

Errata to the EIR

1 Introduction

Project Title: 2110 Bay Street Mixed-Use Project

Document Type: Errata to the EIR for a new mixed-use residential and commercial in-fill development (the Project).

Environmental No.: ENV-2016-3480-EIR

State Clearinghouse: 2017031007

Project Location: 2100, 2130 Bay Street and 2141 Sacramento Street, Los Angeles, CA 90021 (Project Site or Site)

Lead Agency: City of Los Angeles

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The City of Los Angeles (City) prepared an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) for the 2110 Bay Street Mixed-Use Project (Project) to assess potential environmental impacts of the Project, as described below.

The EIR is comprised of two parts, the Draft EIR and the Final EIR. A Draft EIR was made available and circulated for public review and comment, pursuant to the provisions of CEQA, for a 46-day public review period from November 8, 2018 to December 26, 2018.¹ The Final EIR was released on April 2, 2019, and included responses to comments and text revisions to the Draft EIR based on input received.²

The EIR concluded that with mitigation, all of the Project's environmental impacts would be less than significant, with the exception of a significant and unavoidable environmental impact related to traffic (intersection impact at Soto Street and Whittier Boulevard).

On May 6, 2019 the Southwest Regional Council of Carpenters filed an appeal against the Project's Vesting Tentative Tract Map. The appeal primarily focused on land use issues, including improper spot zoning, inconsistent findings with relevant policies regarding preservation of

¹ https://planning.lacity.org/eir/2110_Bay_Street/deir/DEIR%202110%20Bay%20Street%20Mixed%20Use%20Project.html

² https://planning.lacity.org/eir/2110_Bay_Street/FEIR/FEIR%202110%20Bay%20Street%20Project.html

industrial-zoned land, and issues regarding cumulative displacement of industrial developments from the Project and Related Projects.

The City has prepared this Errata to provide clarifications to the various issues raised in the Appeal, which will be considered by the decision makers prior to taking action on the Project.

2 Regulatory Information

This Errata makes minor technical corrections and clarifications to the EIR for the Project. These modifications clarify and refine the EIR and provide supplemental information to the City decision-makers and the public. CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states:

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

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

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

The information added pursuant to this Errata does not disclose a new significant environmental impact that would result from the Project or from a new mitigation measure or substantial increase in the severity of an environmental impact. Nor does it contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect environmental effect of the Project or a feasible way to mitigate or avoid such an effect that the

Applicant has declined to adopt. Additionally, information provided in this Errata does not present a feasible Project alternative or mitigation measure considerably different from others previously analyzed in the EIR. All of the information added pursuant to this Errata merely clarifies, corrects, adds to, or makes insignificant modifications to information in the EIR. The City has reviewed the information in this Errata and has determined that it does not change any of the basic findings or conclusions of the EIR, does not constitute “significant new information” pursuant to CEQA Guidelines Section 15088.5, and does not require recirculation of the Draft EIR.

3 Supplemental Land Use Consistency Analysis

Section IV.G, Land Use and Planning, of the Draft EIR, evaluates the Project’s potential land use impacts based upon the physical compatibility of the Project with its surrounding area and vicinity, and the Project’s consistency with applicable local and regional plans, regulations and policies adopted for the purpose of avoiding or mitigating an environmental effect. The following discussion expands on the land use consistency discussion from the Draft EIR and provides additional clarification to the text of the Draft EIR (additions are noted with underline and deletions are noted with ~~striketrough~~).

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

3.1 Methodology

The following clarification is provided regarding the methodology used, consistent with the Appendix G threshold language, in the first sentence of the first paragraph on page IV.G-14:

The determination of consistency with applicable land use policies is based upon a review of the previously identified planning and zoning documents that regulate land use or guide land use decisions pertaining to the Project Site, and are adopted for the purpose of avoiding or mitigating an environmental effect.

3.2 Expanded Discussion of Economic Development Chapter

The following clarification is provided regarding the Economic Development Chapter of the General Plan Framework, on page IV.G-6:

The Project’s consistency with applicable goals, objectives, and policies in the Framework Element adopted for the purpose of avoiding or mitigating an environmental effect is analyzed in Table IV.G-3 of the Draft EIR. In addition, the Project’s consistency with certain economic development goals, objectives, and policies is discussed below for informational purposes. As these economic development goals, objectives, and policies were not

adopted for the purpose of avoiding or mitigating an environmental effect, any potential inconsistency therewith would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).)

On page IV.G-23, the preamble before Table IV.G-3 has been revised as follows:

Table IV.G-3 lists the goals, objectives, and policies for land use that apply to developers in collaboration with local government. As shown, the Project would be consistent with the applicable policies of the Framework Element for each land use policy (within a developer's control or developer focused), adopted for the purpose of avoiding or mitigating an environmental effect. **Table IV.G-3** also presents the consistency analysis for each of the Framework Element chapters. In addition, the Project's consistency with certain economic development goals, objectives, or policies is discussed in the table for informational purposes. Because these economic development goals, objectives, and policies were not adopted for the purpose of avoiding or mitigating an environmental effect, any potential inconsistency therewith would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).) As shown therein, the Project would be consistent with the applicable policies, and, therefore, a less-than-significant impact would occur.

Starting on page IV.G-23, Table IV.G-3 provides a Project consistency discussion for the Economic Development Chapter's Objective 7.2 and Policy 7.2.2. The discussion has been updated to include Goal 7B, Policy 7.2.8 through Policy 7.2.11 and 7.2.14.

Goal 7B: <u>A City with land appropriately and sufficiently designated to sustain a robust commercial and industrial base.</u>	No Conflict. <u>This is an economic development goal that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would include 110 live/work apartment units, 113,350 square feet of creative office space, and 50,848 square feet of commercial space. The Project's creative office space would be designed to accommodate and would support the media and entertainment industry. The Project would result in an increase of 662 jobs onsite and would generate ongoing revenues to the City in the form of sales and property taxes. In addition, the Project Site represents only approximately 0.19 percent of the industrially zoned land in the Central City North Community Plan area. Therefore, adequate land would remain for a robust industrial base and the Project contributes to a robust commercial base.</u>
Policy 7.2.8. <u>Retain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors.</u>	No Conflict. <u>This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project Site represents only approximately 0.19 percent of the industrially zoned land in the Central City North Community Plan area. Therefore, adequate land would remain for an</u>

	<p>emerging industrial sector. In addition, the Project's creative office space could be designed to accommodate the emerging media and entertainment industry in the area, as evidenced by Warner Music's recent relocation to 7th Street and Santa Fe.</p> <p>Further, the Site is currently vacant with an 0.05:1 FAR, and the Project would result in an increase of 662 jobs onsite, including creative office and small businesses generated by the live-work units and would generate substantial ongoing revenues to the City in the form of sales and property taxes. This meets the intent of this policy.</p> <p>Moreover, this policy must be considered in light of Policy 3.14.6. As discussed above, for this specific site, as a smaller parcel with substandard streets in the immediate area, the Project Site is not suited to a new ground-up large-scale industrial operation. Furthermore, the Project would meet the criteria for changing the current industrial land use designation.</p>
<u>Policy 7.2.9.</u> Limit the redesignation of existing industrial land to other land uses except in cases where such redesignation serves to mitigate existing land use conflicts, and where it meets the criteria spelled out in Policy 3.14.6 of Chapter 3: Land Use.	<u>No Conflict.</u> This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. As discussed above, the Project would meet the criteria spelled out in Policy 3.14.6 for changing the Project Site's current industrial land use designation.
<u>Policy 7.2.10.</u> Ensure that the City's industrial sites are regionally competitive to maintain and enhance a core manufacturing base.	<u>No Conflict.</u> This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project Site is not appropriate for manufacturing due to the small size of the site and adjacent non-heavy manufacturing uses and the Project would not impede the City's ability to meet this policy. The inclusion of creative office and small businesses generated by live-work units would ensure that the City's industrial sites are regionally competitive.
<u>Policy 7.2.11.</u> Ensure that the City has sufficient quantities of land suitable to accommodate existing, new and relocating industrial firms, whose operations are appropriate to a specific location in Los Angeles.	<u>No Conflict.</u> This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would not impede the City's ability to accommodate existing, new and relocating industrial firms to a more appropriate location. The Project Site represents only approximately 0.19 percent of the industrially zoned land in the Central City North Community Plan area. Therefore, adequate land would remain for the industrial sector.

Policy 7.2.14. Take steps to assure that new industries developed are sensitive to environmental and conservation issues, and that cumulative environmental impacts are addressed.	No Conflict. The Project is not proposing new industries but rather live/work, commercial, and creative office uses that would be compatible with the immediate surrounding uses. Environmental issues have been addressed pursuant to CEQA, including the incorporation of mitigation measures where feasible.
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3.3 Expanded Discussion of General Plan

Starting on page IV.G-23, Table IV.G-3 provides a Project consistency discussion in response to the General Plan Framework Element's Policy 3.14.1, Policy 3.14.6, and Policy 3.14.9. The discussion has been updated to include Policy 3.14.2 through 3.14.8:

Policy 3.14.2: Provide flexible zoning to facilitate the clustering of industries and supporting uses, thereby establishing viable "themed" sectors (e.g., movie/television/media production, set design, reproductions, etc.).	No Conflict. This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would not impede the City's efforts to rezone or reclassify land to create clusters of industries.
Policy 3.14.3: Promote the re-use of industrial corridors for small scale incubator industries.	No Conflict. This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would not impede the City's efforts to re-use industrial corridors for small-scale incubator industries. The project's live-work units will provide the opportunity for small business, many of which may be incubator industries. The creative office component of the project will provide such opportunity as well.
Policy 3.14.4: Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.	No Conflict. This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The surrounding urban environment is comprised of a mix of industrial buildings, warehouses, residential lofts, commercial/retail, office, restaurant, parking, and neighborhood amenities. As shown in Section 3.3 above, the Project Site is located adjacent to a recently renovated building that includes restaurant and bar, event space, hotel rooms (Soho House), and a creative office building (Hyperloop One). Nearby are commercial and restaurant uses. Development of the Project would be compatible with the adjacent developments and would not result in a fragmented pattern of development.

<p>Policy 3.14.5: Promote the development of a mix of commercial and light industrial uses in areas designated as Industrial-Transit.</p>	<p>No Conflict. This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The area is not designated as Industrial-Transit.</p>
<p>Policy 3.14.6: Consider the potential re-designation of marginal industrial lands for alternative uses by amending the community plans based on the following criteria:</p> <ul style="list-style-type: none"> a. Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified site that will support viable industrial development; b. Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development; c. Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods; d. Where available infrastructure is inadequate and improvements are economically infeasible to support the needs of industrial uses; e. Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas; f. Where the conversion of industrial lands to an alternative use will not result in an adverse impact on adjacent residential neighborhoods, commercial districts, or other land uses; g. Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts; and/or h. Where existing industrial uses constitute a hazard to adjacent residential or natural areas. 	<p>No Conflict. This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only.</p> <p>The Project is proposing re-designation of industrial lands. However, development of the Project would not result in a fragmented pattern of development because it would not physically divide an established community. Specifically, the surrounding urban environment is comprised of a mix of industrial buildings, cold storage warehouses, residential lofts, commercial/retail, office, restaurant, parking, and neighborhood amenities. The Project Site is located adjacent to a recently renovated building that includes restaurant and bar, event space, hotel rooms (Soho House), and a creative office building (Hyperloop One). Nearby are commercial and restaurant uses. Development of the Project would be compatible with the adjacent mixed-use developments and would not result in a fragmented pattern of development.</p> <p>According to the Central City North Community Plan, there are 914 acres (approximately 45.5 percent of the 2,010-acre total) of industrially zoned property in the Community Plan area. The Project Site comprises 1.78, or only approximately 0.19 percent of the industrially zoned land and approximately 0.09 percent of the total land in the Community Plan area.</p> <p>The Project Site is currently developed with an existing surface parking lot, an open-air industrial shed to be incorporated into the new development (Shed Building), and an approximately 4,000 square feet manufacturing building to be demolished. The existing buildings are vacant. Thus, the Site is currently developed at a lower intensity than permitted by the existing zoning and the Project Site's many months of vacancy. Through a requested General Plan Amendment, the total FAR permitted by the proposed change to HD 2 is 6.0:1 (444,138 square feet). The Project is proposing less FAR than allowed to be entitled and is requesting a 3.91 FAR (287,137 square feet).</p>

	<p>The Project would result in an increase of 662 jobs onsite and would generate substantial ongoing revenue to the City in the form of sales and property taxes. Therefore, the Project would not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or cause the City to incur adverse fiscal impacts. Therefore, the Project would not conflict with this policy.</p>
<p>Policy 3.14.7: Consider the potential redesignation of non-industrial properties located adjacent to lands designated and developed with industrial uses for industrial purposes by amending the community plans or by conditional use permits based on the following criteria:</p> <p>a. The redesignation is required to accommodate the expansion of existing industrial uses to facilitate their retention in areas in which they are located;</p> <p>b. There is substantial support of the property owners of the parcels to be redesignated;</p> <p>c. There is no significant disruption or intrusion into existing residential neighborhoods, commercial districts, or other land uses;</p> <p>d. There are no adverse environmental impacts (traffic, noise, lighting, air pollution, other) on adjacent land uses due to the industrial uses; and</p> <p>e. There is adequate infrastructure to support the expanded industrial use(s).</p>	<p>No Conflict. This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would not impede the City's efforts to amend the community plan or by conditional use permits to re-designate non-industrial properties adjacent to lands designated and developed with industrial uses.</p> <p>The Project is proposing re-designation of industrial lands. However, development of the Project would not result in a fragmented pattern of development because it would not physically divide an established community. Specifically, the surrounding urban environment is comprised of a mix of industrial buildings, warehouses, residential lofts, commercial/retail, office, restaurant, parking, and neighborhood amenities. The Project Site is located adjacent to a recently renovated building that includes restaurant and bar, event space, hotel rooms (Soho House), and a creative office building (Hyperloop One). Nearby are commercial and restaurant uses. Development of the Project would be compatible with the adjacent mixed-use developments and would not result in a fragmented pattern of development.</p>
<p>Policy 3.14.8: Encourage the development in areas designated as "Industrial-Heavy" of critical public facilities that are necessary to support the needs of residents and businesses but normally are incompatible with residential neighborhoods and commercial districts, such as corporate yards.</p>	<p>No Conflict. This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would not impede the City's efforts to provide critical public facilities to support the needs of residents and businesses. As noted, the area is a mix of industrial, commercial, and live/work uses. New residential services and amenities such as restaurants and neighborhood-serving retail have been added to the Arts District area to the north.</p>

3.4 Expanded Discussion of Community Plan

After the preamble introducing the land use consistency table for the Central City North Community Plan, the following additional paragraph is added after the last paragraph on page IV.G-40:

In addition, the Project's consistency with certain economic development goals, objectives, or policies is discussed in the table for informational purposes. Because these economic development goals, objectives, and policies were not adopted for the purpose of avoiding or mitigating an environmental effect, any potential inconsistency therewith would not be considered to be a significant environmental impact. (CEQA Guidelines Section 15064(e).)

Starting on page IV.G-41, Table IV.G-6 provides a Project consistency discussion for the Community Plan's Industrial Objective 3-2 and Policy 3-2.1. The discussion has been updated to include Goal 3, Objective 3-1, Policy 3-1.1 through Policy 3-1.3, Objective 3-3, and Policy 3.3.1 and revised discussion for Policy 3-2.1:

<p>Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities which are safe for the environment and the work force and which have minimal adverse impact on adjacent uses.</p> <p>Objective 3-1: To provide for existing and future industrial uses which contribute job opportunities for residents and which minimize environmental and visual impacts to the community.</p> <p>Policy 3-1.1: Designate lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing, and similar uses which provide employment opportunities.</p> <p>Policy 3-1.2: Adequate compatibility should be achieved through design treatments, compliance with environmental protection standards and health and safety requirements for industrial uses where they adjoin residential neighborhoods and commercial uses.</p>	<p>No Conflict. Each of these relates to economic development, and none were specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project Site represents only approximately 0.19 percent of the industrially zoned land in the Central City North Community Plan area. Therefore, adequate land would remain for emerging industrial sectors.</p> <p>The Project is proposing a re-designation of industrial lands. However, development of the Project would not result in a fragmented pattern of development because it would not physically divide an established community. Specifically, the surrounding urban environment is comprised of a mix of industrial buildings, warehouses, residential lofts, commercial/retail, office, restaurant, parking, and neighborhood amenities. The Project Site is located adjacent to a recently renovated building that includes restaurant and bar, event space, hotel rooms (Soho House), and a creative office building (Hyperloop One). Nearby are commercial and restaurant uses. Development of the Project would be compatible with the adjacent mixed-use developments and would not result in a fragmented pattern of development.</p> <p>The Project Site is currently developed with an existing surface parking lot, an open-air industrial shed to be incorporated into the new development (Shed Building).</p>
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<p>Policy 3-1.3: Require that any proposed development be designed to enhance and be compatible with adjacent development.</p>	<p>and an approximately 4,000 square feet manufacturing building to be demolished. The existing buildings are vacant. Thus, the Site is currently developed at an existing FAR (0.05:1) compared to the Project's proposed FAR of 3.9:1 (287,137 square feet). Through a requested General Plan Amendment, the total FAR permitted by the proposed change to HD 2 is 6.0:1 (444,138 square feet). The Project is proposing less FAR than allowed to be entitled. The redevelopment of the vacant site would result in an increase of 662 jobs onsite and would generate substantial ongoing revenues to the City in the form of sales and property taxes.</p> <p>The Project is not an industrial use adjacent to residential and commercial uses. Rather, the Project is a residential, creative office, and restaurant use. In addition, the Project would be in compliant with the required health and safety requirements applicable to residential, office, and restaurant uses.</p> <p>Therefore, this meets the intent of each of the goal, objective, and policy.</p>
<p>Policy 3-2.1: Support the existing artists-in-residence in Central City North as a cultural resource for the community.</p>	<p>No Conflict. This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project would support the existing artist-in-residence community by providing opportunities for artists to live in close proximity to work and potentially within the same space. A live/work unit allows the artist to live and work in the same unit.</p> <p>Consistent: The Project includes development of live-work units, office, and commercial uses.</p>
<p>Objective 3-3 To retain industrial plan designations to maintain the industrial employment base for community residents and to increase it whenever possible.</p>	<p>No Conflict. This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project Site represents only approximately 0.19 percent of the industrially zoned land in the Central City North Community Plan area. Therefore, land would remain for maintain the industrial employment base.</p>
<p>Policy 3-3.1 The numerous large rail yards and other industrially planned parcels located in predominantly industrial areas should be protected from development by other uses which do not support the industrial base of the City and the community.</p>	<p>No Conflict. This is an economic development policy that was not specifically adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the following is for informational purposes only. The Project Site represents only approximately 0.19 percent of the industrially zoned land in the Central City North Community</p>

	<p><u>Plan area. Therefore, land would remain for emerging industrial sectors.</u></p> <p><u>The two nearest rail yards are approximately 3,400 feet south of the Site near Washington Boulevard, and 4,500 feet north of the Site near 4th Street. Neither is nearby the Project Site.</u></p> <p><u>In addition, the Site is currently vacant, and the Project would result in an increase of 662 jobs onsite and would generate substantial ongoing revenues to the City in the form of sales and property taxes. Moreover, the creative office space could be designed to accommodate the media and entertainment industries. This would not conflict with the intent of this policy.</u></p>
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3.5 Expanded Discussion of City’s Industrial Land Use Policy

Page IV.G-52 through IV.G-56 discusses the City’s Industrial Land Use Policy (ILUP). In order to clarify the role of the ILUP, the following language is inserted as a preamble to the section:

In 2007, the City Planning Department and Community Redevelopment Agency formulated an Industrial Land Use Policy (ILUP) that was intended to preserve certain industrially zoned land in the City for industrial use. The ILUP addressed three general areas of the City: Hollywood, West Los Angeles, and “Greater Downtown,” which includes the Project Site. In 2008, the City Planning Commission approved the ILUP, but it was never formally presented to the City Council for consideration or adoption. Since the ILUP was never formally adopted by the City Council, the City considers zone changes and General Plan Amendments from industrial designations on a case-by-case basis, as it has historically done.

In addition, since 2008 a number of other planning and policy studies have been undertaken involving industrial land policy. For example, since 2014, the City began undertaking DTLA 2040, which involves an update of the Central City and Central City North Community Plans and the planning process involved studying the current trend of land use. The plan proposes to modify the land use designations and zoning for Downtown Los Angeles. A draft of the DTLA 2040 plan is currently available to the public. The Project Site is proposed to be designated “Hybrid Industrial (HI)” under the DTLA 2040 Plan. According to the Draft Plan, Hybrid Industrial areas preserve productive activity and prioritize space for employment, including light industrial, new industry, commercial, and vertically integrated businesses, with careful introduction of live-work uses.

Before the start of the last paragraph on page IV.G-53, the following should be added:

The Project Site is also located within Analysis Area 5 (a subsection of Analysis Area 3). The ILUP Map for Analysis Area 5 shows that the Project Site land use at the time was “Commercial/Service/Office”, and thus the Site was clearly not an industrial use at the time of the survey, similar to current conditions on the Site today. The surrounding area and the ILUP map reflected a Project Site that had already converted from industrial uses. Therefore, the conversion of the vacant site does not hinder the preservation of industrial land uses, which occurs elsewhere.

In addition, the following language is added at the end of the section on page IV.G-56 to supplement discussion of industrial land use policy:

Furthermore, although the ILUP identified the Project Site as within an area where industrial zoning should be maintained, as indicated in other City policies, such as the *Economic Development* Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses, provided this could be substantiated through subsequent analysis and study. Similarly, the ILUP itself stated that if unique circumstances existed to approve a change of use or zone in the Project Site area, the findings for such determination would need to be clearly articulated and the project should be required to incorporate community benefits.

3.6 General Statements on Industrial Displacement

The following new subsection has been added on page IV.G-60, after the second paragraph:

(o) Industrial Displacement

According to the Central City North Community Plan, there are 914 acres (approximately 45.5 percent of the 2,010-acre total) of industrially zoned property in the Community Plan area. The Project Site comprises 1.78 acres, or only approximately 0.19 percent of the industrially zoned land and approximately 0.09 percent of the total land in the Community Plan area. The conversion of industrial land is an economic issue that is not within the scope of CEQA review unless it results in adverse impacts on the physical environment. While the Project will remove the existing surface parking lot and manufacturing building (the open-air industrial shed will be incorporated into the new development) on the Project Site, these uses are vacant (and have been since at least 2014) and do not support an industrial business. Thus, there would be no need to relocate to other sites in the area.

The Project is consistent with the land use patterns, trends and uses in the immediate area, which is developed with a variety of commercial, residential, and live-work projects on properties zoned for industrial uses. Therefore, the Project will not have any material effect on future conversions of industrial land to office, residential, or commercial uses in the Arts District. Additionally, it is unlikely that the Project Site could in fact attract any viable industrial use. Therefore, the Project would not conflict with this policy. Further, the

Project site is located within the boundary of the Artists-in-Residence (AIR) District as identified in the Community Plan. Therefore, the Project would not displace any industrial uses, and impacts would be less than significant.

Within the section regarding cumulative impacts, the following clarifying text has been added on page IV.G-63, after the third paragraph:

In regard to industrial displacement, as noted, the Project Site comprises approximately 0.19 percent of the industrially-zoned land in the Community Plan area. Moreover, the conversion of industrial land is an economic issue that is not within the scope of CEQA review unless it results in adverse impacts on the physical environment. The Project Site is vacant and would not displace existing industrial uses. The Project is consistent with the land use patterns, trends and uses in the immediate area, which is developed with a variety of commercial, residential, and live-work projects on properties zoned for industrial uses. The Project Site is not well-suited to modern large-scale industrial operations, and the site is no longer being fully utilized for industrial related purposes.

While some of the related projects may displace existing warehouse or industrial uses, it is unclear whether the displaced uses will cease business or relocate to another area. It would be speculative to assume that they will relocate to other sites in the area. In addition, if they were to relocate, it is unclear whether these businesses would move into existing buildings or seek to develop new facilities. If industrial uses were displaced, they would also only be able to locate to lots that are industrially zoned or would have to seek a zone change to industrial use. The development of new industrial facilities would also likely require discretionary approval and CEQA review. **As such, the project will not have cumulatively considerable impacts related to displacement of industrial uses and cumulative impacts from the project are therefore less than significant.**

3.7 Expanded Cumulative Impact Analysis

To supplement the cumulative analysis of land use consistency, the first paragraph on page IV-G-62 has been modified as follows:

(1) Land Use Consistency

As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Specifically, as with the Project, the related projects would be required to comply with certain regulations and City goals, objectives, and policies to reduce emissions during construction as well as using clean materials and energy efficient appliances, consistent with the City's Green Building Code. In support of the City's goal to reduce vehicle miles, it is anticipated that related projects would also implement various methods to promote alternative modes of transportation, including providing bicycle parking spaces, which is a City requirement. Therefore, the Project and the related

projects would not have cumulatively significant land use impacts. In addition, as discussed above, as the Project would not be in substantial conflict with either the General Plan or Community Plan, or the whole of relevant environmental policies in other applicable plans- The Project supports the General Plan by contributing to the available housing stock within the City and towards the critical housing needs of the City, as well as the Mayor's initiative to build 100,000 new housing units by 2020. Also, the Project supports Framework Element Policy 3.3 (promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs), as the proposed General Plan Amendment would locate housing near jobs-rich Downtown while also allowing for jobs-producing uses. As such, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans and relevant environmental policies. **Therefore, cumulative impacts with regard to land use consistency would not be cumulatively considerable and would be less than significant.**

4 Conclusion

The City has prepared the Errata and has determined that it does not change any of the findings or conclusions of the EIR and does not constitute significant new information requiring recirculation pursuant to CEQA Guidelines Section 15088.5. The clarification of land use discussion does not constitute a substantial revision such that a Supplemental/Subsequent EIR need be prepared, as set forth in CEQA Guidelines 15163. The change constitutes updated information which makes insignificant corrections and clarifications to the Final EIR and does not introduce new information that was not known previously, and recirculation is not required.³ There would be no new significant impacts or new mitigation measures required as a result of the Project.

³ State CEQA Guidelines 15163