in the Project Area, however the anticipated population accommodate by the Proposed Alternative is six percent of the total population growth anticipated for the City of Los Angeles for 2035 as established by SCAG in the 2012 RTP/SCS⁴, and targeted in a location in the City that could absorb more growth in compliance with SB 375. As such, the overall growth in energy demand in the Project Area is consistent with the IRP, especially since the Proposed Alternative includes programs to reduce energy demand from oil and gas resources as stated below.

The City-wide programs attributed to the Green LA CAP that apply to the project include diversification of LADWP’s power supply to include a renewable energy portfolio, conformance of increased energy efficient building standards and increased water conservation requirements in plumbing fixtures and landscape areas. The Los Angeles Department of Water and Power (LADWP) has taken significant steps in recent years to decrease its reliance on gas and oil. Since 2005, it has more than doubled its portfolio of renewable energy by purchasing wind, solar, and geothermal power. The goal is to generate 20 percent of its electricity from clean, renewable sources by 2010 and 35 percent by 2020. LADWP increased its percentage of renewable power by 3 percent between 2004 and 2008, reducing carbon dioxide emissions by an estimated 524,000 metric tons. (Green Building 2011).

As shown in Table 16-3, the build out of the Mitigated Proposed Alternative (2035) would result in 52.3 percent reduction in electricity demand and 11.6 percent reduction natural gas and oil as compared to the Unmitigated Growth (“Business as Usual”) scenario (2035). This is consistent with the RP-DEIR analysis, which found that the build out of the Mitigated Proposed Alternative (2035) would result in 46 percent less annual

⁴ SCAG Population Forecast for the City of Los Angeles Sub-region, SCAG RTP-SCS, Growth Forecast Appendix, April 2012

GHG emissions based on energy use than as compared to the Unmitigated Growth (“Business as Usual”) scenario (2035). Also shown in the revised Table 16-3 above, the Proposed Alternative would have lower per capita energy consumption than all other scenarios including the Existing (2011) conditions. Furthermore, The Proposed Alternative will include a requirement to supply 20 percent of non-residential and 10 percent of residential energy demand with renewable energy generation, exceeding energy conservation goals of most if not all other plans of this scale in the City of Los Angeles. The Proposed Alternative’s impact relating to inefficient use of energy resources is considered to be less than significant. Regardless, Mitigation Measure Energy and Greenhouse Gases 1 is included below that states the Green LA Climate Action Plan would serve to reduce energy demand of the Proposed Alternative.

Mitigation Measure Energy and Greenhouse Gases 1: The City of Los Angeles has developed and is implementing a Green LA Climate Action Plan with emphasis on energy efficiency and conservation. Proposed Alternative shall require future projects to supply 20 percent of non residential and 10 percent of residential energy demand with renewable energy generation. With implementation of the Green LA Climate Action Plan and Proposed Alternative measures in the Project Area, this potentially significant impact would be reduced to a level that is less than significant.

17. OTHER CEQA CONSIDERATIONS

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 17-1, section 17.1, last paragraph.

Specific changes:

Page 17-8, Section 17.2.15.2 is redacted. See Section 2.B.III of the RP DEIR for cumulative Greenhouse Gas analysis.

Page 17-9, section 17.3, under the subheading Growth-Inducing Impacts, first paragraph, the remainder of the first paragraph after this sentence is redacted: “Also, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.”

Page 17-15, section 17.6.2, under the subheading Other Alternatives Considered, the paragraph is revised to:

~~Three~~ Two other alternatives were considered and evaluated during the development of the Proposed Alternative: the Modified Project Alternative, and the Reduced Project Standards Alternative, ~~and the No Redevelopment Plan Alternative.~~

Page 17-16, section 17.6.2.3, subheading No Redevelopment Plan Alternative, this section is redacted in its entirety.

Page 17-19. After this page a new page 17-20, section 17.8 is added:

17.8 Additional References:

California Department of Conservation, Division of Oil, Gas & Geothermal Resources (DOGGR), DOMS online mapping system. <http://maps.conservation.ca.gov/doms/doms-app.html>

California Department of Toxic Substances Control Envirostor online database. <http://www.envirostor.dtsc.ca.gov/public/>

California State Water Resources Control Board. <https://geotracker.waterboards.ca.gov/>

Department of Toxic Substances Control EnviroStor Data Base Glossary 2012. <http://www.envirostor.dtsc.ca.gov/public/EnviroStor%20Glossary.pdf>

Original-DEIR Appendix

Appendix 4A- Lane configurations are revised. See Lane Configurations (Partial) figures at the rear of this chapter.

RP-DEIR

2.A. AIR QUALITY

Section-wide changes:

All references to “Redevelopment Plan” in the following locations have been redacted: Page 2.A-3, Figure 2.A-1; Page 2.A-7, Figure 2.A-2; Page 2.A-11, Figure 2.A-3; Page 2.A-12, Figure 2.A-4; Page 2.A-13, Figure 2.1-7

Specific changes:

Page 2.A-18, Mitigation Measures Air Quality 2 is revised to read:

Mitigation Measure Air Quality 2: Based on the recommended buffer distances of the California Air Resources Board (CARB), for all projects that proposes sensitive land uses, which may include residential uses, daycare centers, medical facilities, and other sensitive receptors within at least 500 feet from either the I-5 or SR-110 freeways, the Project Applicant shall submit a health risk assessment (HRA) prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the South Coast Air Quality Management District (SCAQMD) to the Director of Planning or their designee, prior to issuance of building permit. If the HRA shows that the incremental cancer risk exceeds ‘an acceptable level’ here defined as either one in one hundred thousand (1.0E-05), or the appropriate non-cancer hazard index ~~that exceeds~~ of 1.0, the applicant shall be required to identify and demonstrate that Best Available Control

Technologies for Toxics (T-BACTs) are capable of reducing potential cancer and non-cancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to installation of Minimum Efficiency Reporting Value (MERV) filters rated at 13 or better at all residential units.

Page 2.A-20, Mitigation Measures Air Quality 10 is revised to read:

Mitigation Measure Air Quality 10: The applicant/developer may be permitted to install an alternative design feature or mitigation than those measures that are prescribed by the City if the developer carries out a health risk assessment (HRA) that demonstrates the air quality impacts to on site occupants would be less than significant after inclusion of specific site design features. The HRA shall include a dispersion model acceptable to SCAQMD, meteorological data and estimation of both cancer and non-cancer risks. If the HRA shows that the incremental cancer risk exceeds 'an acceptable level' here defined as either one in one hundred thousand (1.0E-05), or the appropriate non-cancer hazard index that exceeds of 1.0, the applicant shall be required to identify and demonstrate that Best Available Control Technologies for Toxics capable of reducing potential cancer and non-cancer risks to an acceptable level, including appropriate enforcement mechanisms.

2.B. GHG EMISSIONS

Pages 2.B-15 to 2.B-16, Table B.2-1 is relabeled as B.1-1

Page 2.B-15, subsection 3.b.i. Construction Impacts, the following text is revised to remove million:

As shown in Table B.1-1 below, construction emissions for the Proposed Alternative were estimated to be 30,072 ~~million~~ metric tons of CO₂e emissions on a maximum year basis.

Page 2.B-15, subsection 3.b.i. Operational Impacts, the following text is revised:

As shown in Table ~~B.2-1~~ B.1-1 below, operational emissions for the Unmitigated Growth ("business as usual") scenario were estimated to be ~~721,524~~ 383,171 metric tons of CO₂e emissions annually in 2035.

Page 2.B-16, subsection 3.b.ii. Operational Impacts, the following text is revised:

As shown in Table ~~B.2-1~~ B.1-1 below, operational emissions for the Proposed Alternative when accounting for City-wide programs, project-specific land use strategies, and mitigation measures were estimated to be ~~548,644~~ 235,812 metric tons of CO₂e emissions annually in 2035.

Page 2.B-16, subsection 3.b.ii. Operational Impacts, Table B.1-1 is revised to replace millions with metric:

Table B.1-1: Quantification of GHG Emissions (CO₂e Emissions (million metric tons per year))

Sources	Existing (2011)	No Project Alternative (2035)	Unmitigated Growth ("Business as Usual") scenario (2035)	Mitigated Proposed Alternative (2035)	Mitigated Proposed Alternative (2035) over 'Business as Usual')
Construction (maximum year)*	5,479	5,479	30,072	30,072	100%
Operations					
Area	957	1,235	5,630	5,597	-1%
Energy	26,421	30,613	114,235	62,243	-46%
Mobile	75,908	72,950	231,051	144,512	-37%
Waste	2,161	2,474	7,734	3,867	-50%
Water	5,425	6,520	24,522	19,593	-20%
Total Operations	110,872	113,792	383,171	235,812	-38%
*Note: Construction emissions for "Existing" and "No Project" assume normal construction activities at the Project Area, without the CASP Source: Balloffet International, LLC, 2012; CalEEMod results (See Appendix II)					

Page 2.B-17, Subsection 3.b.ii. Operational Impacts, **Compliance with 2006 CAT Report Strategies, CARB's Scoping Plan Recommended Measures and Green LA Climate Action Plan**, the following text is revised:

The consistency of the Proposed Alternative with the strategies from the 2006 CAT Report and CARB's Scoping Plan measures is evaluated in Table ~~B.2-2~~ B.1-2, Proposed Alternative Consistency with 2006 CAT Report Greenhouse Gas Emission Reduction Strategies, and Table ~~B.2-3~~ B.1-3, Proposed Alternative Consistency with Scoping Plan Recommended Greenhouse Gas Emission Reduction Measures, respectively.

Page 2.B-18, Table B.2-2 is relabeled as B.1-2

Page 2.B-21, Table B.2-3 is relabeled as B.1-3

2.C. NOISE

Pages 2.C-4 and 2.C-5, subsection II, Impact Evaluation, is revised:

Mitigation Measure Noise and Vibration 2: Section 112.05 and Section 41.40 of the City of Los Angeles Municipal Code has noise ordinances to monitor or regulate construction noise. These ordinances have noise limits for construction activities in conjunction with restrictions to working hours for certain activities.

To minimize the impact of construction activities associated with implementation of the Proposed Alternative, the City of Los Angeles shall additionally require developers to adhere to the following guidelines as a condition of approving a development permit:

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- Whenever construction occurs adjacent to occupied residences (on- or offsite), temporary barriers shall be constructed around the construction sites to shield the ground floor of the noise-sensitive uses. These barriers shall be of ¾-inch medium density plywood sheeting, or equivalent, and shall achieve an STC of 30 or greater, based on certified sound transmission loss data taken according to American Society for Testing and Materials Test Method E90 or as approved by the City of Los Angeles Building Department.
- Construction equipment staging areas shall be located as far as feasible from residential areas while still serving the needs of construction contractors.
- Quieter “sonic” pile drivers shall be used, unless engineering studies are submitted to the City of Los Angeles showing this is not feasible and cost effective, based on geotechnical considerations.
- Groundborne vibration impacts from construction activities shall be considered in the construction programs to minimize the disturbance to noise-sensitive receptors.
- Routes for heavy construction site vehicles shall be identified to minimize noise and vibration impacts to residences and noise-sensitive receptors.
- Activities that generate high noise levels — such as pile driving and the use of jackhammers, drills, and impact wrenches — shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday.
- An information sign in English, Spanish and Chinese shall be posted at the entrance to the construction site that identifies the permitted construction hours and provides a dedicated telephone number to receive information about the construction process and to report complaints regarding excessive noise levels.

Pages 2.D-5 and D-7 are revised as follows:

20. ~~S N~~ Avenue 18 & N Spring St/N Broadway
29. S Avenue ~~20~~ 19 & N Main St
30. S Avenue ~~21~~ 20 & N Main St
34. N Mission Rd & E Cesar E. Chavez Av
35. N Mission Rd & Daly St/Marengo St
36. N Mission Rd & Griffin Av/Zonal Av
37. N Mission Rd & Valley Blvd
38. N State St & Marengo St
39. N Hope St & W Temple St
40. N Grand Av & W Cesar Chavez Av
41. N Broadway & W Cesar E. Chavez Av
42. N Hill St & Alpine ~~Av~~ St
43. N Broadway & Alpine ~~Av~~ St

Pages 2.D-9 and D-10, table 2.D-1, the following revisions are made:

20. ~~South North~~ Avenue 18 & North Spring Street/North Broadway
29. South Avenue ~~20~~ 19 & North Main Street
30. South Avenue ~~21~~ 20 & North Main Street
34. North Mission Road & East Cesar E. Chavez Avenue
35. North Mission Road & Daly Street/Marengo Street
36. North Mission Road & Griffin Avenue/Zonal Avenue
37. North Mission Road & Valley Boulevard
38. North State Street & Marengo Street
39. North Hope Street/SR 110 & SR 101 Southbound Off-Ramps & West Temple Street
40. North Grand Avenue & West Cesar Chavez Avenue
41. North Broadway & West Cesar E. Chavez Avenue
42. North Hill Street & Alpine ~~Avenue~~ Street
43. North Broadway & Alpine ~~Avenue~~ Street

Please see Table 2.D-1 in the figures section at the rear of this chapter.

Page 2.D-11, under the subheading Impact Transportation 2, the following revisions are made:

- Intersection 20: ~~South North~~ Avenue 18 and North Spring Street/North Broadway
- Intersection 29: South Avenue ~~20~~ 19 and North Main Street
- Intersection 34: North Mission Road and East Cesar E. Chavez Avenue
- Intersection 35: North Mission Road and Daly Street/Marengo Street
- Intersection 40: North Grand Avenue and West Cesar Chavez Avenue
- Intersection 41: North Broadway and West Cesar E. Chavez Avenue
- Intersection 42: North Hill Street and Alpine ~~Avenue~~ Street
- Intersection 43: North Broadway and Alpine ~~Avenue~~ Street

Pages 2.D-13 to D-16, under the subheading Intersection Improvements Considered but Determined to be Infeasible, the following revisions are made:

- ~~South North~~ Avenue 18 and North Spring Street/North Broadway (Intersection #20)
- South Avenue ~~20~~ 19 and North Main Street (Intersection #29)

- North Mission Road and East Cesar E. Chavez Avenue (Intersection #34)
- North Mission Road and Daly Street/Marengo Street (Intersection #35)
- North Grand Avenue and West Cesar Chavez Avenue (Intersection #40)
- North Broadway and West Cesar E. Chavez Avenue (Intersection #41)
- North Hill Street and Alpine ~~Avenue~~ Street (Intersection #42)
- North Broadway and Alpine ~~Avenue~~ Street (Intersection #43)

Pages 2.D-19 and D-20, table 2.D-3, the following revisions are made:

20. ~~South North~~ Avenue 18 & North Spring Street/North Broadway
29. South Avenue ~~20~~ 19 & North Main Street
30. South Avenue ~~24~~ 20 & North Main Street
34. North Mission Road & East Cesar E. Chavez Avenue
35. North Mission Road & Daly Street/Marengo Street
36. North Mission Road & Griffin Avenue/Zonal Avenue
37. North Mission Road & Valley Boulevard
38. North State Street & Marengo Street
39. North Hope Street/SR 110 & SR 101 Southbound Off-Ramps & West Temple Street
40. North Grand Avenue & West Cesar Chavez Avenue
41. North Broadway & West Cesar E. Chavez Avenue
42. North Hill Street & Alpine ~~Avenue~~ Street
43. North Broadway & Alpine ~~Avenue~~ Street

FIGURES

Table 4-3 Intersection Traffic Operations (Partial) Existing (2009) Conditions

Figures 4-3, 4-8, 4-9 (Partial) Peak Hour Traffic Volumes Existing Conditions for Intersection 5 only.

Table 4-6 Intersection Traffic Operations (Partial) Cumulative (2035) Conditions

Figure 4-7 Bicycle Network Cumulative (2035) Plus Proposed Alternative Conditions

Figure 5-15 Cumulative Yearly Irrigation Assessment

Figure 5-16 Shadow Analysis Typical Yearly Hours of Shade

Figure 5-17 Shadow Analysis Typical Hours of Shade December 21

Figure 7-7 Groundwater Basin Boundaries in the Vicinity of the Plan Area

Figure 10-1 CERCLA Sites

Figure 10-2 Pollock Wellfield

Figure 10-3 Cortese List

Figure 10-4 Cleanup Sites-Open and Closed Cases

Figure 10-5 Voluntary Cleanup Sites

Figure 10-6 Oil and Gas Wells

Figure 10-7 Permitted and Leaking Underground Storage Tanks (USTs)

Figure 10-8 Schools with ¼ mile Buffer

Figure 12-1 Location of Sensitive Receptors in the Vicinity of the Site

Figure Appendix 4A- Lane Configurations (Partial)

Figure RP-2.D-1 (Partial): Intersection Traffic Operations Existing (2009) Plus Proposed Alternative Conditions

Table 4-3 (Partial): Intersection Traffic Operations — Existing (2009) Conditions

Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		V/C or Delay ¹	LOS ²	V/C or Delay ¹	LOS ²
5. West Avenue 26 & SR 110 Southbound Off-Ramp	Side-Street Stop	129 47.4	FE	>200	F
14. North Avenue 18 & Pasadena Avenue	Signalized	0. 609 482	BA	0.422	A
22. Daly Street & North Broadway	Signalized	0.6 66 54	B	0. 635 5	AB
26. North Alameda Street & West College Street	Signalized	0.430	A	0.5 16 9	A
33. North Alameda Street & North Main Street/Ord Street	Side-Street Stop	15.39	C	12.63	B
38. State Street & Marengo Street	Signalized	0.4 95 88	A	0.47 54	A

Notes: ¹ For all-way stop-controlled intersections, the overall average intersection control delay is reported in seconds per vehicle. For side-street stop control, the average control delay for the worst movement is reported in seconds per vehicle.

² LOS based on CMA methodology for signalized intersections and HCM unsignalized methodology for unsignalized intersections.

Shading indicates that the intersection operates at LOS E or F.

Source: Fehr & Peers, 2012.

Existing Conditions	Cumulative (2035) No Project Conditions	Existing (2009) Plus Proposal Alternative Conditions	Cumulative (2035) Plus Proposal Alternative Conditions
5. W Avenue 26 & Sr-110 SB Off-Ramp	5. W Avenue 26 & Sr-110 SB Off-Ramp	5. W Avenue 26 & Sr-110 SB Off-Ramp	5. W Avenue 26 & Sr-110 SB Off-Ramp

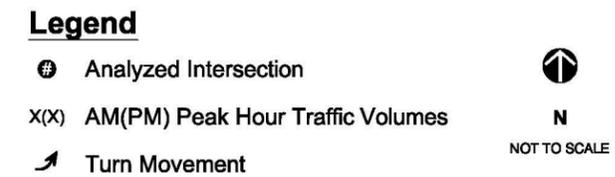
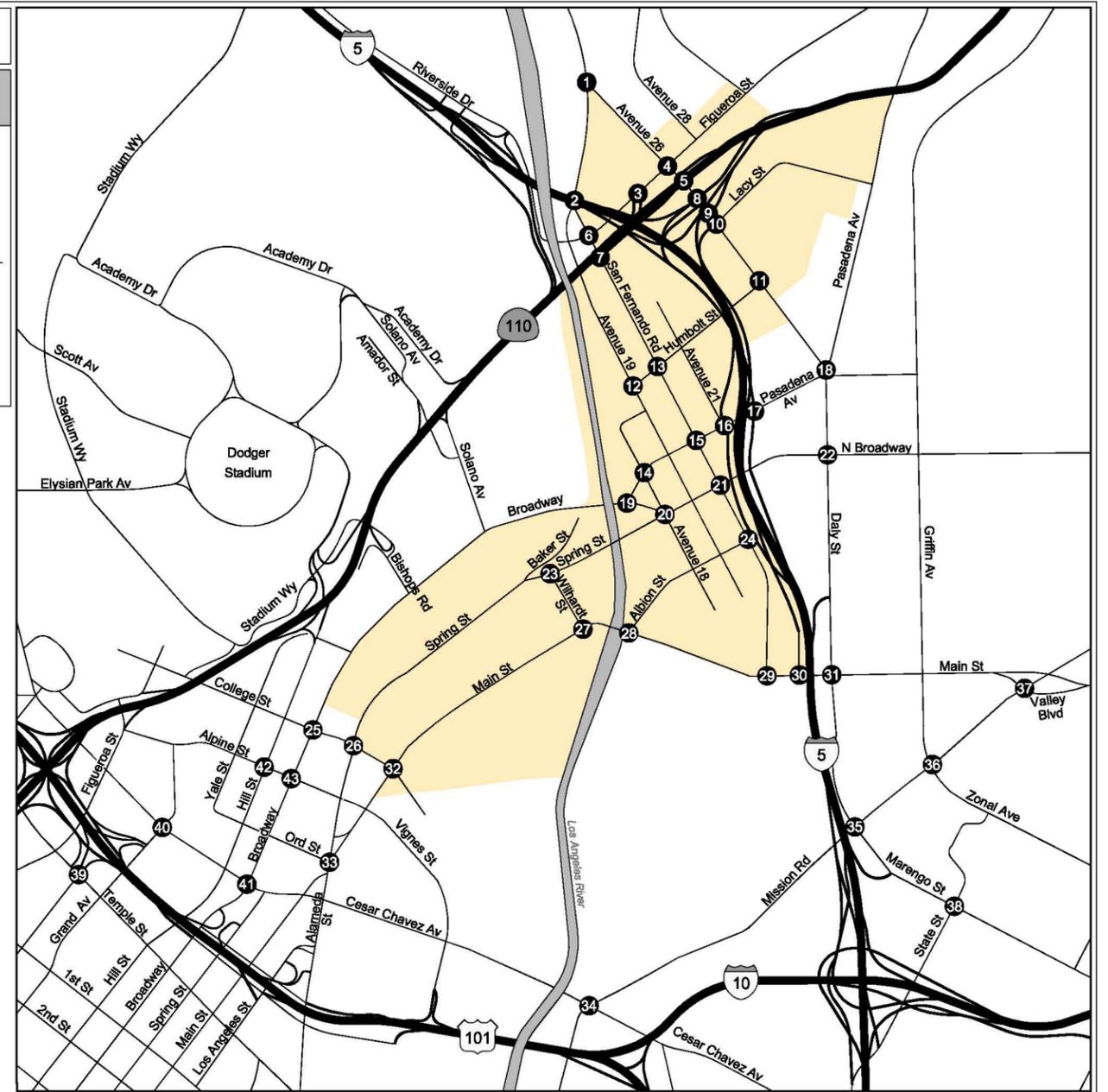


Table 4-6 (Partial): Intersection Traffic Operations – Cumulative (2035) Conditions

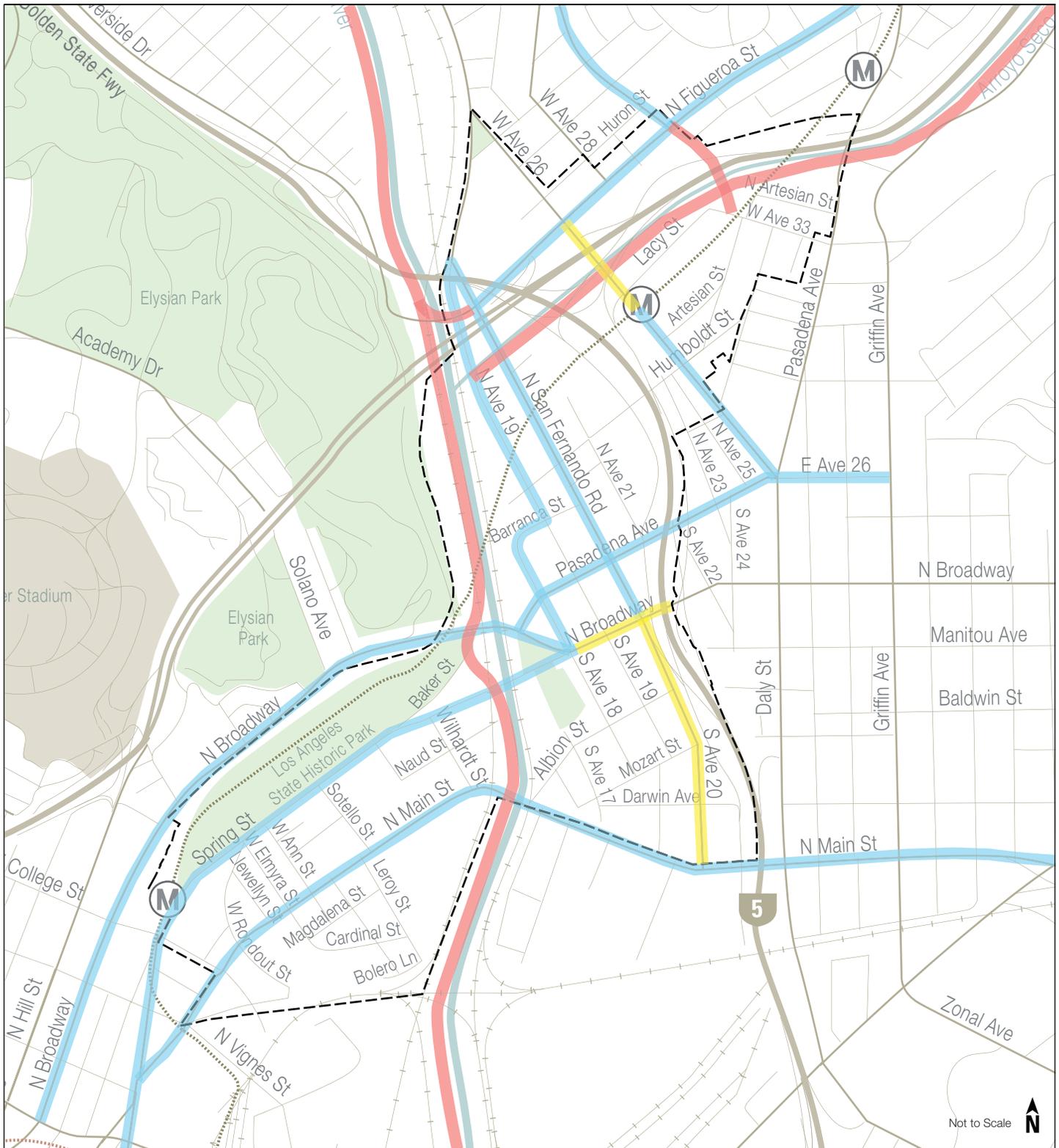
Intersection	Traffic Control	No Project Alternative				Proposed Alternative			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		V/C or Delay ¹	LOS ²						
5. West Avenue 26 & SR 110 Southbound Off-Ramp	Side-Street Stop	<u>117.3</u> >200	F	>200	F	<u>55.2</u> >200	F	>200	F
14. North Avenue 18 & Pasadena Avenue	Signalized	0.567	A	0.713	C	<i>0.84437</i>	<i>D</i>	0.7 <u>2215</u>	C
22. Daly Street & North Broadway	Signalized	0.819	D	0.8 <u>5410</u>	D	<u>0.7420</u> 800	<i>GD</i>	<u>0.7610.7</u> 97	C
26. North Alameda Street & West College Street	Signalized	0.450	A	0.5 <u>323</u>	A	0.202	A	0.4 <u>652</u>	A
33. North Alameda Street & North Main Street/Ord Street	Side-Street Stop	53.1	F	17.2	C	39.3	E	18.5	C
38. State Street & Marengo Street	Signalized	<u>0.625590</u>	<i>BA</i>	<u>0.59762</u>	A	<u>0.55388</u>	A	<u>0.42762</u>	A

Notes: ¹ For all-way stop-controlled intersections, the overall average intersection control delay is reported in seconds per vehicle. For side-street stop control, the average control delay for the worst movement is reported in seconds per vehicle.

² LOS based on CMA methodology for signalized intersections and HCM unsignalized methodology for unsignalized intersections. Shading indicates that the intersection operates at LOS E or F.

Bold-italic indicates a significant impact.

Source: Fehr & Peers, 2012.



Legend

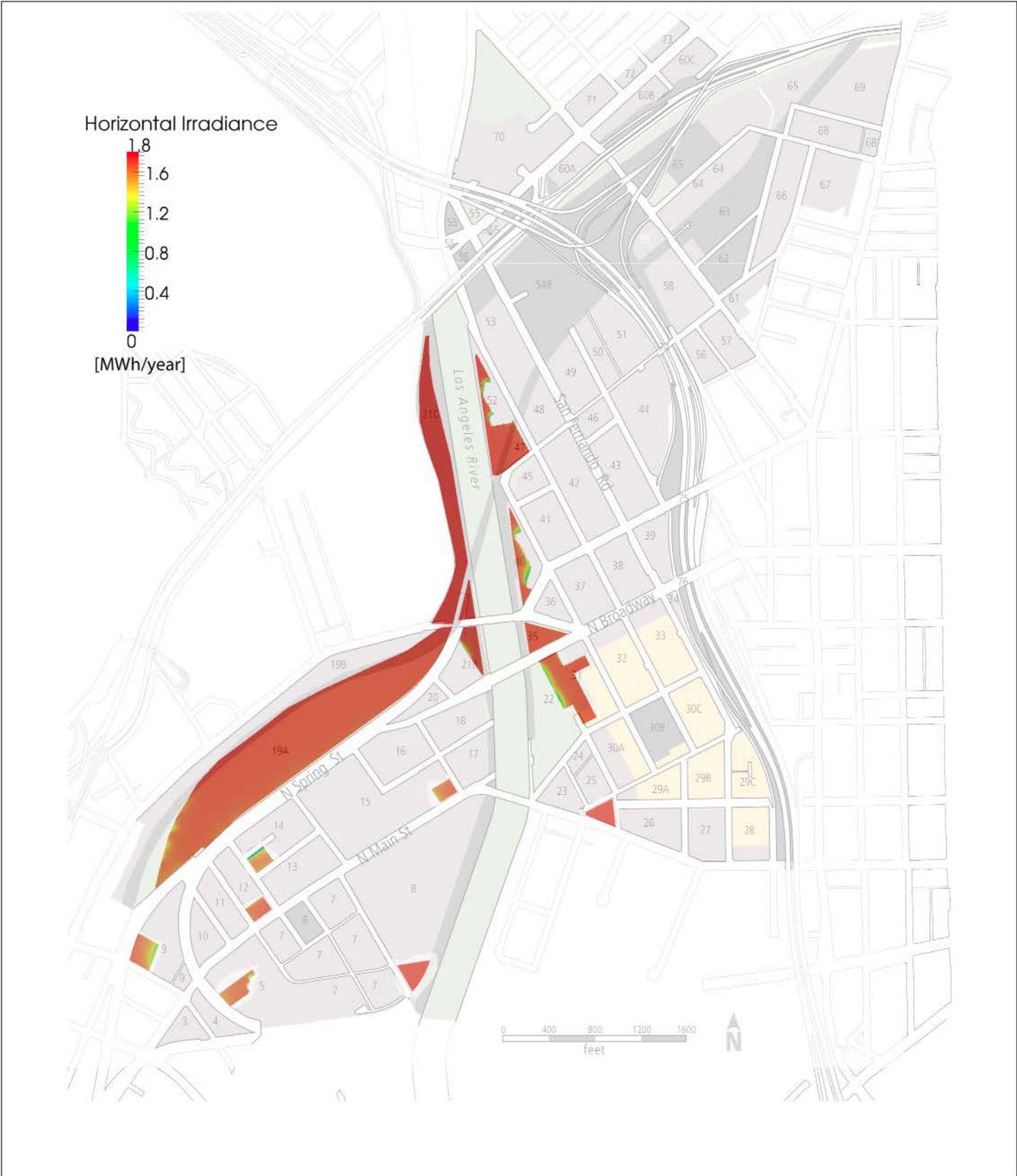
- Bicycle Path
- Bicycle Lane
- Bicycle Route
- Project Area Boundary
- M Metro Line and Station

Source

Fehr & Peers, 2011.

Figure 4-7
Bicycle Network
Cumulative (2035) Plus
Proposed Alternative Conditions
 Cornfield Arroyo Seco Specific Plan
 Final EIR

August 2012

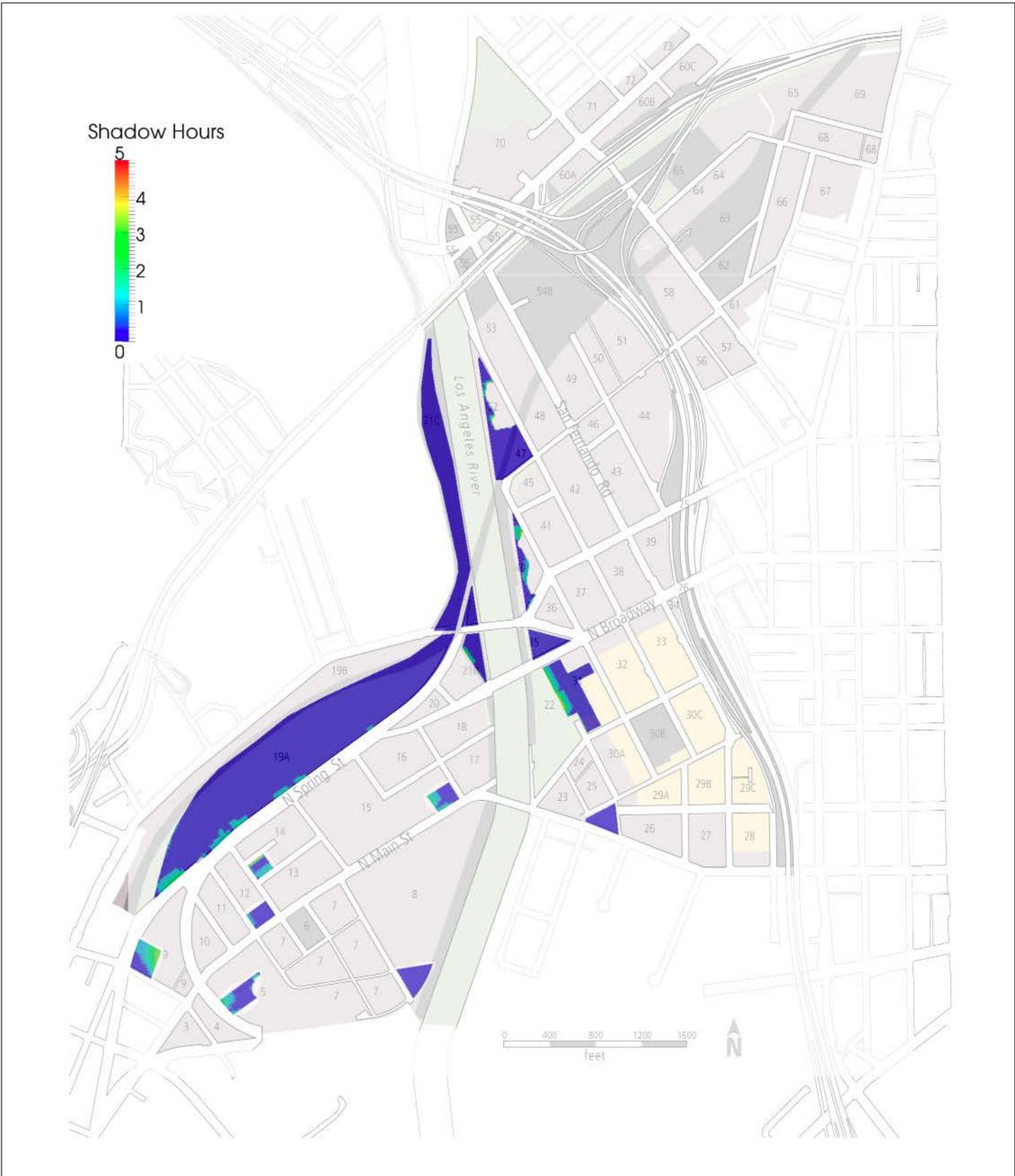


Source
 City of Los Angeles, 2011. Arup North America Ltd, 2012.

Figure 5-15
Cumulative Yearly Irradiation
Assessment
 Cornfield Arroyo Seco Specific Plan Final EIR

September 6, 2011



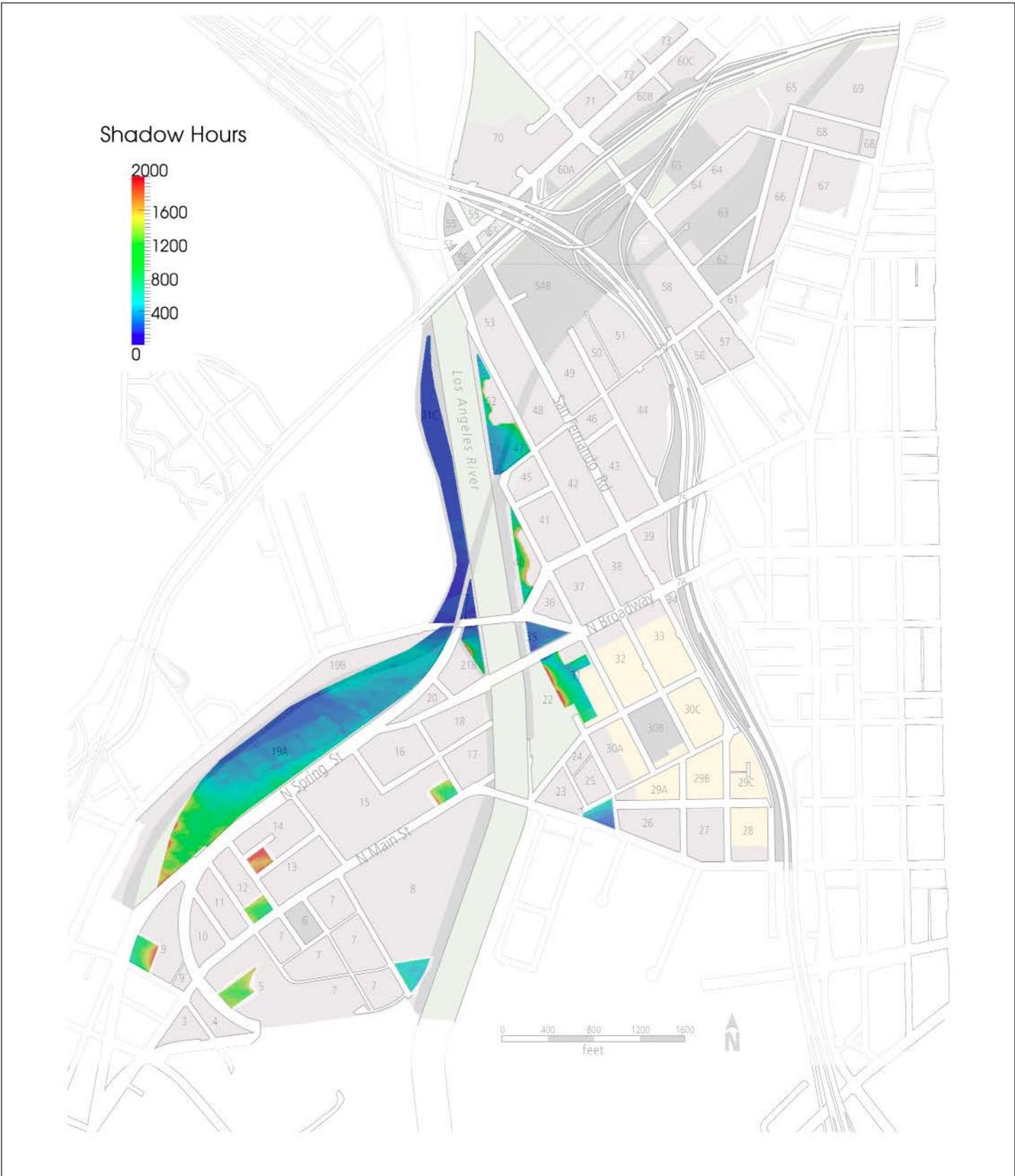


Source
 City of Los Angeles, 2011. Arup North America Ltd, 2012.

Figure 5-17
Shadow Analysis
Typical Hours of Shade December 21
 Cornfield Arroyo Seco Specific Plan Final EIR

September 6, 2011



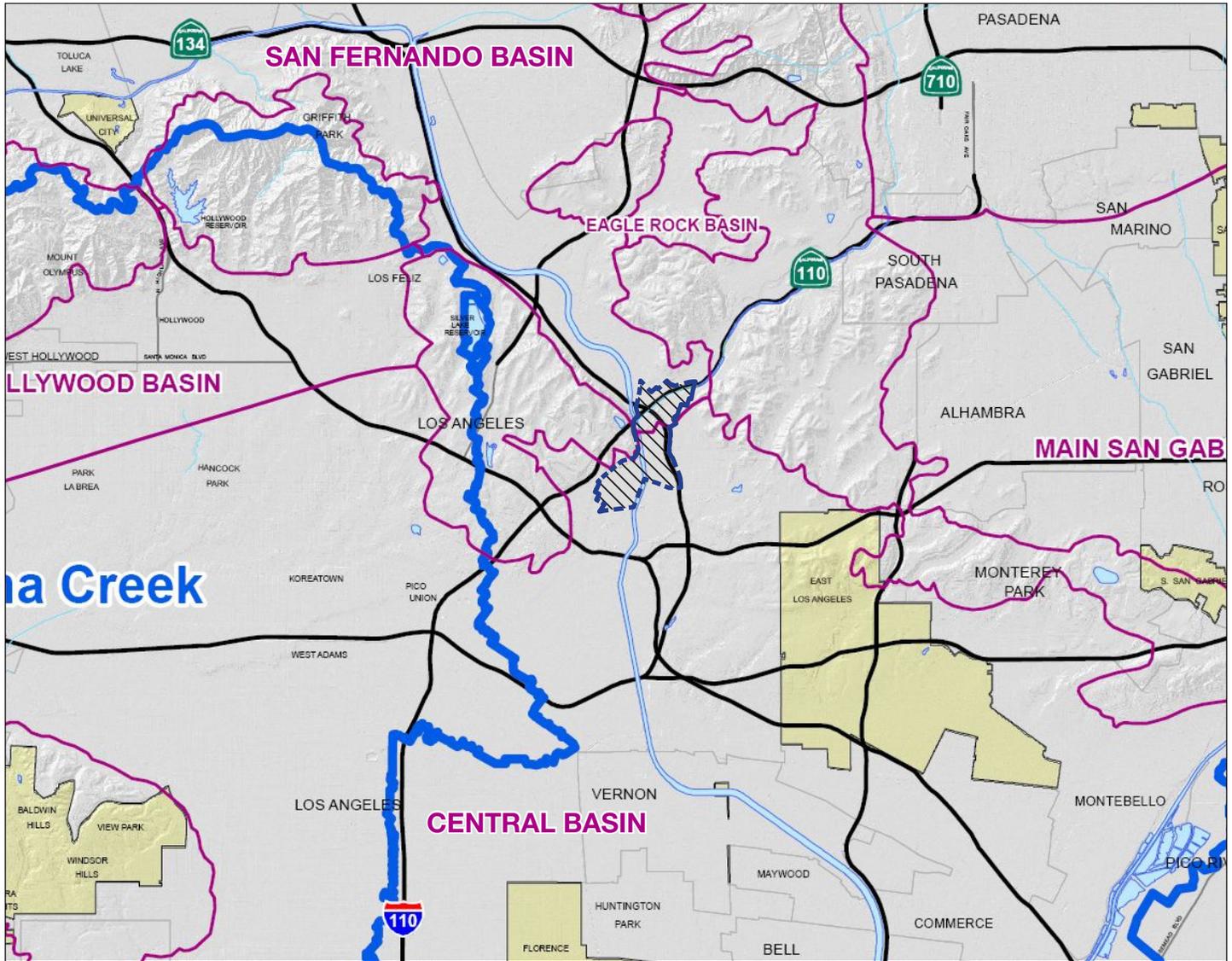


Source
 City of Los Angeles, 2011. Arup North America Ltd, 2012.

Figure 5-16
Shadow Analysis
Typical Cumulative Yearly Hours of Shade
 Cornfield Arroyo Seco Specific Plan Final EIR

September 6, 2011





Legend

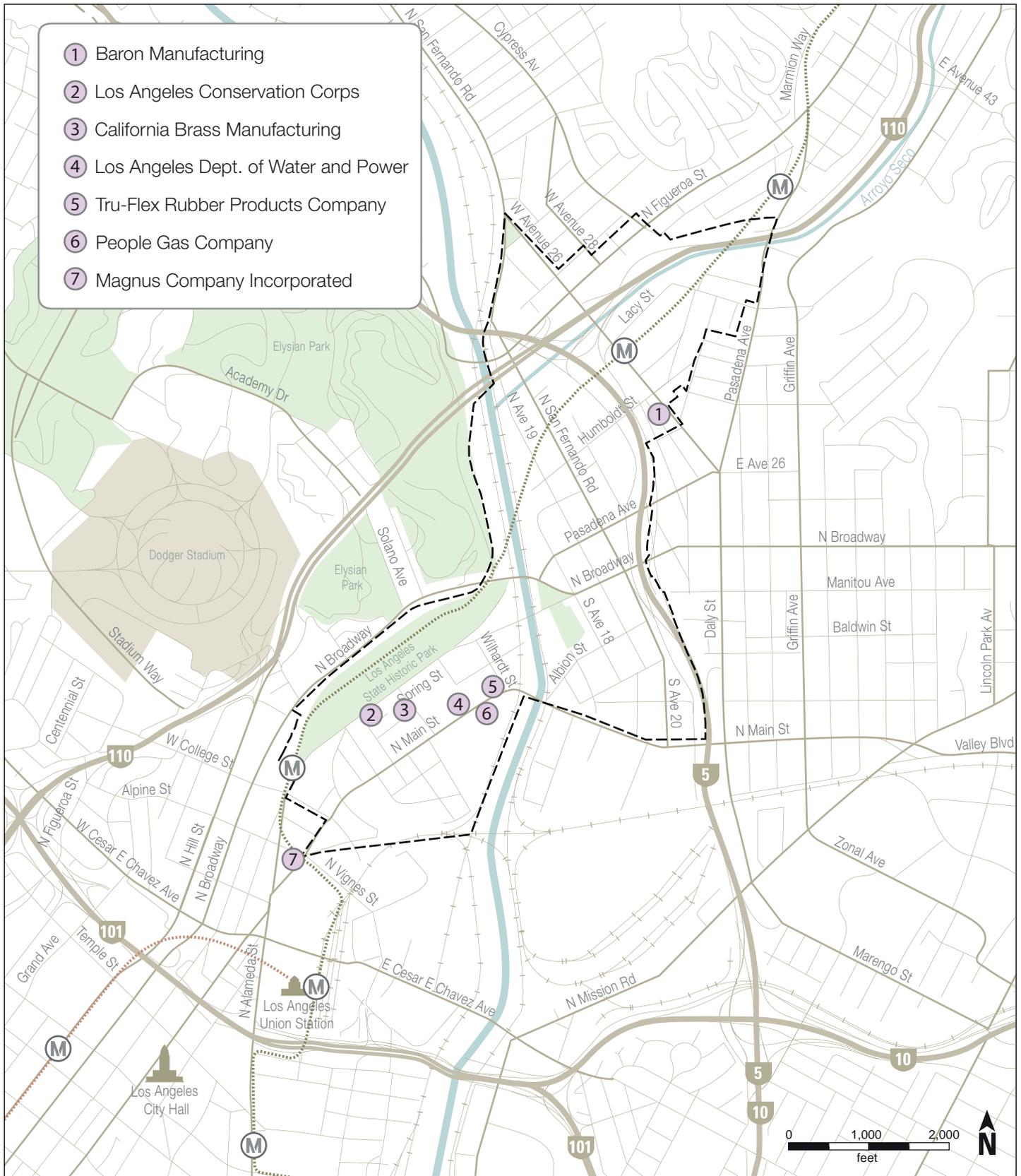
 Project Area Boundary

Source

National Weather Service, June 2008; California Irrigation Management Information System, 2008.

Figure 7-7
Groundwater Basin Boundaries in
the Vicinity of the Plan Area

Cornfield Arroyo Seco Specific Plan
 Final EIR
 July 2012



Legend

- # CERCLA Site
- Project Area Boundary
- (M) Metro Line and Station

Source

Assumed based on Environmental FirstSearch (2008).

**Figure 10-1
CERCLA Sites**

Cornfield Arroyo Seco Specific Plan
Final EIR
April 24, 2012



Legend

- Pollock Wellfield
- Project Area Boundary
- Metro Line and Station
- Well Sampled in 1997 or Later
- >DL - 5 ug/L (MCL)
- 5.01 - 50 ug/L

Sources

Cornfield Arroyo Seco Specific Plan area, Property Inventory Study, Figure 2, Ninyo and Moore 2010; San Fernando Valley EPA Superfund Site Updates Newsletter, July 2003.

**Figure 10-2
Pollock Wellfield**

Cornfield Arroyo Seco Specific Plan
Final EIR
April 24, 2011





Legend

- State Response Site
- Project Area Boundary
- Metro Line and Station

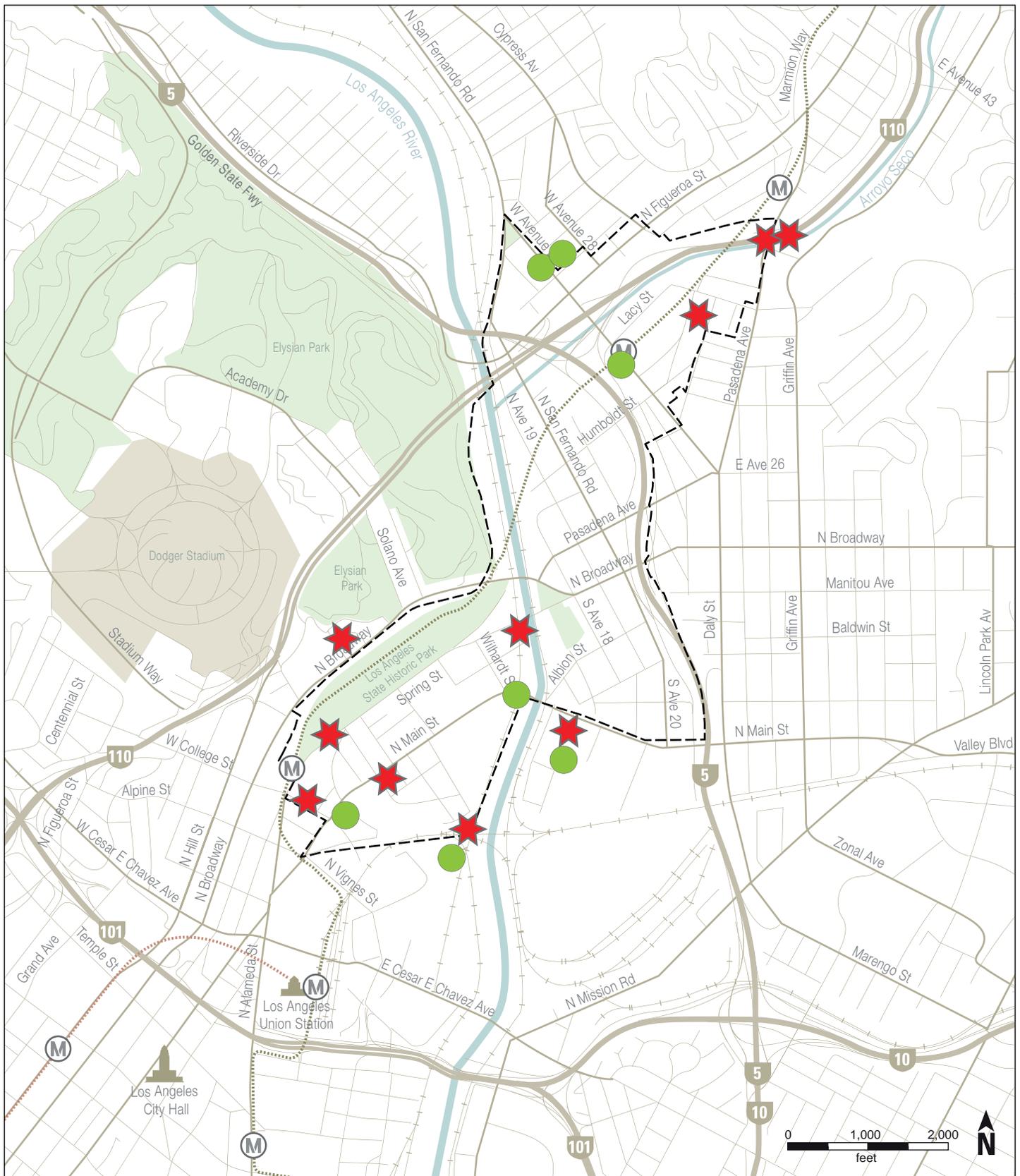
Source

California Department of Toxic Substance Control (Envirostor), 2012.

**Figure 10-3
Cortese List**

Cornfield Arroyo Seco Specific Plan
Final EIR
April 24, 2012





Legend

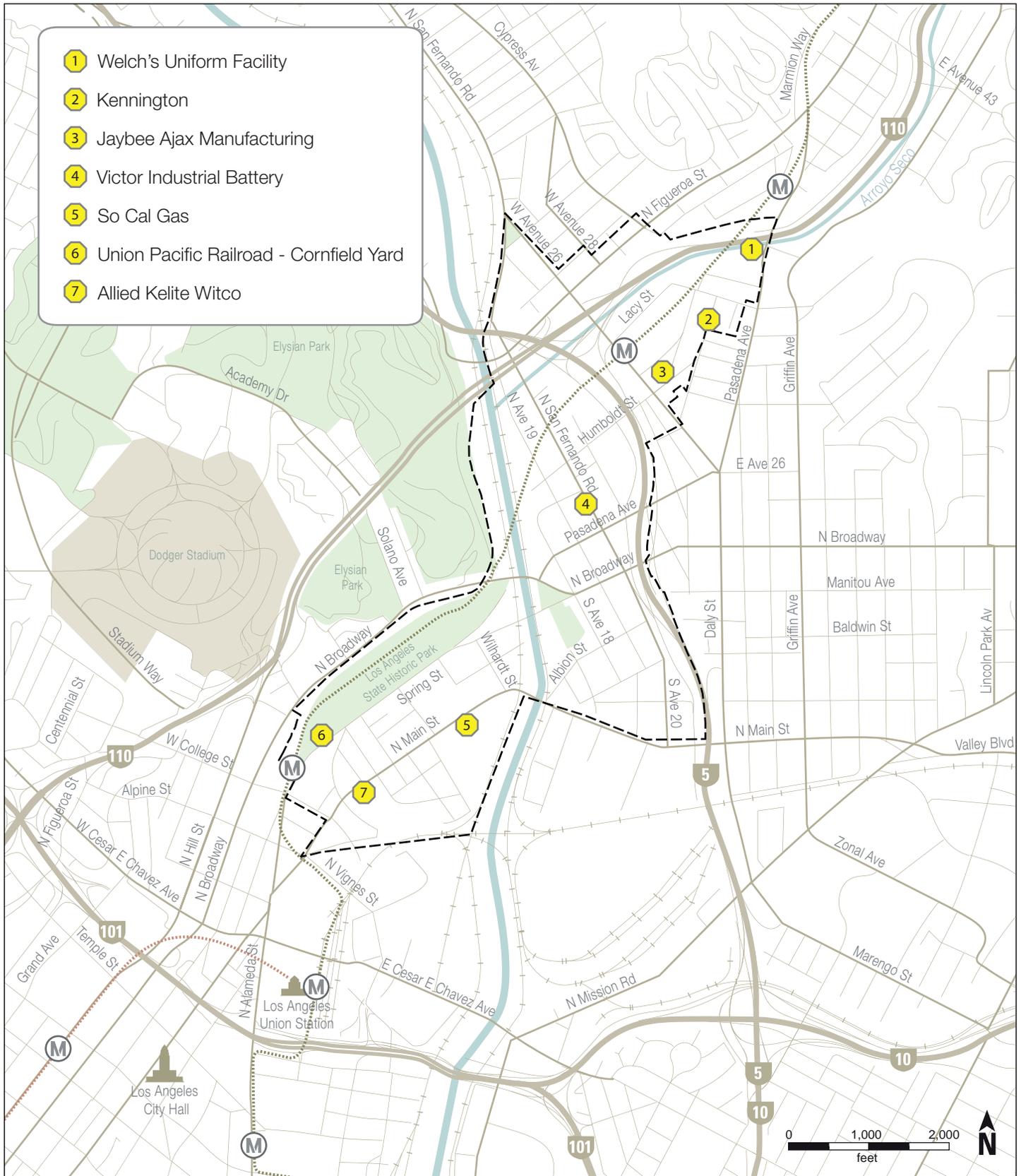
-  Case Open Cleanup Sites
-  Case Closed Cleanup Sites
-  Project Area Boundary
-  Metro Line and Station

Source

California State Water Resources Control Board (Geotracker), 2012.

Figure 10-4
Cleanup Sites — Open and Closed Cases

Cornfield Arroyo Seco Specific Plan
Final EIR
April 24, 2012



Legend

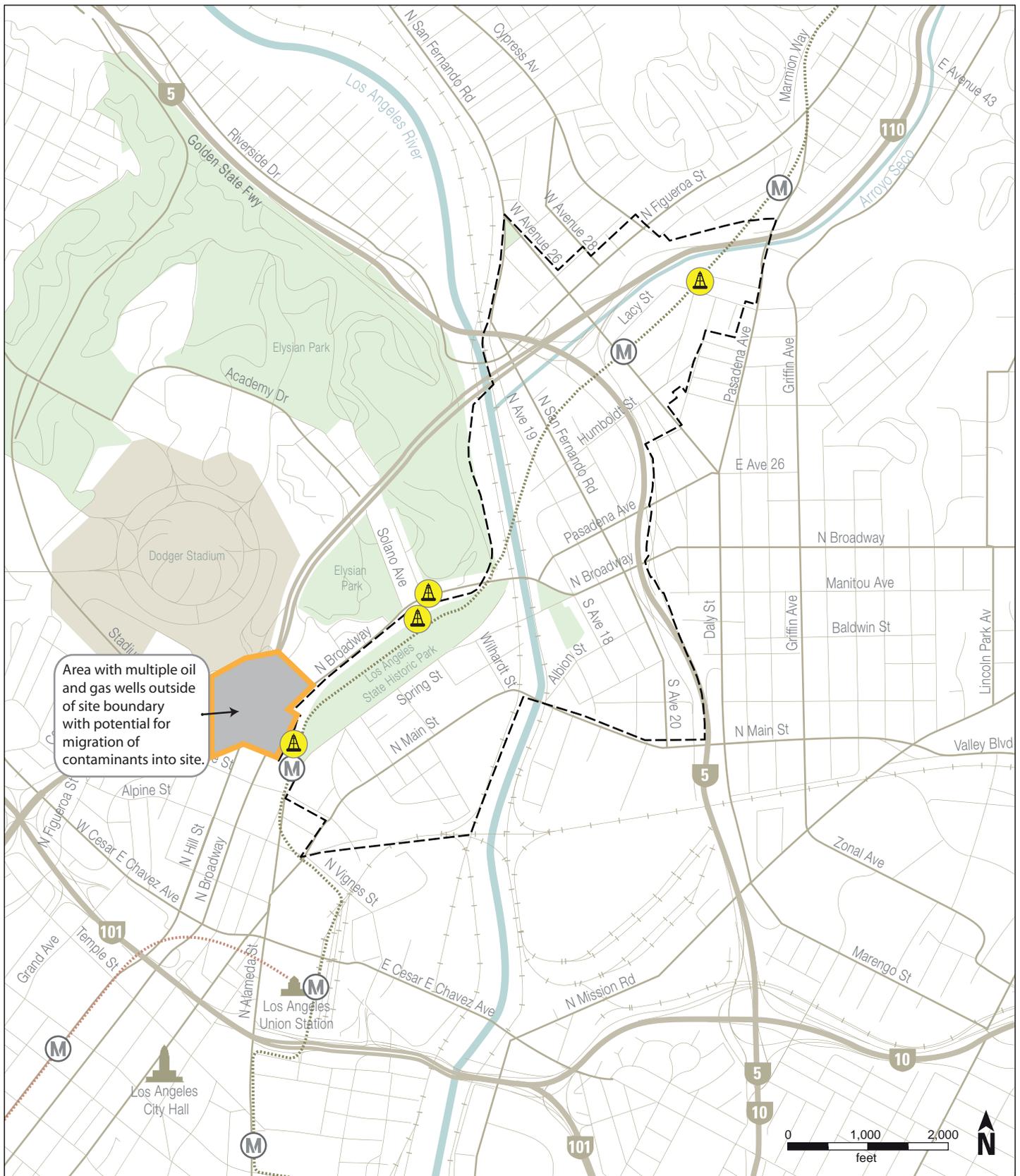
-  Voluntary Cleanup Site
-  Project Area Boundary
-  Metro Line and Station

Source

California Department of Toxic Substances Control (Envirostor), 2012.

Figure 10-5
Voluntary Cleanup Sites

Cornfield Arroyo Seco Specific Plan
Final EIR
April 24, 2012



Legend

-  Oil or Gas Well
-  Project Area Boundary
-  Metro Line and Station

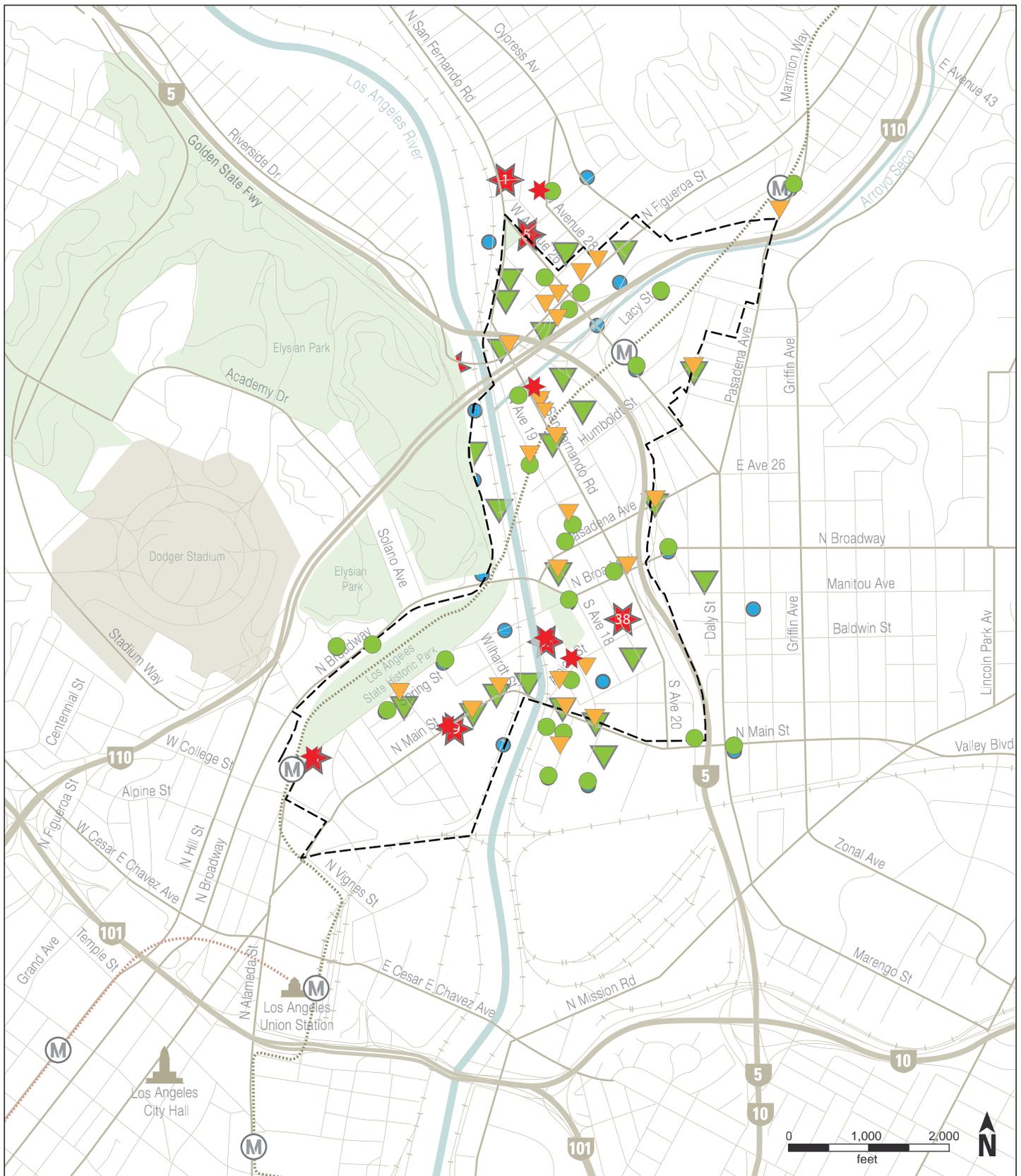
Source

California Department of Conservation (DOMS), 2012.

Figure 10-6
Oil and Gas Wells

Cornfield Arroyo Seco Specific Plan
Final EIR
April 24, 2012





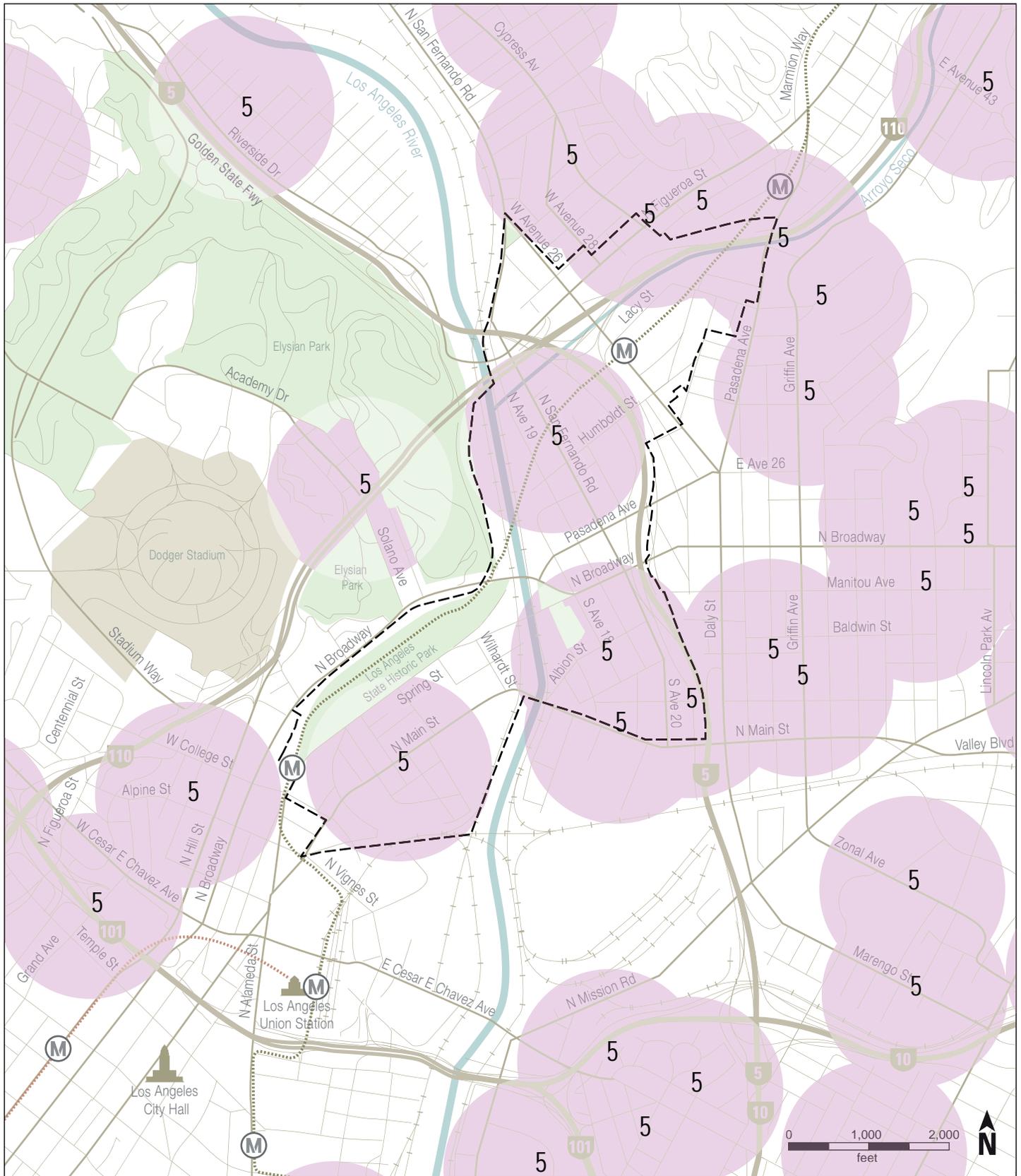
Legend

- ★ Leaking Underground Storage Tank Case Open
- Leaking Underground Storage Tank Case Closed
- ▼ Permitted UST
- Project Area Boundary
- Ⓜ Metro Line and Station

Source

California Department of Conservation (DOMS), 2012.

Figure 10-7
Permitted and Leaking
Underground Storage Tanks (USTs)
 Cornfield Arroyo Seco Specific Plan
 Final EIR
 April 24, 2012



Legend

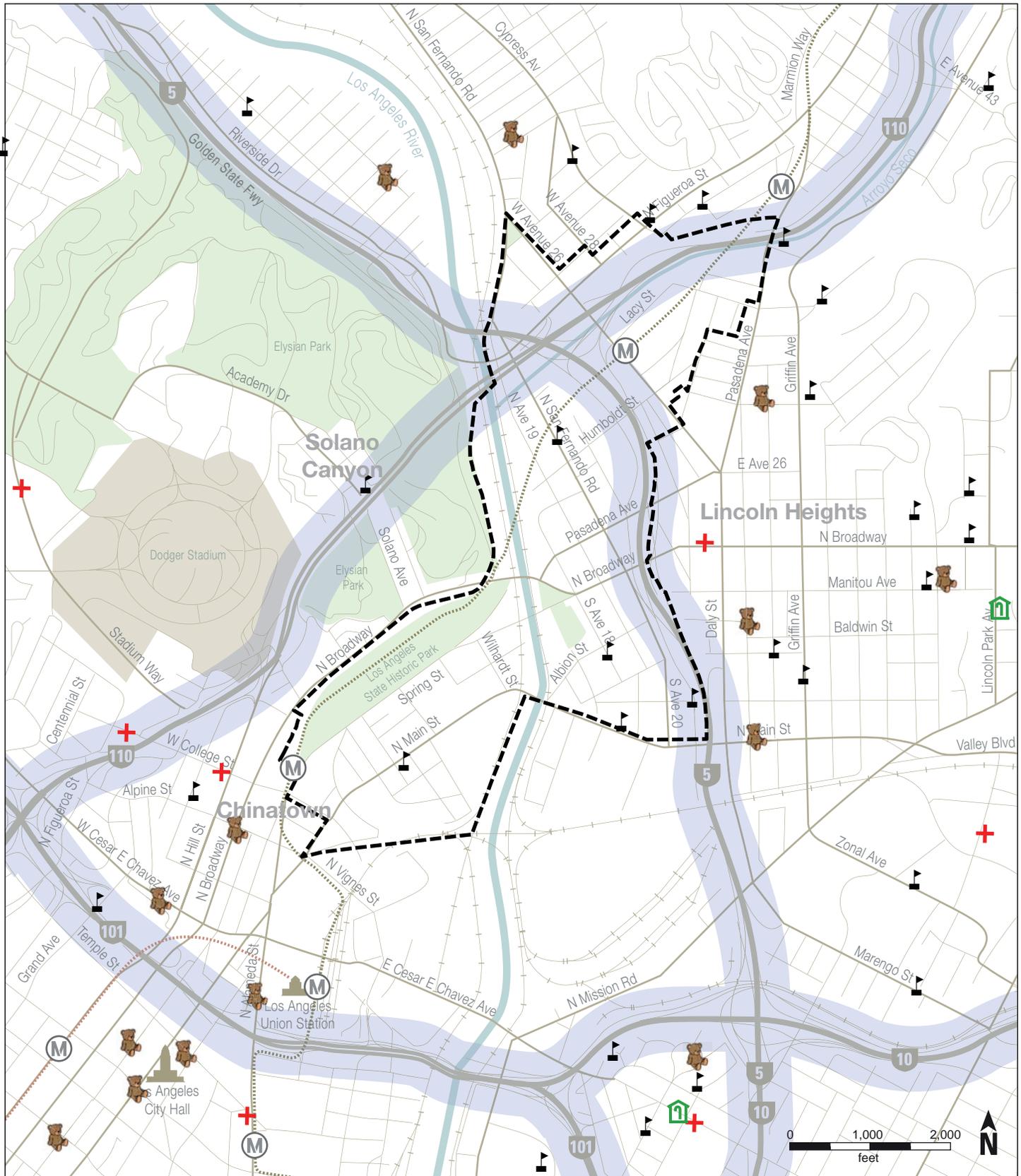
- 5 School
- 1/4-mile Buffer
- Project Area Boundary
- M Metro Line and Station

Source

City of Los Angeles, 2010.

Figure 10-8
Schools with 1/4-mile Buffer

Cornfield Arroyo Seco Specific Plan
Final EIR
April 24, 2012



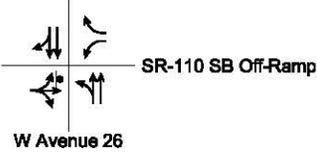
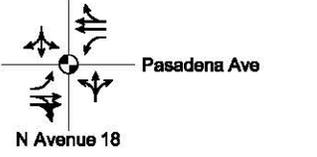
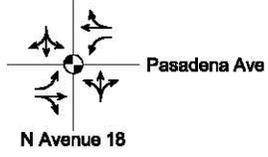
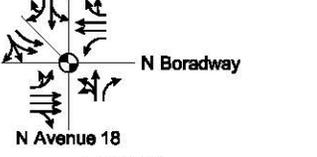
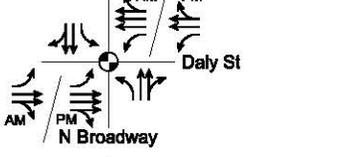
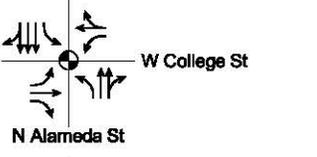
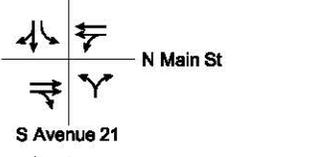
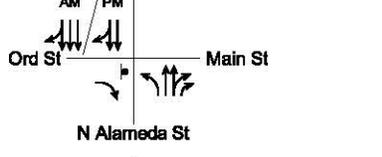
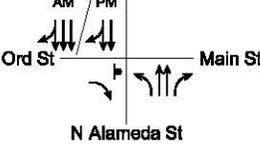
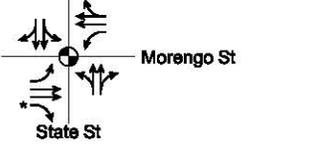
Legend

-  Old Age / Retirement Facility
-  Medical Facility
-  Public and Private Schools
-  Day Care
-  300-foot Buffer from Freeway
-  Project Area Boundary
-  Metro Line and Station

Sources

City of Los Angeles, 2011; Arup, 2011.

Figure 12-1
Location of Sensitive Receptors
in the Vicinity of the Site
 Cornfield Arroyo Seco Specific Plan
 Final EIR
 August 10, 2012

	EXISTING (2009) CONDITIONS	CUMULATIVE (2035) NO PROJECT CONDITIONS	CUMULATIVE (2035) PLUS PROJECT CONDITIONS
5. W Avenue 26 & SR-110 SB Off-Ramp		Same As Existing Conditions	Same As Existing Conditions
14. N Avenue 18 & Pasadena Ave		Same As Existing Conditions	
20. N Avenue 18 & N Spring St/N Broadway		Same As Existing Conditions	Same As Existing Conditions
22. Daly St & N Broadway		Same As Existing Conditions	Same As Existing Conditions
26. N Alameda St & W College St		Same As Existing Conditions	Same As Existing Conditions
30. S Avenue 21 & N Main St		Same As Existing Conditions	Same As Existing Conditions
33. N Alameda St & N Main St/Ord St			Same As Cumulative (2035) No Project Conditions
38. State St & Morengo St		Same As Existing Conditions	Same As Future Conditions

Legend

- ⊙ Signalized
- * Defacto Right-Turn
- ▮ Stop Control
- OV. Right-turn Overlap
- Free Free Right-Turn



Table 2.D-1 (Partial): Intersection Traffic Operations Existing (2009) Plus Proposed Alternative Conditions

Intersection	Traffic Control	Existing (2009)				Existing (2009) plus Proposed Alternative			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
		V/C or Delay ¹	LOS ²	V/C or Delay ¹	LOS ²	V/C or Delay ¹	LOS ²	V/C or Delay ¹	LOS ²
5. West Avenue 26 & SR 110 Southbound Off-Ramp	Side-Street Stop	1247.49	FE	>200	F	>200 <u>19.8</u>	FE	>200	F
14. North Avenue 18 & Pasadena Avenue	Signalized	<i>0.482609</i>	BA	0.422	A	<i>0.8117</i>	D	<i>0.70915</i>	C
22. Daly Street & North Broadway	Signalized	0.66654	B	0.635591	AB	<i>0.77322</i>	C	<i>0.75519</i>	C
26. North Alameda Street & West College Street	Signalized	0.430	A	0.51609	A	0.202	A	0.44839	A
33. North Alameda Street & North Main Street/Ord Street	Side-Street Stop	<i>15.39</i>	C	1312.6	B	27.340	ED	<i>17.3</i>	C
38. State Street & Marengo Street	Signalized	0.49588	A	0.4754	A	0.56429	A	0.44106	A

Notes: ¹ For all-way stop-controlled intersections, the overall average intersection control delay is reported in seconds per vehicle.
 For side-street stop control, the average control delay for the worst movement is reported in seconds per vehicle.

² Level of Service based on CMA methodology for signalized intersections and HCM unsignalized methodology for unsignalized intersections.

Shading indicates that the intersection operates at LOS E or F.

Bold-italic indicates a significant impact.

Source: Fehr & Peers, 20120.

5.0 SUPPLEMENTAL ANALYSIS OF THE PROJECT REVISIONS

A. INTRODUCTION

Subsequent to the release of the Original DEIR, the City proposed modifications to the Proposed Alternative (Revised Proposed Alternative). Section 15088.5 of the CEQA Guidelines requires that where changes are made to a project description, an analysis must be prepared to determine whether such changes would determine whether such changes constitute “significant” new information. CEQA Guidelines. Section 15088.5 provides that new information is “significant” that results in new significant environmental impacts which were not identified in the Original DEIR, or a substantial increase in the severity of impacts previously identified in the Original DEIR. Pursuant to Section 15088.5(a) of the CEQA Guidelines, if new information is determine to be “significant”, then re-circulation of the supplemental analysis is required. This Section provides a description of the proposed modifications included in the Revised Proposed Alternative and evaluates the changes relative to the Original Proposed Alternative pursuant to Section 15088.5 of the CEQA Guidelines.

B. DESCRIPTION OF PROJECT REVISIONS

Chapter 2, Project Description of the Original DEIR described the Proposed Alternative (Original Proposed Alternative). Section 2.2.1.3 of the Original DEIR provided the a general summary description of the Original Proposed Alternative’s new hybrid industrial land use designations (Urban Village, Urban Innovation, Urban Center), and the Greenway designation (see the Zoning District Map on page 5-3, originally presented as Figure 2-1 of the Original DEIR), in addition to describing the program-wide design standards, Bonus FAR Program, Transfer FAR Program and other land use regulatory requirements. A Draft of the Cornfield Arroyo Seco Specific Plan (Draft CASP), referred to as the Proposed Alternative, included all the regulatory language that specified precise details regarding the type of uses permitted, use limitations, FAR limitations, development incentives, etc. that would occur in the Project Area. The Draft CASP was available for review at the time of the release of the Original DEIR at the website, <https://sites.google.com/site/cornfieldsla/index>. The website was included in both the two different Notice of Preparations (NOP) that were released on February 27, 2009 and December 15, 2010.

Section 17.6.2.1 of the Original DEIR described a Modified Project Alternative, which was proposed to offer a modified scenario of designating Block 52 in the Urban Innovation Zone in contrast to the Greenway Zone as proposed under the Original Project Alternative. The Original DEIR provided a qualitative comparison of impacts of the Modified Project Alternative relative to the Original Proposed Alternative in Table 17-3. As stated below, the Modified Project Alternative has been incorporated as part of the revisions of the Revised Proposed Alternative as

described below. The following is a description of all the changes, including the incorporation of the Modified Project Alternative that are encompassed in the Revised Proposed Alternative.

Bonus FAR - Density Bonus Option

The Revised Proposed Alternative modifies and clarifies how a Density Bonus Option would apply in the Project Area for projects in the Urban Innovation, Urban Center, and Urban Village zones. The Density Bonus Option specifies additional permitted FAR and incentives available to development projects that include affordable housing. The Revised Proposed Alternative differentiates the FAR increases and incentives between the publically funded and non-publically funded programs, though in either program the FAR maximums do not exceed what was already established in the Original DEIR. Table 5.1 shows the Base FAR and the range of FAR maximums as they would apply in the corresponding zones under the Revised Proposed Alternative. Within the River Buffer Areas that overlap with the Urban Innovation, Urban Center, and Urban Village zones, Table 5.1 clarifies that for projects taking the Density Bonus Option, a 2:1 Max FAR would apply in the Urban Village Zone, a 1.8:1 Max FAR would apply in the Urban Innovation Zone, and a 1.8:1 Max FAR would apply in the Urban Center Zone.

Table 5.1 – FAR Table

Density	Greenway	Urban Village	Urban Innovation	Urban Center
Base FAR	1.5	3.0*	3.0	3.0
Base FAR within River Buffer Areas	1.5	1.5	1.5	1.5
Max FAR**	1.5	3 to 5	3 to 4	3 to 6
Max FAR within River Buffer Areas	1.5	1.5	1.5	1.5
Max FAR within River Buffer Areas with Density Bonus	NA	2	1.8	1.8

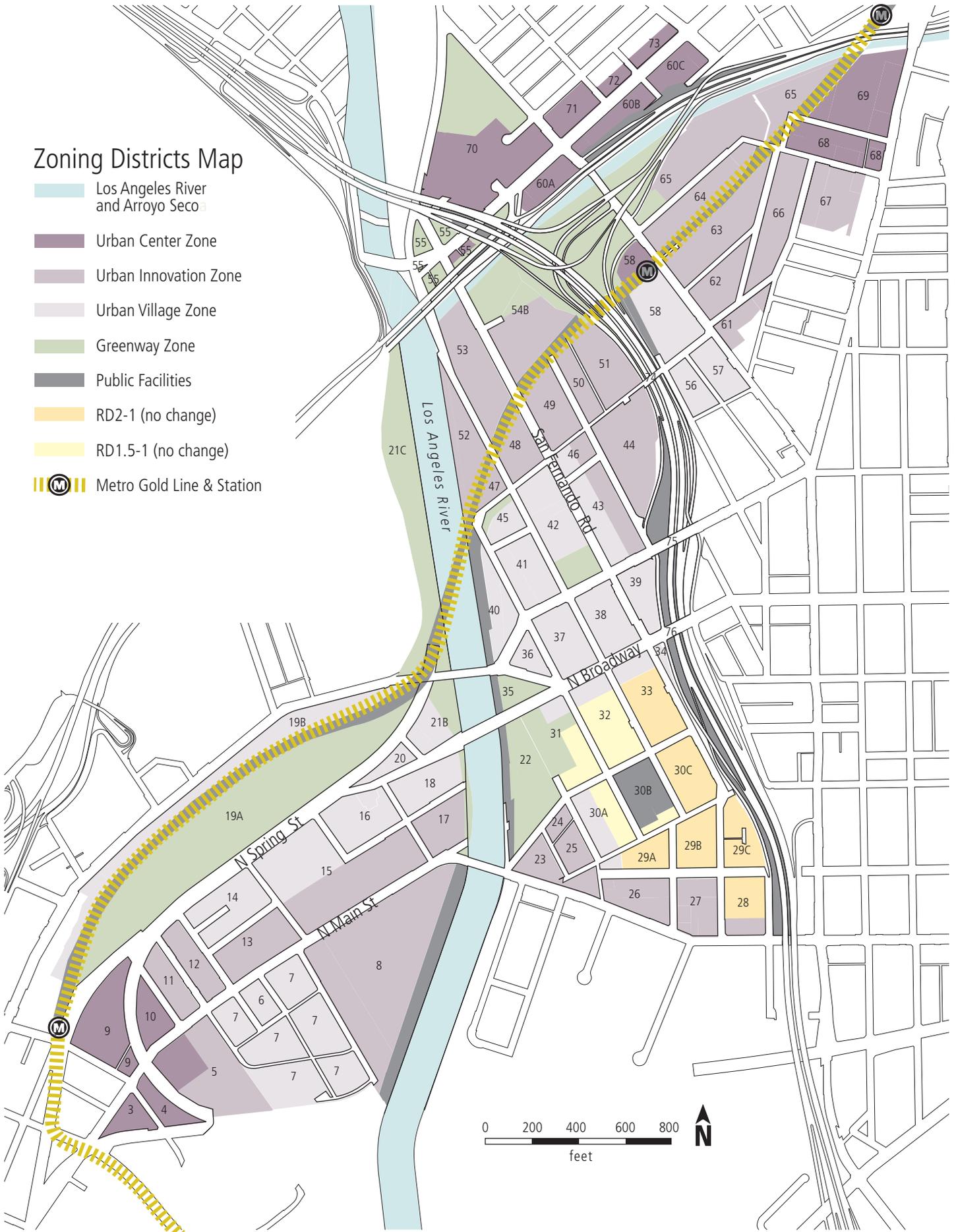
* Projects with more than 15 units of residential are limited to a Base FAR of 2.5 unless the residential portion of the project is equal to or less than 75% of the FAR.

** Varies- see FAR Map

In addition to specifying the Max FAR allotted under the Density Bonus Option, several on-menu incentives that would apply under the Density Bonus Option are specified in the Revised Proposed Alternative. The on-menu incentives include allowing up to 100 percent residential use in the Urban Village Zone, a 15-foot maximum height increase and the ability to exclude public common areas and unenclosed areas of a building from the total floor area calculation.

Zoning Districts Map

-  Los Angeles River and Arroyo Seco
-  Urban Center Zone
-  Urban Innovation Zone
-  Urban Village Zone
-  Greenway Zone
-  Public Facilities
-  RD2-1 (no change)
-  RD1.5-1 (no change)
-  Metro Gold Line & Station



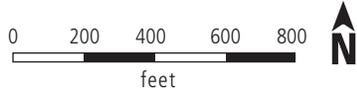
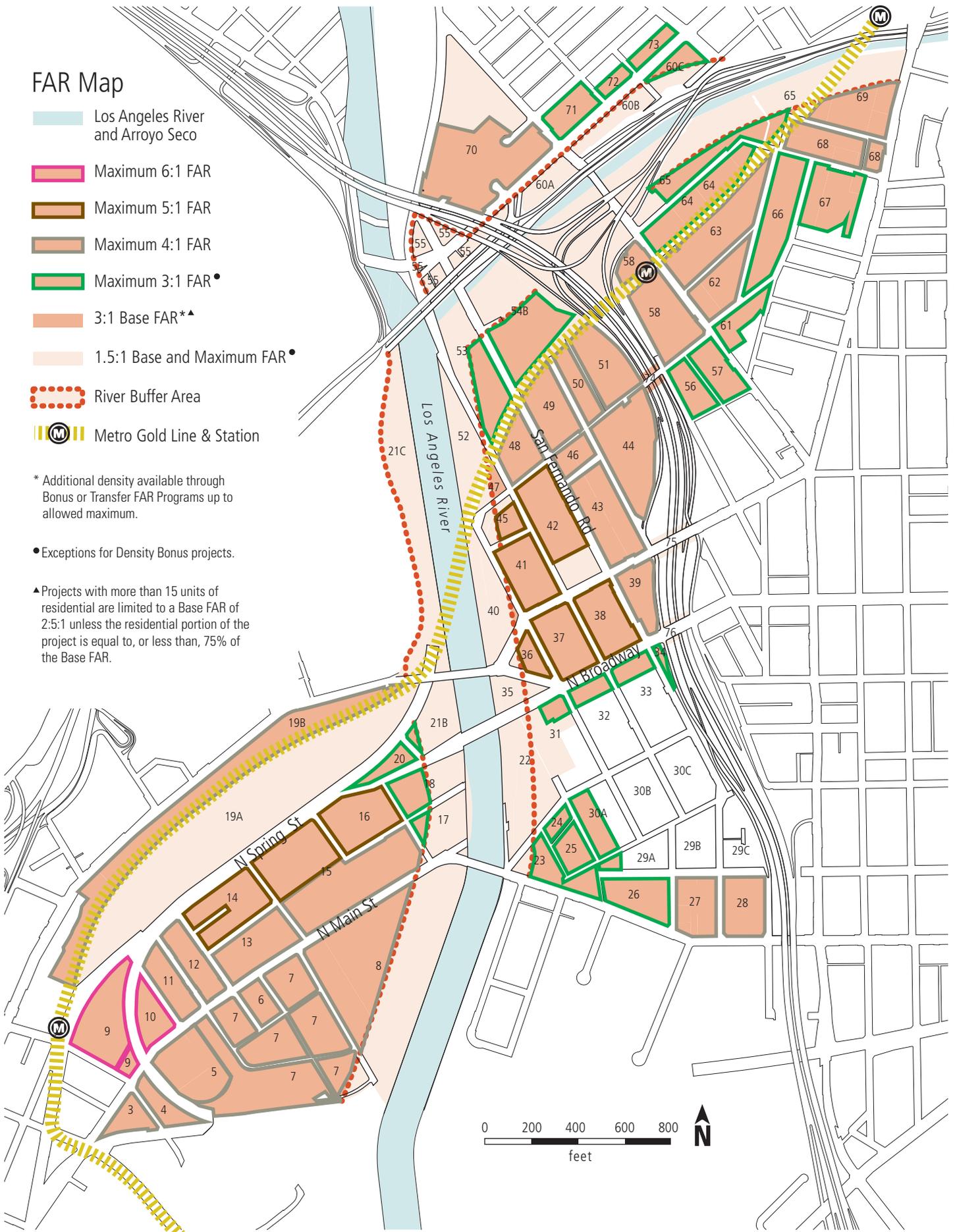
FAR Map

-  Los Angeles River and Arroyo Seco
-  Maximum 6:1 FAR
-  Maximum 5:1 FAR
-  Maximum 4:1 FAR
-  Maximum 3:1 FAR •
-  3:1 Base FAR*▲
-  1.5:1 Base and Maximum FAR •
-  River Buffer Area
-  Metro Gold Line & Station

* Additional density available through Bonus or Transfer FAR Programs up to allowed maximum.

• Exceptions for Density Bonus projects.

▲ Projects with more than 15 units of residential are limited to a Base FAR of 2.5:1 unless the residential portion of the project is equal to, or less than, 75% of the Base FAR.



While the Density Bonus Option is included as a new feature in the Revised Proposed Alternative, the City density bonus program, as permitted under Section 12.22 A.25 of the Los Angeles Municipal Code (LAMC) was already assumed to apply under the Original Proposed Alternative, and accounted for in the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR. The main difference between the Density Bonus Option in the Revised Proposed Alternative and the City’s density bonus program that was already available under the Original Proposed Alternative is that the 3:1 Base FAR shall be reduced for projects within the Urban Village Zone in order to provide greater incentive for development projects to include affordable housing. This is described in more detail below.

Base FAR Reductions

The Original Proposed Alternative established a Base FAR that would apply prior to any floor area incentives and transfers pursuant to the Transfer or Bonus FAR Programs. As shown in the FAR Map on Page 5-5, a Base FAR of 3:1 would apply to most of the Project Area with the exception of properties within the River Buffer Area and Greenway Zone, where a 1.5:1 FAR would apply. To further encourage residential projects to include units that are affordable to extremely-low, very-low, and/or low-income households, the Base FAR was modified for certain projects that include residential developed in the Project Area where a Base 3:1 FAR would otherwise apply. Projects with more than 15 units of residential are limited to a base of 2.5:1 FAR, unless the residential portion of the project is equal to, or less than 75 percent of the Base FAR. This incentivizes projects that do include a higher portion of residential units to elect the Density Bonus Option in order to realize the FAR maximums permitted in the Original Proposed Project. As stated above, this modification in Base FAR does not change the Maximum FAR limits as previously proposed in the Original Proposed Alternative as shown in Table 5.1 and the FAR Map on Page 5-5, and does not change the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR.

Table 5.2 - Density Bonus FAR-Publically Funded Projects

Affordability Level/Location	Greenway	Urban Village	Urban Innovation	Urban Center
20% Affordable	NA	3.375:1	3.15:1 (max of .6:1 FAR Residential)	3.15:1 (max of .6:1 FAR Residential)
100% Affordable	NA	4:1*	3.45:1 (max of .9:1 FAR Residential)	3.45:1 (max of .9:1 FAR Residential)
20% Affordable River Buffer	NA	2:1	1.6:1 (max of .3:1 residential)	1.6:1 (max of .3:1 residential)
100% Affordable River Buffer	NA	2:1	1.8:1 (max of .525:1 residential)	1.8:1 (max of .525:1 residential)

*Projects in an area with a Max FAR of 3:1 shall be limited to a 3.375:1 Density Bonus FAR

Table 5.3 - Density Bonus FAR-Not Publically Funded Projects

Location	Greenway	Urban Village	Urban Innovation	Urban Center
Not River Buffer*	NA	4:1	3.45:1 (max of .9:1 FAR Residential)	3.45:1 (max of .9:1 FAR Residential)
River Buffer	NA	2:1	1.8:1 (max of .525:1 residential)	1.8:1 (max of .525:1 residential)

*Projects in an area with a Max FAR of 3:1 shall be limited to a 3.375:1 Density Bonus FAR

Community Benefits Option

The Community Benefits Option was revised to reduce the FAR incentive (1) from allowing 10 square feet of floor area for each square foot of publically accessible open space above the required 15 percent to allowing 3 square feet of floor area for each additional square foot of publically accessible open space above the required 15 percent; and (2) from allowing 20 square feet of floor area for each square foot of community facilities to allowing 6 square feet of floor area for each square foot of community facilities. The Community Benefits Option was also revised so that projects that included more than 15 residential units needed to apply the Density Bonus Option in order to be eligible for the Community Benefits Option. The FAR Bonus available to non-residential projects has not changed under the Revised Proposed Alternative. The overall Max FAR provided by both of these programs individually or combined do not exceed the total Max FAR that could have been awarded under the Original Proposed Alternative and the modification does not change the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR.

Maximum FAR Reductions

The maximum floor area available through the Transfer of FAR (TFAR) Program has been reduced on a number of blocks in order to better protect prevailing views in the Project Area. Block 19B, north of the Los Angeles State Historic Park was previously proposed to be permitted a maximum 5:1 FAR and now is permitted to be a maximum 4:1 FAR under the TFAR Program. Blocks 3, 4 and 5 on the furthest southwestern portion of the Project Area was previously proposed to be permitted a maximum 6:1 FAR and now is permitted to be a maximum 4:1 FAR under the TFAR Program. Lastly, Block 58, which comprises several

properties southeast adjacent to the I-5 and SR-110 interchange, was previously proposed to be permitted a maximum 5:1 FAR and now is permitted to be a maximum 4:1 FAR under the TFAR Program. The reductions in Max FAR available to the TFAR program amount to a combined approximate 1,188,500 sf. However, these blocks could still be developed up to the 4:1 maximum FAR allowed through the Bonus FAR Program and the overall use assumptions described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR would not change as a result of the Max FAR reductions.

Modification to Open Space Requirement

The open space provisions of the Original Proposed Project would require all projects in the Hybrid Industrial land use designations to provide 15 percent of the lot area as open space, and that for the open space to be publically accessible for projects on a lot size greater than or equal to 15,000 square feet. The Revised Proposed Project modifies the open space requirement to require that projects within the Hybrid Industrial land use designations to provide one square foot of common open space for every 16 square feet of residential floor area, and a 1 square foot of common open space for every 48 square feet of non-residential floor area. There is no requirement for publically accessible open space for projects in the Hybrid Industrial land use designation; however, total open space reduction of 25 percent is available if the open space is accessible to the public. However, while the Revised Proposed Project modifies the open space requirements, the maximum lot coverage requirement has not changed maintaining the overall percentage of a site to not be included in the buildable FAR.

Block 52 and Block 50/51 in the Urban Innovation Zone

The proposed zoning for Block 52 was changed from Greenway Zone in the Original Proposed Alternative and is now proposed as the Urban Innovation Zone under the Revised Proposed Alternative. This revision was previously described as the Modified Project Alternative in Section 17.6.2.1 and shown in Figure 17-1 in the Original DEIR, and the corresponding impacts were compared relative to the Proposed Alternative in Table 17-3 in the Original DEIR.

The allowable uses in the Urban Innovation Zone were modified to include the Entertainment, Exhibit and Cultural use category as an ancillary use restricted to Block 52 (see District Map), these uses are not permitted anywhere else in the Urban Innovation Zone in the Project Area. Ancillary uses in the Project Area are restricted to 10 percent of the on-site principle use, and for the combined maximum floor area of all ancillary uses exceed a FAR of 1.0.

The allowable use in the Urban Innovation Zone specific to Blocks 50/51 (see the Zoning District Map on page 5-3) was modified to include the Religious Institutions use category.

Block 70 in the Greenway Zone

The Conservation, Environmental and Social Service Organizations use category was added as an allowable principal use in both the Urban Innovation Zone (previously not permitted) and the Urban Center Zone (previously limited as an ancillary use) and permitted in the Greenway Zone restricted to Block 70 (currently comprised of the Los Angeles River Center - see the Zoning District Map on page 5-3).

Other Modified Uses in the Project Area

The Conservation, Environmental and Social Service Organizations use category was added as an allowable principal use in the Urban Center Zone (previously limited as an ancillary use) and permitted as ancillary in the Urban Innovation Zone (previously not permitted).

The Revised Proposed Alternative establishes a maximum area limitation of 15,000 square feet (sf) for each retail establishment in the Urban Village Zone, where the Original Proposed Alternative established a limit of 20,000 sf per retail establishment in the Urban Village Zone.

The full list of permitted uses that correspond to the proposed zones within the Project Area is provided on page 36 of the Draft CASP included as Appendix A5 of the FEIR. The changes in permitted land use of the Revised Proposed Alternative do not lead to a substantial change of the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR.

C. Analysis of Plan Modifications Pursuant to Section 15088.5 of the CEQA Guidelines

CEQA Guidelines Section 15088.5 (a) provides that when changes are made to a project description they should be analyzed by the lead agency to determine whether the changes constitute “significant new information.” In the context of a change to a project description, significant new information includes information that: (1) a new significant environmental impact would result from the change in the project or from a new mitigation measure proposed to be implemented; or (2) a substantial increase in the severity of an environmental impact would result from the change in the project unless mitigation measures are adopted that reduce the impact to a level of insignificance.

CEQA Guidelines Section 15088.5 (e) provides that recirculation of an EIR is not required where the changes do not constitute significant new information, but the lead agency’s conclusions must be supported by substantial evidence in the administrative record. The analysis contained in Section D evaluates the project revisions proposed by the City to determine if (1) a new significant environmental impact would result from the change in the project or from a new

mitigation measure proposed to be implemented; or (2) a substantial increase in the severity of an environmental impact would result from the change in the project unless mitigation measures are adopted that reduce the impact to a level of insignificance. This supplementary analysis is also intended to provide documentation for the administrative record required by Section 15088.5 (e).

Table 5-4, below, presents a summary of the analysis in Section D. In summary, this analysis demonstrates that the modifications included in the Revised Proposed Alternative do not create either (1) a new significant environmental impact resulting from the change in the project or from a new mitigation measure proposed to be implemented; or (2) a substantial increase in the severity of an environmental impact resulting from the change in the project unless mitigation measures are adopted that reduce the impact to a level of insignificance. Therefore, recirculation of the EIR is not required.

Table 5-4 Comparison of Original Proposed Alternative and Revised Proposed Alternative Impacts

Impact Area	Level of Impact under Original Proposed Alternative	Level of Impact under Revised Proposed Alternative	Comparison of Level of Impact under Revised Proposed Alternative to Original Proposed Alternative
Land Use	Less than Significant	Less than Significant	Minor increase in impact conclusion.
Transportation	Significant and Unavoidable:	Significant and Unavoidable:	Minor increase in impact conclusion.
Visual Resources	Less than Significant	Less than Significant	Less impacts than under Original Proposed Alternative.
Earth Resources	Less than Significant with Mitigation	Less than Significant with Mitigation	No change in impact conclusion.
Hydrology	Less than Significant with Mitigation	Less than Significant with Mitigation	No change in impact conclusion.
Biological Resources	Less than Significant with Mitigation	Less than Significant with Mitigation	No change in impact conclusion.
Cultural Resources	Less than Significant with Mitigation	Less than Significant with Mitigation	No change in impact conclusion.
Hazardous Materials	Less than Significant with Mitigation	Less than Significant with Mitigation	No change in impact conclusion.
Noise and Vibration			
Construction	Significant and Unavoidable	Significant and Unavoidable	No change in impact conclusion.
Operation	Significant and Unavoidable	Significant and Unavoidable	Minor increase in impact conclusion.
Air Quality			
Construction	Significant and Unavoidable	Significant and Unavoidable	No change in impact conclusion.
Operation	Significant and Unavoidable	Significant and Unavoidable	Minor increase in impact conclusion.
Health Risks Due to Toxic Air Contaminant (TAC) emissions	Significant and Unavoidable	Significant and Unavoidable	Minor increase in impact conclusion.

Population, Housing, and Employment	Less than Significant	Less than Significant	Less impacts than under Original Proposed Alternative.
Public Services			
Police	Less than Significant	Less than Significant	Minor increase in impact conclusion.
Fire	Less than Significant	Less than Significant	Minor increase in impact conclusion.
Library	Less than Significant	Less than Significant	Minor increase in impact conclusion.
Schools	Less than Significant	Less than Significant	Minor increase in impact conclusion.
Park	Less than Significant	Less than Significant	Minor increase in impact conclusion.
Utilities			
Water	Less than Significant	Less than Significant	Minor increase in impact conclusion.
Wastewater	Less than Significant	Less than Significant	Minor increase in impact conclusion.
Energy	Less than Significant	Less than Significant	Minor increase in impact conclusion.
Solid Waste	Less than Significant	Less than Significant	Minor increase in impact conclusion.
Energy and Greenhouse Gas	Less than Significant	Less than Significant	Minor increase in impact conclusion.

Source: Los Angeles Department of City Planning

D. Environmental Impact Analysis of the Revised Plan

The following analysis reviews each section of the environmental impact analysis of the FEIR with respect to the modifications of the Revised Proposed Alternative and identifies whether a new significant environmental impact would result from the changes proposed in the Revised Proposed Alternative, whether a substantial increase in the severity of a previously identified environmental impact would result from the changes proposed in the Revised Proposed Alternative, and whether any new mitigation measures are necessary as a result of the changes proposed in the Revised Proposed Alternative. For each impact category, the same mitigation measures identified in the FEIR continue to be recommended for the Revised Proposed Alternative. The following analysis also provides a discussion comparing the Revised Proposed Alternative to the on-site development alternatives analyzed in the FEIR.

Impacts Analyzed in the Draft EIR

Land Use

The Original DEIR identified conflicts between light-industrial, commercial, and residential uses as a potential land use impact. The Original Proposed Alternative would permit light-industrial, commercial, and residential uses to be developed in close proximity, which has the potential to

be significant because the current predominant Industrial and Public Facilities Generalized Land Uses categories do not permit residential. However, Original Proposed Alternative included amendments to the Central City North, Northeast Los Angeles, and Silverlake/Echo Park/Elysian Valley community plans that will establish the Hybrid Industrial Land Use designation to permit controlled use of residential, commercial, community-serving, and industrial uses that meet specific regulatory standards. In Section 3.3.1, the Original DEIR discussed several assumptions by which the regulatory components of the Original Proposed Alternative contains policies aimed at avoiding impacts related to land use compatibility issues. The Original Proposed Alternative assumptions include development that will enhance connections between established communities, including Lincoln Heights, Chinatown, and Solano Canyon, through building and streetscape design standards enhancing streetscape quality and visual surveillance of streets and other public spaces; development that reduces automobile travel and increases support for City of Los Angeles and regional transit service, as well as pedestrian activity and bicycle use; and arrangement of land uses across the Project Area and mix of uses intended to reduce both mobile and stationary source GHG emissions through increasing transit ridership, facilitating the development of new technology businesses, and requiring that the operation of residential, commercial, and industrial buildings is conducted in an energy- and water-efficient manner.

The modifications in the Revised Proposed Alternative include a change of a zone from a Greenway Zone to Urban Innovation Zone for Block 52 as previously described as the Modified Project Alternative in the Original DEIR; permitting of new uses in locations that would be permitted for similar type of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. The on-menu incentives of the Density Bonus Option include allowing up to 100 percent residential use in the Urban Village Zone, a 15-foot maximum height increase and the ability to exclude public common areas and unenclosed areas of a building from the total floor area calculation. The Revised Proposed Alternative would not substantially change the assumptions referred to in Section 3.3.1 of the Original DEIR or the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR.

The designation of Block 52 under the Urban Innovation Zone was already disclosed and evaluated in Section 17.6.2.1 and Table 17-3 of the Original DEIR under the Modified Project Alternative. The Original DEIR concluded that the Modified Project Alternative would result in a minor increase in land use impacts due to additional land use intensity, but would not result in a new significant impact. In addition, Block 52 is located in the River Buffer Area and would still be limited to the same 1.5:1 FAR as applied in the Greenway Zone indicating that increases in land use intensity as the result of this change would be associated with the use rather than the intensity of use. Regardless this change will not result in a new significant land use impacts or

increase the severity of an existing impact as previously evaluated in the Original DEIR.

Just as the Original Proposed Alternative, the regulations included in the Revised Proposed Alternative will act as the applicable zoning plan implemented by the City of Los Angeles, and will not conflict with applicable land use plans, policies, and regulations.

Further, specific project proposals will be required to comply with applicable environmental and health regulations. No Changes are proposed to the Massing and Street Wall Standards or the Active Frontage Policy as proposed in the Original Proposed Alternative. Land use impacts will continue to be less than significant under the Revised Proposed Alternative.

Transportation

The transportation impacts as a result of the Original Proposed Alternative were found to be significant and unavoidable in the Original DEIR for 9 intersections after mitigation. The following analysis evaluates the land use assumptions of the Revised Proposed Alternative as compared to Original Proposed Alternative to determine if the land use changes proposed in the Revised Proposed Alternative would result in a new transportation impacts or a substantial increase in the severity of transportation impacts as evaluated in the Original Draft EIR.

Traffic forecasts of the Original Proposed Alternative were developed by a travel demand forecasting (TDF) model based on the 2008 Regional Transportation Plan (RTP) TDF model of the Southern California Association of Governments (SCAG). The Original Proposed Alternative TDF model provided additional land use and roadway network detail, along with modified traffic analysis zone (TAZ) structure to provide a more refined analysis of the potential impacts of the Proposed Alternative within the study area. The land use assumptions that applied to the TDF model were informed by the maximum square footage of residential, commercial (office and retail), industrial and institutional land uses permitted under the Proposed Alternative, which were in turn used to estimate a 2035 forecast of population, jobs and housing based on maximum possible growth within the Project Area as a result of the Original Proposed Alternative.

The modifications in the Revised Proposed Alternative include a change of a zone from a Greenway Zone to Urban Innovation Zone for Block 52 as previously described as the Modified Project Alternative in the Original DEIR; permitting of new uses in locations that would be permitted for similar type of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. The on-menu incentives of the Density Bonus Option include allowing up to 100 percent

residential use in the Urban Village Zone, a 15-foot maximum height increase and the ability to exclude public common areas and unenclosed areas of a building from the total floor area calculation.

While the Density Bonus Option is included as a new feature in the Revised Proposed Alternative, the City density bonus program, as permitted under Section 12.22 A.25 of the Los Angeles Municipal Code (LAMC) was already assumed to apply under the Original Proposed Alternative, and accounted for in the program land use assumptions described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR. While the Density Bonus Option may increase the production of affordable housing relative to market rate housing, it would not substantially change the land use assumptions in the Original DEIR in regards to overall residential units permitted (see discussion on the City density bonus program in Section B) or introduce residential uses in areas that were not already identified under the Original Proposed Alternative.

These land use program assumptions formed the basis for the Proposed Alternative 2035 TDF model, which informed the traffic impact analysis of the Original DEIR. The main difference between the Density Bonus Option in the Revised Proposed Alternative and the City's density bonus program that was already available under the Original Proposed Alternative is that the 3:1 Base FAR shall be reduced for projects within the Urban Village Zone in order to provide greater incentive for development projects to include affordable housing. Any increase in affordable housing in the Project Area over what was assumed in the Original DEIR land use assumptions due to higher participation in the Density Bonus Option/Bonus FAR Program would serve to reduce vehicle trips and vehicle miles travelled (VMT) further by providing work force housing in proximity to major employment centers thereby contributing further to restoring job/housing balance, as well as promoting higher transit participation based on observed ridership trends of low-income residents.¹

As specified in Section B, the Revised Proposed Alternative reduced the Max FAR allowed through the Transfer FAR (TFAR) Program by a combined approximate 1,188,500 sf in Blocks 3, 4, 5, 19B and 58. However, these blocks can still be developed up to the 4:1 maximum FAR allowed through the Bonus FAR Program and would not change the overall use assumptions described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR, and would not increase traffic impacts as compared to the Original Proposed Alternative.

The Revised Proposed Alternative also expanded some of the allowable uses in the Project Area from what was proposed in the Original Proposed Alternative. However, these changes would amount to the permitting of new uses in locations that would be permitted for similar types of uses under the Original Proposed Alternative. The modifications in the Revised Proposed

¹ Pollack, S., Bluestone, B., Billingham, C. (2010) *Maintaining Diversity in America's Transit-Rich Neighborhoods: tools for Equitable Neighborhood Change*. Dukakis Center for Urban and Regional Policy (Pollock et al., 2010)

Alternative include a change of a zone from a Greenway Zone to Urban Innovation Zone for Block 52. The transportation impacts due to the designation of Block 52 under the Urban Innovation Zone were already compared relative to the Original Proposed Alternative in Section 17.6.3 and Table 17-3 of the Original DEIR, see Modified Project Alternative discussion above. The Original DEIR concluded that the Modified Project Alternative would result in a minor increase in transportation impacts due to additional land use intensity, but would not result in a new significant impact. In addition, Block 52 is located in the River Buffer Area and would still be limited to the same 1.5:1 FAR as applied in the Greenway Zone indicating that increases in land use intensity as the result of this change would be associated with the use rather than the intensity of use. However, according to the Institute of Transportation Engineers (ITE), Trip Generation manual, 8th edition, 2008 (ITE manual) the Greenway Zone would also permit relatively high traffic generating uses such as restaurants, as compared to the uses permitted in the Urban Innovation Zone such as industrial and ancillary office uses.² In addition, the industrial and ancillary office uses would have greater participation in transit ridership than some of the uses allowed in the Greenway Zone since transit usage rates are generally shown to comprise higher work-related trips than recreational trips. Furthermore, application of TDM strategies included as Mitigation Measure Transportation 1 would apply to most uses allowed in the Urban Innovation Zone which would further reduce potential impacts resulting from the change in designation. LADOT typically awards a trip reduction credits based on transit supportive features and mixed use strategies.³ This change will not result in a new significant transportation impact or result in a substantial increase in the severity of an existing transportation impact as previously evaluated in the Original DEIR.

The Revised Proposed Alternative also expands the uses in the Urban Innovation Zone for specific blocks to include the Entertainment, Exhibit and Cultural use category as an ancillary use restricted to Block 52, and Religious Institutions use category restricted to Blocks 50/51. Under the Original Proposed Alternative, the proposed Urban Innovation Zone would allow principal uses that include light manufacturing and assembly, research and development, while ancillary uses that include commercial office, restaurants and other retail would be allowed in the same zone. The ITE manual provides some data on entertainment uses such as multiplex movie theatres, though the type of entertainment uses that would be approved as ancillary use in Block 52 would be of a more limited nature such as live theatre or one or two screen movie theatre. It should also be noted of the periodic nature of events for the entertainment and cultural uses that would be permitted for Block 52 of the Revised Proposed Alternative as compared to the other uses that they would replace. Further, the land use revision to Block 52 is consistent with the current use of the property that includes a community theatre.

² According to the ITE manual, a full service sit down restaurant (Land Use Code 932) will generate an average of 18.49 trips per 1,000 sf week day P.M. peak hour generator trips while the corresponding week day P.M. peak hour generator trips for light industrial (Land Use Code 110), single tenant office (Land Use Code 715), and (Land Use Code 220) are 1.08 trips per 1,000 sf, 1.73 trips per 1,000 sf, and 0.67 trips per unit respectively. Source: Institute of Transportation Engineers (ITE), Trip Generation manual, 8th edition, 2008.

³ City of Los Angeles Department of Transportation, Traffic Study Policies and Procedures. May 2012.

The trip generation of religious uses that would be an approved use in Blocks 50/51 would generally be higher in the off-peak hours and not expected to exceed the light industrial or commercial office uses or mixed residential uses permitted in the Urban Innovation Zone.⁴

The Conservation, Environmental and Social Service Organizations use category was added as an allowable principal use in the Urban Center Zone (previously limited as an ancillary use) and permitted as ancillary in the Urban Innovation Zone (previously not permitted) and permitted in the Greenway Zone restricted to Block 70 (currently comprised of the Los Angeles River Center). The trip generation of uses that include conservation, environmental and social service organizations also do not differ from similar uses (office uses in the Urban Innovation Zone and Urban Center Zone) or would be less than the restaurant uses already permitted in the Greenway Zone under the Original Proposed Alternative.

The reduction of area limitation to 15,000 sf per each retail establishment in the Urban Village Zone instead of the 20,000 sf as permitted in the Original Proposed Alternative would further restrict large format formula retail which would likely reduce trip demand.

Since permitting of new uses in the identified locations under the Revised Proposed Alternative would amount to similar or less trip generation characteristics than the similar type of uses permitted under the Original Proposed Alternative, the changes will not result in a new significant transportation impact or result in a substantial increase in the severity of an existing impact as previously evaluated in the Original DEIR.

Visual Resources

The general site development assumptions for the Revised Proposed Alternative is substantially the same as for the Original Proposed Alternative. The modifications include permitting of new uses in locations that would be permitted for similar types of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; the modification of open space requirement, and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. As stated in Section B, Block 19B, north of the Los Angeles State Historic Park was previously proposed to be permitted a maximum 5:1 FAR and now is permitted to be a maximum 4:1 FAR under the Transfer or Bonus FAR Programs. This would further protect views to the hillside area known as Elysian Park to the northwest of the Project Area.

⁴ Applying the trip rates from the ITE manual, a church (Land Use Code 560) will generate an average of 84 week day P.M. peak hour generator trips for a 328,249 sf site while the corresponding week day P.M. peak hour generator trips for light industrial (Land Use Code 110) would be 354 trips for the same area.

While the Revised Proposed Project modifies the open space requirements, the maximum lot coverage requirement has not changed maintaining the overall percentage of a site to be not included in the buildable FAR. The modification will not change the impact conclusion on visual resources.

Accordingly, it is concluded that significant new visual resource impacts would not result from the modifications proposed in the Revised Proposed Alternative, and new mitigation measures are not necessary with respect to visual resources as a result of modifications proposed in the Revised Proposed Alternative.

Earth Resources

The general site development assumptions for the Revised Proposed Alternative are substantially the same as for the Original Proposed Alternative. The modifications include permitting of new uses in locations that would be permitted for similar types of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; the modification of open space requirement, and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. Accordingly, it is concluded that significant new earth/geological resource impacts would not result from the modifications proposed in the Revised Proposed Alternative, and new mitigation measures are not necessary with respect to earth/geological resources as a result of modifications proposed in the Revised Proposed Alternative. The same mitigation measures identified in the Original DEIR are recommended for the Revised Proposed Alternative.

Hydrology and Water Quality

The general site development assumptions for the Revised Proposed Alternative are substantially the same as for the Original Proposed Alternative. The modifications include permitting of new uses in locations that would be permitted for similar type of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; the modification of open space requirement, and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. Accordingly, it is concluded that significant new hydrology and water quality impacts would not result from the modifications proposed in the Revised Proposed Alternative, and new mitigation measures are not necessary with respect to hydrology and water quality as a result of modifications proposed in the Revised Proposed Alternative. The same mitigation measures identified in the Original DEIR are recommended for the Revised Proposed Alternative.

Biological Resources

The general site development assumptions for the Revised Proposed Alternative are substantially the same as for the Original Proposed Alternative. The modifications include permitting of new uses in locations that would be permitted for similar type of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; the modification of open space requirement, and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. Accordingly, it is concluded that significant new biological resource impacts would not result from the modifications proposed in the Revised Proposed Alternative, and new mitigation measures are not necessary with respect to biological resources as a result of modifications proposed in the Revised Proposed Alternative. The same mitigation measures identified in the Original DEIR are recommended for the Revised Proposed Alternative. Therefore, the Revised Project Alternative would not result in a new biological resource impact as evaluated in either the Original DEIR.

Cultural Resources

The general site development assumptions for the Revised Proposed Alternative are substantially the same as for the Original Proposed Alternative. The modifications include permitting of new uses in locations that would be permitted for similar type of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; the modification of open space requirement, and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. Accordingly, it is concluded that significant new cultural resource impacts would not result from the modifications proposed in the Revised Proposed Alternative, and new mitigation measures are not necessary with respect to cultural resources as a result of modifications proposed in the Revised Proposed Alternative. The same mitigation measures identified in the Original DEIR are recommended for the Revised Proposed Alternative.

Hazardous Materials

The general site development assumption for the Revised Proposed Alternative is substantially the same as for the Original Proposed Alternative. The modifications include permitting of new uses in locations that would be permitted for similar type of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; the modification of open space requirement, and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. The Revised

Proposed Alternative does not propose new uses that would potentially store or handle hazardous materials, nor lead to the release of hazardous materials through the redevelopment of additional sites than were evaluated in the Original Proposed Alternative. Accordingly, it is concluded that significant new hazardous material impacts would not result from the modifications proposed in the Revised Proposed Alternative, and new mitigation measures are not necessary with respect to hazardous materials as a result of modifications proposed in the Revised Proposed Alternative. The same mitigation measures identified in the Original DEIR are recommended for the Revised Proposed Alternative. Therefore, the Revised Project Alternative would not result in a new hazardous materials impact as evaluated in either the Original DEIR.

Air Quality

Construction

The construction air quality impacts as a result of the Original Proposed Alternative were found to be significant and unavoidable in the RP-DEIR after mitigation. The general site development assumption for the Revised Proposed Alternative is substantially the same as for the Original Proposed Alternative as there have been no increases to the overall FAR permitted. As a result, the Revised Project Alternative would not result in new construction air quality impacts or a substantial increase in an existing construction air quality impact as evaluated in either the Original DEIR or RP-DEIR, and all the existing Mitigation Measure Air Quality 11 and Mitigation Measure Air Quality 12 indentified in the RP-DEIR to address air quality impacts will continue to apply under the Revised Proposed Alternative.

Operation

The operational air quality emissions as a result of the Original Proposed Alternative were found to be significant and unavoidable in the Original DEIR after mitigation. The following analysis evaluates the land use assumptions of the Revised Proposed Alternative as compared to Original Proposed Alternative to determine if the land use changes proposed in the Revised Proposed Alternative would result in a new operational air quality impact or a substantial increase in the severity of operational air quality impacts as evaluated in the Original Draft EIR.

Since operational air quality emissions are attributed to mobile source emissions, substantial increase in operational emissions would correspond to a substantial increase in vehicle trips as a result of the changes contained in the Revised Proposed Alternative. As shown above in the transportation analysis, the revisions due to the Density Bonus Option under the FAR Bonus Program, the targeted reductions in Base and Maximum permitted FAR, and the permitting of new uses in select locations would not result in increases in vehicle trip generation, and therefore would not contribute to a new significant impact or substantial increase to an existing significant

impact from operation air quality emissions. Mitigation Measure Air Quality 1 would continue to apply under the Revised Project Alternative.

The operation air quality impacts due to the designation of Block 52 under the Urban Innovation Zone were already compared relative to the Original Proposed Alternative in Section 17.6.3 and Table 17-3 of the Original DEIR, see Modified Project Alternative discussion above. The Original DEIR concluded that the Modified Project Alternative would result in a minor increase in air quality impacts due to additional land use intensity, but would not result in a new significant impact. The only change in operational air quality emissions would be due to increased mobile source emissions attributed to the greater land use intensity. However, as described pursuant to transportation impacts above, development on Block 52 will be limited to the same 1.5:1 FAR as was under the Original Proposed Alternative indicating that increases in land use intensity as the result of this change would be associated with the use rather than the intensity of use. However, the industrial and ancillary office uses that would be permitted in the Urban Innovation Zone would be expected to support higher transit ridership than uses permitted in the Greenway Zone under the Original Proposed Alternative. Furthermore, application of TDM strategies included as Mitigation Measure Transportation 1 would apply to most uses allowed in the Urban Innovation Zone which would further reduce potential increase in traffic impacts of the change in designation. Since the increases in traffic levels are expected to be minimal as a result in the changes proposed to Block 52, it follows that the change would not contribute to a substantial increase in mobile source emissions, and therefore the re-designation of Block 52 would not lead to a substantial increase in operational air quality impacts as previously evaluated in the Original DEIR.

Therefore, as modest increases in mobile source emissions of the Revised Proposed Alternative would be minimal in comparison to the Original Proposed Alternative, the changes will not result in a new significant operational air quality impacts or result in a substantial increase in the severity of an existing impact as previously evaluated in the Original DEIR.

Health Risks Due to Toxic Air Contaminate (TAC) emissions

The health risks due to TAC emissions as a result of the Original Proposed Alternative were found to be significant and unavoidable in the Original DEIR after mitigation. The following analysis evaluates the land use assumptions of the Revised Proposed Alternative as compared to Original Proposed Alternative to determine if the land use changes proposed in the Revised Proposed Alternative would result in new health risks due to TAC emission impacts or a substantial increase in the severity of health risks due to TAC emission impacts as evaluated in the Original DEIR.

The modifications in the Revised Proposed Alternative that include a change of a zone from a Greenway Zone to Urban Innovation Zone for Block 52 as previously described above in Section B would permit uses in Block 52 previously not allowed under the Original Proposed Alternative that include light industrial, repair and maintenance facilities as principal uses; other ancillary uses such as warehousing and storage, and residential; and automobile fueling stations and waste management uses on a conditional use basis. Some of the uses have the potential to generate TACs, though they would be subject to the same permitting and reporting programs overseen by the South Coast Air Quality Management District (SCAQMD) as any other use in the Project Area and would not be shown to contribute a substantial increase in TAC emissions in compared to the assumptions under the Original Proposed Project.

The modifications in the Revised Proposed Alternative that include permitting of new uses in select locations as described in Section B would introduce uses of similar characteristics in regard to sensitive receptors and potential TAC sources as was evaluated under the Original Proposed Alternative. Revised Proposed Alternative would permit entertainment and cultural uses in Block 52 next to the Los Angeles River, which is not a known TAC source. The Revised Proposed Alternative would permit conservation, environmental and social service organizations on the portion Block 70 in the Greenway Zone. This site is consistent with the use of the site by the Los Angeles River Center. The Revised Proposed Alternative would permit religious uses in the Urban Innovation Zone in Block 50/51, which is located adjacent to the I-5 Freeway, a known TAC source. However, Block 50/51 would be subject to Mitigation Measure Air Quality 2 which prohibits the location of a sensitive receptor within 500 feet of a freeway unless a Health Risk Assessment (HRA) is prepared that demonstrates that health risks can be mitigated to an acceptable level as defined in Mitigation Measure Air Quality 2. As the uses in Block 50/51 would be subject to the same mitigation requirements and standards as applied in the Original Proposed Alternative, there would not be a substantial increase in health risks due to TAC emissions as was evaluated in the Original DEIR, and the RP-DEIR.

Other modifications in the Revised Proposed Alternative include the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. The overall reduction in Max FAR does not substantially change the development assumptions as was evaluated in the Original DEIR and RP-DEIR as this affects a limited amount of blocks that would be available as receiver sites. However, Block 58 (identified in the Revised Project Alternative where the Max FAR available under the TFAR program was reduced) is adjacent to the I-5 and SR-110 interchange and reductions in Max FAR would further reduce potential future sensitive receptors exposed to the freeway TAC sources as compared to the Original Proposed Alternative.

The Density Bonus Option, in coordination with the reduction in Base FAR in the Urban Village Zone for certain residential projects and the reduction in the marginal Bonus FAR allotted for Community Benefit Option are devised to prioritize and increase the incentive for developers to provide affordable housing in the Project Area. While this may increase the production of affordable housing relative to market rate housing, the Density Bonus Option included in the Revised Proposed Alternative would not substantially change the land use assumptions in the Original DEIR and RP-DEIR in regards to overall residential units permitted (see discussion on the City density bonus program) or introduce residential uses in areas that were not already identified under the Original Proposed Alternative.

In conclusion, the Revised Proposed Alternative would not result in a new significant impact or result in a substantial increase in the severity of an existing impact regarding health risk due to TACs as previously evaluated in the Original DEIR and the RP-DEIR. Additionally, all the existing measures, Mitigation Measure Air Quality 2 through Mitigation Measure Air Quality 10 identified in the RP-DEIR to address health risk impacts will continue to apply under the Revised Proposed Alternative.

Noise and Vibration

Construction

The construction noise and vibration impacts as a result of the Original Proposed Alternative were found to be significant and unavoidable in the RP-DEIR after mitigation. The general site development assumption for the Revised Proposed Alternative is substantially the same as for the Original Proposed Alternative as there have been no increases to the overall FAR permitted. As a result, the Revised Project Alternative would not result in new construction noise and vibration impacts or a substantial increase in the severity of an existing construction noise and vibration impact as evaluated in either the Original DEIR or RP-DEIR, and the existing Mitigation Measure Noise and Vibration 1 identified in the Original DEIR and RP-DEIR to address construction noise and vibration will continue to apply under the Revised Proposed Alternative.

Operation

A significant impact would result if the Revised Proposed Alternative led to a significant new operational noise and vibration impact that was not previously disclosed in the Original DEIR, or substantially increase the severity of a previously identified operational noise impact. A new significant operational noise and vibration impact would occur if the land use assumptions in the Revised Proposed Alternative differed substantially from the Original Proposed Alternative, and

that difference led to the exceedance or substantial increase in the severity of noise and vibration impacts that were not previously disclosed in the Original DEIR.

Chapter 12 of the Original DEIR disclosed that significant impacts to operational noise and vibration would result due to the possibility of introducing sensitive land uses within an existing industrial area. The Original DEIR stated that the inclusion of mitigation measures and performance standards, included as part of the Original Proposed Alternative, would help to reduce potential impacts; however, due to the existing conditions it was found that in some instances, noise standards could be exceeded and the potential impacts were considered to be significant and unavoidable.

The modifications in the Revised Proposed Alternative that include a change of a zone from a Greenway Zone to Urban Innovation Zone for Block 52 as previously described above in Section B would permit uses in Block 52 previously not allowed under the Original Proposed Alternative that include light industrial, repair and maintenance facilities as principal uses; other ancillary uses such as warehousing and storage, and residential uses. Some of the uses have the potential to generate operational noise or would include sensitive land uses. However, both noise generating and noise sensitive uses would be subject to the same mitigation measures and Specific Plan compliance standards as any other use in the Project Area and would not be shown to contribute a substantial increase in operational noise and vibration compared to the assumptions under the Original Proposed Project. The designation of Block 52 under the Urban Innovation Zone was already evaluated in comparison to the Original Proposed Alternative in Section 17.6.2.1 and Table 17-3 of the Original DEIR under the Modified Project Alternative. The Original DEIR concluded that the Modified Project Alternative would result in a minor increase in noise and vibration impacts due to additional land use intensity, but would not result in a new significant impact.

The modifications in the Revised Proposed Alternative that include permitting of new uses in select locations as described in Section B would introduce uses of similar characteristics in regard to sensitive receptors and potential noise sources as was evaluated under the Original Proposed Alternative. The Revised Proposed Alternative would permit entertainment and cultural uses in Block 52 next to the Los Angeles River as an ancillary use such as small theatre and would not permit large entertainment venues that would produce outside noise sources. In addition, loudspeakers are restricted in the Urban Innovation Zone under the Revised Proposed Alternative. The Revised Proposed Alternative would permit conservation, environmental and social service organizations on Block 70 in the Greenway Zone. This site is consistent with the use of the site by the Los Angeles River Center. The Revised Proposed Alternative would permit religious uses in the Urban Innovation Zone in Block 50/51, which is located adjacent to the I-5 Freeway, a known traffic noise source. However, proposed religious uses for Block 50/51 would be subject to Mitigation Measure Noise and Vibration 1d and the established maximum noise

and vibration levels which would require an applicant to prepare an acoustical analysis and incorporate features to reduce noise and vibration impacts due to traffic noise. As the uses in Block 50/51 would be subject to the same mitigation requirements and standards as applied in the Original Proposed Alternative, there would not be a substantial increase in operational noise and vibration impacts as was evaluated in the Original DEIR, or the RP-DEIR.

Other modifications in the Revised Proposed Alternative include the reduction in Max FAR allowed in certain locations referenced above; the reduction in Bonus FAR allotted for the Community Benefit Option; and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. The overall reduction in Max FAR does not substantially change the development assumptions as was evaluated in the Original DEIR and RP-DEIR as this affects a limited amount of blocks that would be available as receiver sites. However, Block 58 (identified in the Revised Project Alternative where the Max FAR available under the TFAR program was reduced) is adjacent to the I-5 and SR-110 interchange and reductions in Max FAR would further reduce potential future sensitive receptors exposed to the freeway traffic noise sources as compared to the Original Proposed Alternative.

The Density Bonus Option, in coordination with the reduction in Base FAR in the Urban Village Zone for certain residential projects and the reduction in the marginal Bonus FAR allotted for Community Benefit Option are devised to prioritize and increase the incentive for developers to provide affordable housing in the Project Area. While this may increase the production of affordable housing relative to market rate housing, the Density Bonus Option included in the Revised Proposed Alternative would not substantially change the land use assumptions in the Original DEIR and RP-DEIR in regards to overall residential units permitted (see discussion on the City density bonus program) or introduce residential uses in areas that were not already identified under the Original Proposed Alternative.

As discussed above, the Revised Proposed Alternative would not substantially change the land use assumptions referred to in Section 3.3.1 of the Original DEIR or the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR as they relate to operational noise and vibration impacts. Mitigation Measure Noise and Vibration 1a, 1b, 1c and 1d identified in the Original DEIR to address construction noise and vibration in addition to the proposed noise performance standards will continue to apply under the Revised Proposed Alternative. Future projects will be required to conform to the noise and vibration standards that are established as part of the Revised Proposed Project (see Section 2.7 of the Draft CASP in Appendix A5). The noise standards includes a number of provisions such as the prohibition of loudspeakers within any portion of the Hybrid Industrial land use designations and establishes maximum noise and vibration levels permitted in future uses. Therefore, the Revised Proposed Alternative will not result in a new significant operational noise impact or a substantial increase

in an existing operational noise and vibration impact as previously evaluated in the Original DEIR.

Population, and Housing, and Employment

The Original Draft EIR evaluated whether the Original Proposed Alternative would induce substantial population growth in the Project Area, either directly or indirectly, by allowing new homes and businesses and the extension of roads or other infrastructure. The Original Draft EIR found impacts to be less than significant. The development that would result from implementation of the Original Proposed Alternative would be designed to help accommodate a portion of the growth the City is expected to experience over the next 25-30 years, and reduces the need to construct housing units elsewhere, especially in areas that are currently undeveloped. The development that would result from the implementation of the Proposed Alternative would represent an increase of less than one half of a percent in citywide population growth between 2007 and 2025, and would occur in an area that is in close proximity to major employment centers thereby minimizing the need to build new infrastructure for supportive services. The Original DEIR found that focusing growth within the Project Area would encourage the implementation of new facilities and infrastructure improvements that would correct existing deficiencies, modernize older systems, and improve the functionality of the Project Area while adding to the utility of public spaces. The Original DEIR found that the additional 26,551 persons that could be added to the City of Los Angeles' population would not directly result in a substantial population growth over and above that which is currently anticipated in the General Plan.

The Original Draft EIR found that implementation of the Original Proposed Alternative would displace some existing businesses and jobs, but not in substantial numbers necessitating the construction of replacement facilities; and it would not result in substantial increases in distances traveled. The Original Proposed Alternative was also found not to result in the displacement of existing housing, at any affordability level.

The modifications in the Revised Proposed Alternative include a change of a zone from a Greenway Zone to Urban Innovation Zone for Block 52 as previously described as the Modified Project Alternative in the Original DEIR, permitting of new uses in locations that would be permitted for similar type of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in Bonus FAR allotted for the Community Benefit Option; and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. The on-menu incentives of the Density Bonus Option include allowing up to 100 percent residential use in the Urban Village Zone, a 15-foot maximum height increase and the ability to exclude public common areas and unenclosed areas of a building from the total floor area calculation.

While the Density Bonus Option is included as a new feature in the Revised Proposed Alternative, the City density bonus program, as permitted under Section 12.22 A.25 of the Los Angeles Municipal Code (LAMC) was already assumed to apply under the Original Proposed Alternative, and accounted for in the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR and Table 5-5 below. The main difference between the Density Bonus Option in the Revised Proposed Alternative and the City’s density bonus program that was already available under the Original Proposed Alternative is that the 3:1 Base FAR shall be reduced for projects within the Urban Village Zone in order to provide greater incentive for development projects to include affordable housing.

Table 5-5 – Original DEIR Program Assumptions

Program	Original Proposed Alternative
Population	31,855
Jobs	10,546
Dwelling Units	8,776
Jobs to Housing Balance	1.20
Residential (square feet)	10,844,830
Retail (square feet)	508,425
Commercial/Office (square feet)	1,702,147
Light Industrial/Research and Development (square feet)	6,571,654
Institutional Uses (square feet)	200,000
Parks and Open Space (acres)	69

Source: Los Angeles Department of City Planning

In providing greater incentive for development projects to include affordable housing, the Revised Proposed Alternative is found to have greater conformance with General Plan Framework Element objectives and policies devised to increase the supply of affordable housing, such as Policies 4.1.1, 4.1.2, 4.1.6 and 4.2.1.

In addition, the modifications in the Revised Proposed Alternative include a change from a Greenway Zone to Urban Innovation Zone for Block 52. The designation of Block 52 under the Urban Innovation Zone was already disclosed and evaluated in Section 17.6.2.1 and Table 17-3 of the Original DEIR under the Modified Project Alternative. The Original DEIR concluded that the Modified Project Alternative would result in a minor increase in population, housing and employment impacts due to additional land use intensity, but would not result in a new significant impact.

Public Services and Recreation Facilities

A significant impact would result if the Revised Proposed Alternative led to a significant new impact to public services that were not previously disclosed in the Original DEIR. Impacts to public services are largely determined by a two step process by first determining 1) if increases in population would increase demand on designated public services beyond the existing capacity

and would degrade service levels, and 2) if the degradation of service levels result in the provision of new public service facilities that would by their construction, result in a substantial adverse physical impacts. The 2006 L.A. CEQA Guidelines provides screening criteria that indicates when further study is warranted regarding a potential impact. The screening criteria for public services are if a project will induce an additional 75 residential units for police services, schools and libraries, while the screening criteria of parks and recreation is an additional 50 units. A revision in the project that would fall below these screening criteria would not contribute to a new significant impact.

The designation of Block 52 under the Urban Innovation Zone was already evaluated in comparison to the Original Proposed Alternative Section 17.6.2.1 and Table 17-3 of the Original DEIR under the Modified Project Alternative. The 146,845-square-foot site (3.4 acres) is located within the Plan's River Buffer Area, which means that site development would be limited to a 1.5 FAR. Under both the Original and Revised Proposed Alternative, residential use is permitted in the Urban Innovation Zone up to a maximum of 15 percent of the total floor area with a maximum of 33,0040 sf of residential use permitted in Block 52 pursuant to the Revised Proposed Alternative. This would permit approximately 28 to 40 additional residential units than were previously accounted for in the Original Proposed Project, and would fall below the screening criteria for a potential impact of public services established by the L.A. CEQA Threshold Guidelines. This is consistent with the Original DEIR conclusion that the Modified Project Alternative would result in a minor increase in public service and recreation facilities impacts due to additional land use intensity, but would not result in a new significant impact.

The Density Bonus Option, in coordination with the reduction in Base FAR in the Urban Village Zone for certain residential projects and the reduction in the marginal Bonus FAR allotted for Community Benefit Option are devised to prioritize and increase the incentive for developers to provide affordable housing in the Project Area. While this may increase the production of affordable housing relative to market rate housing, the Density Bonus Option included in the Revised Proposed Alternative would not substantially change the land use assumptions in the Original DEIR and RP-DEIR in regards to overall residential units permitted (see discussion on the City density bonus program in Section B) or introduce residential uses in areas that were not already identified under the Original Proposed Alternative.

While the Density Bonus Option is included as a new feature in the Revised Proposed Alternative, the City density bonus program, as permitted under Section 12.22 A.25 of the Los Angeles Municipal Code (LAMC) was already assumed to apply under the Original Proposed Alternative, and accounted for in the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR.

As stated in Section B, the Revised Proposed Project modifies the open space requirement to require that projects within the Hybrid Industrial land use designations provide one square foot of common open space for every 16 square feet of residential floor area, and 1 square foot of common open space for every 48 square feet of non-residential floor area in contrast to the Original Proposed Project, which would have required all projects in the Hybrid Industrial land use designations to provide 15 percent of the lot area as open space, and that for the open space to be publically accessible for projects on a lot size greater than or equal to 15,000 square feet. There is no requirement for publically accessible open space for projects in the Hybrid Industrial land use designation; however, total open space reduction of 25 percent is available if the open space is accessible to the public. The 814.8 acres of parks available within two miles of the Project Area are more than adequate to serve the projected 31,855 residents (6.39 acres per 1,000 people) and impacts as a result of the revisions to the open space requirement will not result in a new significant impact that was not disclosed in the Original DEIR.

In conclusion, the modifications contained in the Revised Proposed Alternative will not result in new significant public services impacts as previously evaluated in the Original DEIR.

Utilities

Water

A significant impact would result if the Revised Proposed Alternative led to a new significant impact to water supply that was not previously disclosed in the Original DEIR. A new significant water supply impact may occur if the land use assumptions in the Revised Proposed Alternative differed substantially from the Original Proposed Alternative, and that difference exceeded the City's water supply capacity.

Long-term water supply planning for the City of Los Angeles is conducted by Los Angeles Department of Water and Power (LADWP) through the Urban Water Management Plan (UWMP). As a function of the UWMP, LADWP forecast future water supply needs based on accounting for the average water demand of each of its customer classes, and projecting demographic changes based on the SCAG RTP data, along with weather, billing data, and conservation. As stated in the Water Supply Assessment (WSA) for the Original Proposed Alternative, LADWP accommodates growing demand by increasing the use of recycled water, conserving stormwater run-off, and expanding water conservation programs. As shown in the program assumptions described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR, the Original Proposed Alternative will result in an increase in population growth in the Project Area, however the anticipated population growth accommodated by the Proposed Alternative is six percent of the total population growth anticipated for the City of Los Angeles for 2035 as

established by SCAG in the 2012 RTP/SCS⁵, and targeted in a location in the City that could absorb more growth in compliance with SB 375. The Water Supply Assessment (WSA) for the Original Proposed Alternative concluded that the water demand generated by the Original Proposed Alternative falls within the available and projected water supplies for normal, single-dry, and multiple-dry years through 2030, and within the water demand growth projected in the Los Angeles Department of Water and Power (LADWP)'s Year 2005 Urban Water Management Plan.

The Revised Proposed Alternative expanded some of the allowable uses in the Project Area as from what was proposed in the Original Proposed Alternative. However, some of these changes would amount to the permitting of new uses in locations that would be permitted for similar type of uses under the Original Proposed Alternative. The modifications in the Revised Proposed Alternative include a change from a Greenway Zone to Urban Innovation Zone for Block 52. The water supply impacts due to the designation of Block 52 under the Urban Innovation Zone were already compared relative to the Original Proposed Alternative in Section 17.6.3 and Table 17-3 of the Original DEIR, see Modified Project Alternative discussion above. The Original DEIR concluded that the Modified Project Alternative would result in a minor increase in utilities impacts due to additional land use intensity, but would not result in a new significant impact. In addition, Block 52 is located in the River Buffer Area and would still be limited to the same 1.5:1 FAR as applied in the Greenway Zone indicating that increases in land use intensity as the result of this change would be associated with the use rather than the intensity of use. However, the Greenway Zone would also permit relatively high water supply generating uses such as restaurants. The industrial and ancillary office uses that would be permitted in the Urban Innovation Zone would have similar water supply generation characteristics as some of the uses allowed in the Greenway Zone. Furthermore, application of water conservation strategies included as Mitigation Measure Utilities 1 would apply to most uses allowed in the Urban Innovation Zone, which further reduce potential impacts of the change in designation. This change will not result in a new significant water supply impact as previously evaluated in the Original DEIR.

The Density Bonus Option, in coordination with the reduction in Base FAR in the Urban Village Zone for certain residential projects and the reduction in the marginal Bonus FAR allotted for Community Benefit Option are devised to prioritize and increase the incentive for developers to provide affordable housing in the Project Area. While this may increase the production of affordable housing relative to market rate housing, the Density Bonus Option included in the Revised Proposed Alternative would not substantially change the land use assumptions in the Original DEIR in regards to overall residential units permitted (see discussion on the City density bonus program in Section B) or introduce residential uses in areas that were not already

⁵ SCAG Population Forecast for the City of Los Angeles Sub-region, SCAG RTP-SCS, Growth Forecast Appendix, April 2012

identified under the Original Proposed Alternative.

While the Density Bonus Option is included as a new feature in the Revised Proposed Alternative, the City density bonus program, as permitted under Section 12.22 A.25 of the Los Angeles Municipal Code (LAMC) was already assumed to apply under the Original Proposed Alternative, and accounted for in the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR.

As discussed above, the Revised Proposed Alternative would not substantially change the land use assumptions referred to in Section 3.3.1 of the Original DEIR or the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR as they relate to water demand. Therefore, the Revised Proposed Alternative will not result in a new significant water supply impact as previously evaluated in the Original DEIR.

Wastewater

A significant impact would result if the Revised Proposed Alternative led to a new significant wastewater impact that was not previously disclosed in the Original DEIR. A new significant wastewater impact would occur if the land use assumptions in the Revised Proposed Alternative differed substantially from the Original Proposed Alternative, and that difference exceeded the capacity of the wastewater conveyance and treatment system.

Wastewater generation rates for land use are highly correlated with water generation rates. Substantial increases in water use would therefore lead to substantial increases in wastewater generation. As discussed above under the water supply discussion, the Revised Proposed Alternative would not substantially change the land use assumptions referred to in Section 3.3.1 of the Original DEIR or the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR as they relate to wastewater service demand. In addition, the Bureau of Sanitation has indicated that local wastewater conveyance facilities for the Project Area are currently below capacity (See Comment Letter RP-5). Future development projects would be required to evaluate sewer capacity as part of building permit process and would be required to resolve any capacity limitations prior to issuance of a building permit. Therefore, the Revised Proposed Alternative will not result in a new significant wastewater impact as previously evaluated in the Original DEIR.

Solid Waste

A significant impact would result if the Revised Proposed Alternative led to a significant new solid waste impact that was not previously disclosed in the Original DEIR. A new significant solid waste impact would occur if the land use assumptions in the Revised Proposed Alternative

differed substantially from the Original Proposed Alternative, and that difference exceeded the landfill capacity available to the City.

The general site development assumptions for the Revised Proposed Alternative are substantially the same as for the Original Proposed Alternative and as such would entail the same demolition activities as was evaluated in the Original DEIR.

The Revised Proposed Alternative expanded some of the allowable uses in the Project Area from what was proposed in the Original Proposed Alternative. However, some of these changes would amount to the permitting of new uses in locations that would be permitted for similar types of uses under the Original Proposed Alternative. The modifications in the Revised Proposed Alternative include a change from a Greenway Zone to Urban Innovation Zone for Block 52. The solid waste impacts due to the designation of Block 52 under the Urban Innovation Zone were already compared relative to the Original Proposed Alternative in Section 17.6.3 and Table 17-3 of the Original DEIR, see Modified Project Alternative discussion above. The Original DEIR concluded that the Modified Project Alternative would result in a minor increase in utilities impacts due to additional land use intensity, but would not result in a new significant impact. In addition, Block 52 is located in the River Buffer Area and would still be limited to the same 1.5:1 FAR as applied in the Greenway Zone indicating that increases in land use intensity as the result of this change would be associated with the use rather than the intensity of use. However, the Greenway Zone would also permit relatively high solid waste generating uses such as restaurants. The industrial and ancillary office uses that would be permitted in the Urban Innovation Zone would have similar solid waste generation characteristics as some of the uses allowed in the Greenway Zone. Furthermore, application of diversion strategies, such as recycling efforts would apply to most or all uses allowed in the Urban Innovation Zone, which further reduce potential impacts of the change in designation. This change will not result in a new significant solid waste impact as previously evaluated in the Original DEIR.

The Density Bonus Option, in coordination with the reduction in Base FAR in the Urban Village Zone for certain residential projects and the reduction in the marginal Bonus FAR allotted for Community Benefit Option are devised to prioritize and increase the incentive for developers to provide affordable housing in the Project Area. While this may increase the production of affordable housing relative to market rate housing, the Density Bonus Option included in the Revised Proposed Alternative would not substantially change the land use assumptions in the Original DEIR in regards to overall residential units permitted (see discussion on the City density bonus program in Section B) or introduce residential uses in areas that were not already identified under the Original Proposed Alternative.

While the Density Bonus Option is included as a new feature in the Revised Proposed Alternative, the City density bonus program, as permitted under Section 12.22 A.25 of the Los

Angeles Municipal Code (LAMC) was already assumed to apply under the Original Proposed Alternative, and accounted for in the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR.

In Section 15.3.2.2 of the Original DEIR found that the total daily solid waste generated by the Original Proposed Alternative would not significantly impact or exceed the City's landfill capacity. As discussed above, the Revised Proposed Alternative would not substantially change the land use assumptions referred to in Section 3.3.1 of the Original DEIR or the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original DEIR as they relate to solid waste demand. Therefore, the Revised Proposed Alternative will not result in a new significant solid waste impact as previously evaluated in the Original DEIR.

Electricity and Natural Gas

In regards to impacts of the Revised Proposed Project related to energy use, this is addressed in the Energy and Greenhouse Gases section below.

Energy and Greenhouse Gases

A significant impact would result if the Revised Proposed Alternative led to a significant new cumulative GHG impact that was not previously disclosed in the Original DEIR. A new significant cumulative GHG impact would occur if the land use assumptions in the Revised Proposed Alternative differed substantially from the Original Proposed Alternative, and that difference triggered a new significant cumulative impact from GHG emissions. The following analysis evaluates the land use assumptions of the Revised Proposed Alternative as compared to Original Proposed Alternative to determine if the land use changes proposed in the Revised Proposed Alternative would result in a new significant cumulative impact from GHG emissions as evaluated in the Original DEIR and RP-DEIR.

Since approximately 60 percent of the Original Proposed Project's annual greenhouse gas (GHG) emissions are attributed to mobile source emissions, substantial increase in cumulative GHG emissions would partially correspond to a substantial increase in vehicle trips as a result of the changes contained in the Revised Proposed Alternative. As shown above in the transportation analysis, the revisions due to the Density Bonus Option under the FAR Bonus Program, the targeted reductions in Base and Maximum permitted FAR, and the permitting of new uses in select locations would not result in increases in vehicle trip generation, and therefore would not contribute to a new significant cumulative impact from GHG emissions. Mitigation Measure Greenhouse Gas 1 and Greenhouse Gas 2 would continue to apply under the Revised Project Alternative.

The cumulative GHG impacts due to the designation of Block 52 under the Urban Innovation Zone were already compared relative to the Original Proposed Alternative in Section 17.6.3 and Table 17-3 of the Original DEIR, see Modified Project Alternative discussion above. The Original DEIR concluded that the Modified Project Alternative would result in a minor increase in greenhouse gas impacts due to additional land use intensity, but would not result in a new significant impact. In addition, as the discussion of transportation impacts above demonstrates, modest increases in vehicle trips may result due to the designation of Block 52 under the Urban Innovation Zone, though the industrial and ancillary office uses would support higher transit uses than the restaurant and recreational uses permitted under the Greenway Zone, and would be subject to TDM mitigation measures. Therefore, the modest increase in vehicle trips would not result in a substantial increase in GHG emissions as was previously evaluated in the Original DEIR and the RP-DEIR.

The second highest source of the Original Proposed Project's annual greenhouse gas (GHG) emissions is attributed to building energy generation, at 26.4 percent of total emissions. As stated in the RP-DEIR, the Original Proposed Project was shown to need to exceed a 16 percent break from the Unmitigated Growth scenario (2035) also known as "Business as Usual" (BAU) in order to demonstrate a less than significant cumulative increase in GHG emissions. The Original Proposed Project would be expected to produce 38 percent less total GHG emissions and 46 percent less energy-related GHG emissions as compared to the BAU.

In review of the energy detail in the CalEEMod in the FEIR Appendix A3, the land uses permitted in the Urban Innovation Zone such as general light industry, commercial office and multifamily residential uses would contribute 73 percent, 56 percent and 70 percent of the energy related emissions respectively as compared to the BAU as a result of both the renewable generation requirements built into the Revised Proposed Alternative programmatic requirements and the energy efficiency improvements as part of the Green LA Climate Action Plan. Therefore, revisions to the land use changes to Block 52 would not result in substantial increases in energy uses that would contribute to a new significant cumulative GHG impacts as compared to the Original Proposed Project.

The revisions due to the Density Bonus Option under the FAR Bonus Program, the targeted reductions in Base and Maximum permitted FAR, and the permitting of new uses in select locations would not result in substantial increases in energy use. The new uses permitted on the land use categories for specific block locations are similar in their energy demand characteristics as uses already permitted under the Original Proposed Alternative. While the Density Bonus Option is included as a new feature in the Revised Proposed Alternative, the City density bonus program, as permitted under Section 12.22 A.25 of the Los Angeles Municipal Code (LAMC) was already assumed to apply under the Original Proposed Alternative, and accounted for in the program assumptions as described in Section 2.2.1.1 and shown in Table 2-2 of the Original

DEIR. The Revised Proposed Alternative will continue to include a requirement to supply 20 percent of non-residential and 10 percent of residential energy demand with renewable energy generation,

Therefore, as increases in GHG emission sources of the Revised Proposed Alternative would be minimal in comparison to the Original Proposed Alternative, changes will not result in a new significant cumulative GHG impacts from what was disclosed in either the Original DEIR or RP-DEIR.

Significant Irreversible Environmental Changes

The modifications in the Revised Proposed Alternative include a change from a Greenway Zone to Urban Innovation Zone for Block 52 as previously described as the Modified Project Alternative in the Original DEIR; permitting of new uses in locations that would be permitted for similar types of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. The on-menu incentives of the Density Bonus Option include allowing up to 100 percent residential use in the Urban Village Zone, a 15-foot maximum height increase and the ability to exclude public common areas and unenclosed areas of a building from the total floor area calculation. The Revised Proposed Alternative would not affect the FEIR's analysis of the significant irreversible environmental changes of the project.

Growth Inducing Impacts

The modifications in the Revised Proposed Alternative include a change from a Greenway Zone to Urban Innovation Zone for Block 52 as previously described as the Modified Project Alternative in the Original DEIR; permitting of new uses in locations that would be permitted for similar types of uses under the Original Proposed Alternative; the reduction in Max FAR allowed in certain locations referenced above; the reduction in marginal Bonus FAR allotted for Community Benefit Option; and the reduction in Base FAR in the Urban Village Zone for certain residential projects to provide greater incentive to include affordable housing. The on-menu incentives of the Density Bonus Option include allowing up to 100 percent residential use in the Urban Village Zone, a 15-foot maximum height increase and the ability to exclude public common areas and unenclosed areas of a building from the total floor area calculation. The Revised Proposed Alternative would not affect the FEIR's analysis of the growth inducing impacts of the project.

Cumulative Impacts

The changes included in the Revised Proposed Alternative do not introduce a new impact or substantially increase the severity of a previously identified impact that was evaluated in either the Original DEIR or the RP-DEIR. The changes in the Revised Proposed Alternative do not affect the related project analysis of the FEIR and they do not substantially increase the project's incremental contribution towards cumulative impacts identified in the FEIR. Accordingly, it is concluded that significant new cumulative environmental impacts would not result from the changes proposed in the Revised Proposed Alternative, and new mitigation measures are not necessary with respect to cumulative impacts as a result of changes proposed in the Revised Proposed Alternative.

Alternatives

The Original DEIR analyzed three on-site alternatives: Modified Project Alternative; Reduced Project Standards Alternative; and No Redevelopment Plan Alternative. For further description of these alternatives, see Chapter 17 of the Original DEIR. The following discussion compares the Revised Proposed Alternative to each of these alternatives. Table 5-6 provides a comparison of the impacts of the Revised Proposed Alternative, to the Modified Project Alternative, and Reduced Project Standards Alternative and the No Redevelopment Plan Alternative.

Table 5-6: Potentially Significant Impacts of the Other Alternative Considered as Compared to the Revised Proposed Alternative

Impact Category	Revised Proposed Alternative	Modified Project Alternative	Reduced Project Standards Alternative	No Redevelopment Plan Alternative
Land Use	Less than Significant	Same	Potentially the same depending on the level of development	Potentially reduced
Transportation	Significant and Unavoidable	Same	Potentially reduced	Potentially reduced
Visual Resources	Less than Significant	Same	Potentially reduced	Minor increase due to increased TFAR
Earth Resources	Less than Significant with Mitigation	Same	Same	Same
Hydrology and Water Quality	Less than Significant with Mitigation	Same	Potentially reduced	Potentially reduced
Biological Resources	Less than Significant with Mitigation	Same	Same	Same

Cultural Resources	Less than Significant with Mitigation	Same	Same	Same
Hazardous Materials	Less than Significant with Mitigation	Same	Same	Same
Air Quality	Significant and Unavoidable	Same	Potentially reduced	Potentially reduced
Noise and Vibration	Significant and Unavoidable	Same	Potentially the same depending on the level of development	Potentially reduced
Population, Housing, and Employment	Less than Significant	Same	Potentially reduced	Potentially reduced
Public Services and Recreation Facilities	Less than Significant	Same	Potentially reduced	Potentially reduced
Utilities	Less than Significant with Mitigation	Same	Potentially reduced	Potentially reduced
Energy and Greenhouse Gases	Less than Significant	Same	Potentially reduced	Potentially reduced

Source: Los Angeles Department of City Planning

The description of these alternatives is provided in more detail in Section 17.6.2 of the Original DEIR. The Modified Project Alternative is the same as the Original Proposed Alternative with the exception that Block 52 is proposed to be in the Urban Innovation Zone, just as in the Revised Proposed Alternative. The No Redevelopment Alternative is substantially the same as the Original Proposed Project without the CRA Redevelopment Plan designation.

In summary, this analysis demonstrates that the modifications included in the Revised Proposed Alternative do not create either (1) a new significant environmental impact resulting from the change in the project or from a new mitigation measure proposed to be implemented; or (2) a substantial increase in the severity of an environmental impact resulting from the change in the project unless mitigation measures are adopted that reduce the impact to a level of insignificance. Therefore, recirculation of the EIR is not required.

