
ERRATUM TO THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE SOUTHERN CALIFORNIA FLOWER MARKET PROJECT

INTRODUCTION

This Erratum makes minor technical corrections and clarifications to the Final Environmental Impact Report (EIR) for the Southern California Flower Market Project (Project). These EIR 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 Erratum 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 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 Erratum 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 Erratum merely clarifies, corrects, adds to, or makes insignificant modifications to information in the EIR. The City has reviewed the information in this Erratum 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 EIR.

Minor Corrections and Additions

Clarification to Project Description

Following publication of the Final EIR, a discrepancy was found pertaining to the description of the Event Space floor area identified in the Project Description of the Draft EIR, and the actual floor area shown on the Project Plans. The total physical area of Event Space proposed, including both interior and exterior areas, is depicted on Sheets A3.40 and A3.50 of the Project Plans, dated July 25, 2019, as 21,295 square feet. The breakdown of these areas is shown in Table 1 below and should be added to Draft EIR page 2-2, in the “Project Overview” Subsection.

**Table 1
Event Space Calculation Summary**

Location	Space	Size
Fourth Floor	Event Space (Interior)	5,660 square feet
	Event Space Open Terrace	9,485 square feet
Fifth Floor	Event Space Terrace	6,150 square feet
Total		21,295 square feet

It should be noted that the proposed area of Event Space has not physically changed since the publication of the Final EIR, but was incorrectly described as 10,226 square feet, which per the “Floor Area Breakdown” on the Project Plans, dated July 25, 2019, is comprised of 5,660 square feet interior and 1,040 square feet of exterior covered Event Space, and 3,566 square feet of Lobbies/Other Interior Area. Updating the Event Space area from 10,226 square feet to 21,295 square feet serves to more accurately describe the area of use rather than the area included for the purposes of calculating building floor area, as defined by the Los Angeles Department of Building and Safety (LADBS). In addition, the EIR analyzed a maximum of 125 attendees for any event held in the event space. This number of attendees was not based on the square footage of the event space, but rather, was provided by the Project Applicant as the maximum number of attendees that would be permitted for the type of small, more intimate special events that would be held within the Project. Thus, the maximum number of attendees (125) would not change based on the clarification of the event space square footage. Further, the EIR assumed a maximum of 28 employees to service the special events, and that number of employees would not change based on the clarification of the event space square footage. However, as portions of the Draft EIR (such as the Project Description and Section 4.N, Utilities and Service Systems) analyzed the Project as including 10,226 square feet of Event Space, an analysis of this revision is provided below.

Addition of Clarifying Language to Mitigation Measure E-1

In addition to the above clarification, the following additions shall be made to EIR Mitigation Measure E-1, in order to clarify the role of LADBS, Grading Division, in reviewing and approving the Geotechnical Investigation prepared by Geocon West, Inc. Additions are provided in **bold**.

E-1 The Project shall comply with the recommendations found on pages 10 through 41 of the Geotechnical Investigation, Southern California Flower Mart Proposed Mixed-Use Development, 747 & 755 South Wall Street, Los Angeles, California, prepared by Geocon West, Inc., July 2016 (included as Appendix G to the Draft EIR), **and as may be amended and supplemented** to the satisfaction of the Department of Building and Safety, **Grading Division**.

These clarifications and additions do not alter the conclusions of the EIR, as is presented in the analysis below.

ENVIRONMENTAL IMPACT ANALYSIS

1. Aesthetics

No changes are proposed to the Project design or the types of land uses included in the Project, and only minor changes are proposed with respect to the description of the event space square footage included in the Project. Therefore, the impacts with respect to aesthetics would remain unchanged from the EIR.

2. Air Quality

As stated below under Subsection 11, Transportation/Traffic, the Project's estimated trip generation for the proposed event space is based on the maximum number of event attendees (125 attendees), and is not based on the square footage of this use. As stated above, the maximum number of event attendees would remain at 125 people, and would not change based on the clarification of the event space square footage. Therefore, the clarification of the event space square footage would not result in any changes to the number of vehicle trips generated by the Project. As no additional vehicle trips would be generated, the impacts with respect to air quality would remain unchanged from what was analyzed in the EIR, and impacts would continue to be less than significant.

3. Cultural Resources

The conditions that could affect impacts to cultural resources would remain unchanged with the clarification of the event space square footage. There are no historic buildings located on the Project Site, and there are no changes to the proposed construction footprint or amount of excavation. Therefore, the potential to encounter archaeological resources, paleontological resources, or human remains would be the same as disclosed in the EIR, and the impacts with respect to cultural resources would remain unchanged.

4. Geology and Soils

The conditions that could affect impacts to geology and soils would remain unchanged from the analysis provided in the EIR. Neither the clarification of the event space square footage, nor the clarification of Mitigation Measure E-1, change the existing geologic conditions of the Project Site,

or the engineering and excavations plans for the development. Therefore, the geology and soils impacts would remain unchanged.

5. Greenhouse Gas Emissions

As stated below under Subsection 11, Transportation/Traffic, the Project's estimated trip generation for the proposed event space is based on the maximum number of event attendees (125 attendees), and is not based on the square footage of this use. As stated above, the maximum number of event attendees would remain at 125 people, and would not change based on the clarification of the event space square footage. Therefore, the description of the event space square footage would not result in any changes to the number of vehicle trips generated by the Project. As no additional vehicle trips would be generated, the impacts with respect to greenhouse gas emissions would remain unchanged from what was analyzed in the EIR, and impacts would continue to be less than significant.

6. Hazards and Hazardous Materials

The conditions that could affect impacts to hazards and hazardous materials would remain unchanged from the analysis provided in the EIR. The Project would continue to be constructed on the same site as analyzed in the EIR, and the same type of land uses are proposed. As discussed in the EIR, the Project would only involve the limited use of hazardous materials, such as small quantities of cleaning solvents, paints, and pesticides for landscaping. These substances would be used and disposed of in accordance with applicable regulations, and therefore, impacts would be less than significant. As such, impacts with respect to hazards and hazardous materials would remain unchanged from the EIR.

7. Land Use and Planning

No changes are proposed to the types of land uses included in the Project, and only minor changes are proposed with respect to the description of the event space square footage included in the Project. In addition, no new or different discretionary actions are requested based on the clarification of the event space square footage calculation. As such, the land use and planning impacts would remain unchanged from the EIR.

8. Noise

As stated below under Subsection 11, Transportation/Traffic, the Project's estimated trip generation for the proposed event space is based on the maximum number of event attendees (125 attendees), and is not based on the square footage of this use. As stated above, the maximum number of event attendees would remain at 125 people, and would not change based on the clarification of the event space square footage. Therefore, the change in the description of the event space square footage would not result in any changes to the number of vehicle trips generated by the Project. As no additional vehicle trips would be generated, no additional traffic noise would be generated as a result of the Project.

Noise attributable to special events in the enclosed and outdoor event space could include three sources:

- Kitchen- and dining-related activity. The event facility includes a small kitchen and bar area, where guests could access food and beverages. Any noise associated with dining-related activities would generally be confined to the enclosed event space. Any ventilation from any food preparation would have to comply with LAMC Section 112.02(a) which

governs noise from mechanical equipment. This noise would be inaudible at the nearest sensitive receptors with a line of sight, the closest of which the Santee Court Apartments, located 240 feet north of the Project Site. Any noise from the enclosed facility would be another 60 feet away, given the event facility's setback from the edge of the building. In addition, the only doors and windows proposed for the enclosed space are along the south elevation of this event facility, further limiting any possible transmission of noise beyond the enclosed building.

- Amplified music. The event facility could include acoustic or amplified music that would be confined to the enclosed event space. Any entertainment-related noise would have to comply with LAMC Section 112.01 which governs these types of sources. Any interior noise would be inaudible at the nearest sensitive receptors with a line of sight, the closest of which the Santee Court Apartments, located 240 feet north of the Project Site. Any noise from the enclosed facility would be another 60 feet away, given the event facility's setback from the edge of the building. In addition, the only doors and windows proposed for the enclosed space are along the south elevation of this event facility, further limiting any possible transmission of noise beyond the enclosed building.
- Human conversation. The event facility includes open terraces on the fourth and fifth floors, where socializing could occur. These outdoor spaces represent gathering places for outdoor activities that are both private and group oriented. These would be intermittent activities that would produce negligible impacts from human speech, based in large part on the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels, but only up to approximately 67 dBA at a reference distance of one meter. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB, meaning people talk slightly above ambient noise levels in order to communicate.¹ Even assuming a worst-case scenario, where up to 67 dBA of human noise is generated over an ambient noise level as low as 50.8 dBA L_{eq} at the open terrace (existing ambient noise levels at the Santee Court Apartments), human conversations from rooftop activities could generate about a 0.3 dBA L_{eq} increase at the nearest sensitive receptors at the Santee Court Apartments. Because the threshold of audibility for humans is 3 dBA, this impact would be inaudible and far below the City's thresholds of significance for operational noise impacts. Any attenuation from solid railing, roof edges, and safety barriers around these open terraces would further mitigate any noise transmission.

If activities were to occur during the evening from 7:00 P.M. to 10:00 P.M., any CNEL adjustment of 5 dBA to account for human sensitivities would result in a 1.0 dBA L_{eq} increase in ambient noise levels at the nearest receptor. If any outdoor activities were to occur after 10:00 P.M., a CNEL adjustment of 10 dBA would to 10:00 P.M., any CNEL adjustment of 5 dBA to account for human sensitivities would result in a 2.5 dBA L_{eq} increase in ambient noise levels at the nearest receptor, an impact that is inaudible and below the City's thresholds of significance.

Therefore, the impacts with respect to noise would remain unchanged from what was analyzed in the EIR, and impacts would continue to be less than significant.

¹ *Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.*

9. Population and Housing

The clarification of the event space square footage would not result in any changes to the population generated by the Project, or the number of housing units included in the Project. In addition, as stated above, the maximum number of event attendees would remain at 125 people, and would not change based on the clarification of the event space square footage. Therefore, the number of employees needed to serve the event space would also remain unchanged from what was analyzed in the EIR. As no changes are proposed with respect to any other uses contained in the Project, the number of employees for the other uses would also remain unchanged from the analysis contained in the EIR. Therefore, the impacts with respect to population and housing would be less than significant, and no new impacts would occur as a result of the clarification of the event space square footage.

10. Public Services

Fire

As discussed above under Subsection 9, Population and Housing, neither the population nor the number of employees generated by the Project would change based on the clarification of the event space square footage. As such, there would be no additional need for fire protection beyond what was analyzed in the EIR. Therefore, the impacts with respect to fire protection would remain unchanged from the analysis contained in the EIR.

Police

As discussed above under Subsection 9, Population and Housing, neither the population nor the number of employees generated by the Project would change based on the clarification of the event space square footage. As such, there would be no additional need for police protection beyond what was analyzed in the EIR. Therefore, the impacts with respect to police protection would remain unchanged from the analysis contained in the EIR.

Schools

As discussed above under Subsection 9, Population and Housing, neither the population nor the number of employees generated by the Project would change based on the clarification of the event space square footage. As such, there would be no additional students generated by the Project beyond what was analyzed in the EIR. Therefore, the impacts with respect to schools would remain unchanged from the analysis contained in the EIR.

Parks

As discussed above under Subsection 9, Population and Housing, neither the population nor the number of employees generated by the Project would change based on the clarification of the event space square footage. As such, there would be no additional demand for parks and recreational facilities beyond what was analyzed in the EIR. Therefore, the impacts with respect to parks would remain unchanged from the analysis contained in the EIR.

Libraries

As discussed above under Subsection 9, Population and Housing, neither the population nor the number of employees generated by the Project would change based on the clarification of the

event space square footage. As such, there would be no additional demand for library facilities beyond what was analyzed in the EIR. Therefore, the impacts with respect to libraries would remain unchanged from the analysis contained in the EIR.

11. Transportation/Traffic

The analysis of Project traffic impacts contained in the EIR and in the approved traffic study (contained in Draft EIR Appendix K-1) is not based on the event space square footage. Instead, the Project's estimated trip generation for the proposed event space is based on the maximum number of event attendees, or in this case, 125 attendees. As stated above, the maximum number of event attendees would remain at 125 people and the maximum number of employees servicing the special events would remain at 28 people; neither figure would change based on the clarification of the event space square footage. Therefore, the clarification of the event space square footage would not result in any changes to the traffic impacts previously disclosed in the EIR, as confirmed by the Los Angeles Department of Transportation (LADOT) in an email dated July 26, 2019. Therefore, impacts with respect to traffic would be less than significant, and no new impacts would occur as a result of the clarification of the event space square footage.

12. Tribal Cultural Resources

The conditions that could affect impacts to tribal cultural resources would remain unchanged with the clarification of the event space floor area. There are no changes to the proposed construction footprint or amount of excavation. Therefore, the potential to encounter tribal cultural resources would be the same as disclosed in the EIR, and the impacts with respect to tribal cultural resources would remain unchanged.

13. Utilities and Service Systems

Wastewater

As shown in Table 2, below, with the clarification of the event space square footage, the Project would result in an increase of 82,808 gallons of wastewater per day, as compared to existing conditions. This is a nominal increase of 3,321 gallons per day compared to the analysis provided in the EIR. The Hyperion Treatment Plant would have capacity to treat the additional wastewater generated by the Project. Further, as stated in the EIR, detailed gauging and evaluation as part of the City's permit process would identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Applicant would be required to build sewer lines to a point in the sewer system with sufficient capacity. Therefore, the impacts with respect to wastewater would be less than significant, and no new impacts would occur as a result of the clarification of the event space square footage.

Table 2
Estimated Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Proposed			
Residential – 2-Bedroom ^a	323 units	190 gallons / unit	61,370
Office	64,363 sf	120 gallons / 1,000 sf	7,724
Retail	4,385 sf	25 gallons / 1,000 sf	110

**Table 2
Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Restaurant	13,420 sf	300 gallons/ 1,000 sf	4,026
Wholesale retail/storage/cooler	63,785 sf	50 gallons / 1,000 sf	3,189
Event Space	21,295 sf	300 gallons/ 1,000 sf	6,389
Total			82,808
<i>Note: sf = square feet; gpd = gallons per day</i> <i>^a All 323 residential units are designed as open live/work units with no separate bedrooms. Therefore, in order to present a conservative estimate of impacts, the 2-bedroom rate has been used for all units.</i> <i>Source: Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, June 23, 2017.</i> <i>City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors.</i>			

Water

As shown in Table 3, below, with the clarification of the event space square footage, the Project would result in an increased demand of 87,413 gallons of water per day, as compared to existing conditions. This is a nominal increase of 4,250 gallons per day compared to the analysis provided in the EIR. As stated in the EIR, LADWP would be able to supply the water needed for the Project (including the increased amount based on the revised event space square footage), and impacts would therefore be less than significant and no new impacts would occur as a result of the clarification of the event space square footage.

**Table 3
Estimated Water Demand**

Land Use	Size	Water Demand Rates	Total (gpd)
Proposed			
Residential – 2-Bedroom ^a	323 units	192 gallons / unit	62,016
Office	64,363 sf	153.6 gallons / 1,000 sf	9,886
Retail	4,385 sf	32 gallons / 1,000 sf	140
Restaurant	13,420 sf	384 gallons / 1,000 sf	5,153
Wholesale retail/storage/cooler	63,785 sf	32 gallons / 1,000 sf	2,041
Event Space	21,295 sf	384 gallons / 1,000 sf	8,177
Total			87,413
<i>Note: sf = square feet; gpd = gallons per day</i> <i>Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.</i> <i>Source: Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, June 23, 2017.</i> <i>City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors.</i> <i>^a All 323 residential units are designed as open live/work units with no separate bedrooms. Therefore, in order to present a conservative estimate of impacts, the 2-bedroom rate has been used for all units.</i>			

Solid Waste

As shown in Table 4, below, with the clarification of the event space square footage, the Project would result in an increase of 4,850 pounds of solid waste per day, as compared to existing conditions. This is a nominal increase of 55 pounds per day compared to the analysis provided in the EIR. As stated in the EIR, the Sunshine Canyon Landfill would have adequate capacity to accommodate the Project's solid waste (including the increased amount based on the revised event space square footage), and impacts would therefore be less than significant and no new impacts would occur as a result of the clarification of the event space square footage.

Table 4
Estimated Solid Waste Generation

Land Use	Size	Solid Waste Generation Rates	Total (pounds)
Proposed			
Residential	323 units	12.23 lbs/day/du	3,950
Office	64,363 sf	6 lbs/day/1,000 sf	386
Retail	4,385 sf	5 lbs/day/1,000 sf	22
Restaurant	13,420 sf	5 lbs/day/1,000 sf	67
Wholesale retail/storage/cooler	63,785 sf	5 lbs/day/1,000 sf	319
Event Space	21,295 sf	5 lbs/day/1,000 sf	106
Total			4,850
<i>Note: sf = square feet</i> <i>Rates: http://www.calrecycle.ca.gov/wastechar/wastegenrates/</i>			

Energy Conservation

As shown in Table 5, below, with the clarification of the event space square footage, the Project would result in an increased demand of 4,083,570 kilowatt hours per year of electricity, as compared to existing conditions. As stated in the EIR, the Project's electricity consumption (including based on the revised square footage calculation) would represent approximately 0.02 percent of the forecasted 2022-2023 electricity demand. Impacts would therefore be less than significant and no new impacts would occur with respect to electricity as a result of the clarification of the event space square footage.

As shown in Table 6, below, with the clarification of the event space square footage, the Project would result in an increased demand of 1,780,734 cubic feet of natural gas per month, as compared to existing conditions. As stated in the EIR, the Project's natural gas consumption (including based on the revised square footage calculation) would represent approximately 0.002 percent of the peak 2022 natural gas demand. Impacts would therefore be less than significant and no new impacts would occur with respect to natural gas as a result of the clarification of event space square footage.

**Table 5
Estimated Electricity Demand**

Land Use	Size	Electricity Rates	Total (kw-h/yr)
Residential	323 du	5,626.50 kw-h/du/yr	1,817,360
Commercial	167,248 sf	13.55 kw-h/sf/yr	2,266,210
Total			4,083,570
<i>du = dwelling unit sf =square feet kw-h = kilowatt-hour yr = year</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate</i> <i>LADWP does not provide or comment on generation rates to provide an estimate of demand.</i>			

**Table 6
Estimated Natural Gas Demand**

Land Use	Size	Natural Gas Demand Rates	Total (cf/mo)
Proposed			
Residential	323 du	4,011.5 cf / du	1,295,715
Commercial	167,248 sf	2.9 cf / sf	485,019
Total			1,780,734
<i>sf =square feet; cf = cubic feet; mo = month</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate</i> <i>The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i>			

CONCLUSION

Based on the analysis presented above, the edits and additions to the EIR set forth in this Erratum do not result in any of the conditions set forth in Section 15088.5 of the CEQA Guidelines requiring recirculation of the Draft EIR. Specifically, the Project would not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR, nor does this Erratum disclose a feasible alternative or mitigation measure the Applicant has declined to adopt. The analysis provided above demonstrates that all of the impacts previously examined in the EIR would remain unchanged with the clarification of the event space square footage, and clarification of Mitigation Measure E-1.