

ATTACHMENT F(A)

Project Consistency with SCAG 2016-2040 RTP/SCS PEIR Mitigation Measures

As a new mixed-use residential and commercial project to be developed at an urban infill site that directly fronts a SCAG-identified high quality transit corridor and within a SCAG-identified High Quality Transit Area (as well as Transit Priority Area), the most relevant prior EIR for the Project is the SCAG 2016 RTP/SCS Program EIR ("PEIR"), which was adopted in April 2016. The PEIR's MMRP includes various mitigation measures, both at the regional level that would be implemented by SCAG and at the project level that would be implemented by the lead agency. Regional mitigation measures would be implemented by SCAG and are therefore not discussed in this table. This table focuses on the Project's consistency with the MMRP's project-level mitigation measures. All mitigation measures referenced herein that would be incorporated into the Project would be enforceable through the Project entitlements as conditions of approval. The complete list of the mitigation measures identified in the PEIR is included in Exhibit A, Mitigation Monitoring and Reporting Program (MMRP), of the Final PEIR. This table focuses on the Project's consistency with the MMRP's project-level mitigation measures (marked as PMM in the MMRP). All mitigation measures referenced herein that would be incorporated into the Project would be enforceable through the Project entitlements as Project Measures (PMs).

Impact	Project – Level Mitigation Measures (Implemented by Lead Agency)	Project Consistency
Aesthetics (AES)		
AES-1: Potential to have a substantial adverse effect on a scenic vista.	MM-AES-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:	No mitigation applies. This mitigation measure does not apply to the Project as Public Resources Code (PRC) Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment" for purposes of CEQA. "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned. Section 21064.3 of the PRC defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. As described in this exemption

	<ul style="list-style-type: none"> • Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. • Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. • Use alternating facades to “break up” large facades and provide visual interest. • Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. • Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. • Retain or replace trees bordering highways, so that clear-cutting is not evident. • Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. • Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions in design of projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain. 	<p>document under the criterion identified by PRC § 21155(b)(3), and as confirmed by the City of Los Angeles, the Project Site is located within one-half mile of a major transit stop, and is therefore located within a transit priority area.¹</p> <p>The Project is a mixed-use residential project located on an infill development site within a transit priority area, and therefore meets these criteria. Accordingly, the Project’s potential aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099.</p> <p>Notwithstanding, the Project will include the following Project measures (PMs), which would be consistent with the measures identified by MM-AES-1(b):</p> <p>PM-AES-1: Prior to the issuance of a grading permit, the Applicant shall submit a Landscape Plan, prepared by a state-licensed landscape architect, demonstrating all street trees in the public right-of-way meet the requirements of the current Street Tree Division Standards.</p> <p>PM-AES-2: All open areas not used for buildings, driveways, parking areas, recreational facilities, or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect.</p>
AES-2: Potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	No mitigation required.	No mitigation applies. As described above, PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment,” and as described above under AES-1 , the Project meets these

¹ City of Los Angeles Zoning Information Map Access System (“ZIMAS”) Parcel Profile Reports for 4100 Sunset Boulevard and 1071-1089 Manzanita Street (Assessor Parcel Numbers 5429-002-002, -003, -004, and 018), accessed May 29, 2020; City of Los Angeles Zoning Information (“ZI”) File No. 2452. The intersection of Sanborn Avenue/Santa Monica Boulevard/Sunset Boulevard, located approximately 0.05 mile from the Project Site, qualifies as a major transit stop because multiple bus routes with 15 minute headways or less during peak hours (Metro Local 2/302, Metro Local 4, and Metro Rapid 704) intersect at this location.

		statutory criteria. Moreover, the Project Site is not located along a state scenic highway. ²
AES-3: Potential to substantially degrade the existing visual character or quality of the site and its surroundings.	<p><u>MM-AES-3(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. • Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. • Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. • Design projects consistent with design guidelines of applicable general plans. • Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable. • Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and 	<p>No mitigation applies. As described above, PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment,” and as described above under AES-1, the Project meets these statutory criteria.</p> <p>Notwithstanding, the Project will include the following measures, which would be consistent with the measures identified by MM-AES-3(b):</p> <p>PM-AES-1 and PM-AES-2: See above.</p> <p>PM-AES-3: Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104. The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a public street or alley, pursuant to LAMC Section 91.8104.15.</p>

2 California Department of Transportation (Caltrans), California State Scenic Highway System Map. 2020. Available at: <https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983>. Accessed December 12, 2020.

	billboards in good condition, and replace compromised native vegetation and landscape.	
<p>AES-4: Potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Potential to result in shade and shadow impacts.</p>	<p><u>MM-AES-4(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or minimizing the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. • Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations. • Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting • Use unidirectional lighting to avoid light trespass onto adjacent properties. • Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. • Provide structural and/or vegetative screening from light-sensitive uses. • Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. • Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. • Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties 	<p>No mitigation applies. As described above, PRC Section 21099, enacted by Senate Bill 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment,” and as described above under AES-1, the Project meets these statutory criteria.</p> <p>Notwithstanding, the Project will include the following Project measures, which would be consistent with the measures identified by MM-AES-4(b):</p> <p>PM-AES-4: Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.</p> <p>PM-AES-5: The exterior of the proposed structures shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.</p>
Agricultural and Forestry Resources (AF)		

<p>AF-1: Potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.</p>	<p>MM-AF-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses that are within the jurisdiction and responsibility of the Natural Resources Conservation Service, the California Resources Agency, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Farmland Protection Act and implementing regulations, and the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the Farmland Mapping and Monitoring Program of the California Resources Agency. Such measures may include the following, or other comparable measures identified by the Lead Agency taking into account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> • For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act). • Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. • Maintain and expand agricultural land protections such as urban growth boundaries. <p>Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks. Local governments would be responsible for encouraging the development of agriculture conservation easements or farmland mitigation banks, purchasing conservation agreements or farmland for mitigation, and ensuring that the terms of the conservation easement agreements are upheld. The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see https://www.wildlife.ca.gov/Conservation/Planning/Banking)</p> <p>“A conservation or mitigation bank is privately or publicly owned land managed for its natural resource values. In exchange for permanently</p>	<p>No mitigation applies. This mitigation measure does not apply to the Project as no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance exists on or in the vicinity of the Project Site,³ nor does any farming or agricultural activity exist on or in the vicinity of the Project Site.</p>
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³ California Department of Conservation, Farmland Mapping & Monitoring Program, California Important Farmland: 1984-2018, available at <https://maps.conservation.ca.gov/dlrp/ciftimeseries/>, accessed October 29, 2020.

	<p>protecting, managing, and monitoring the land, the bank sponsor is allowed to sell or transfer habitat credits to permittees who need to satisfy legal requirements and compensate for the environmental impacts of developmental projects.</p> <p>A privately owned conservation or mitigation bank is a free-market enterprise that:</p> <ul style="list-style-type: none">• Offers landowners economic incentives to protect natural resources;• Saves permittees time and money by providing them with the certainty of pre-approved compensation lands;• Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values;• Provides for long-term protection and management of habitat. <p>A publicly owned conservation or mitigation bank:</p> <ul style="list-style-type: none">• Offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance.” <p>In 2013, the University of California published an article entitled “Reforms could boost conservation banking by landowners” that speaks specifically to the use of agricultural lands for in conjunction with conservation banking programs.</p> <ul style="list-style-type: none">• Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands.• Include underpasses and overpasses at reasonable intervals to maintain property access.• Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.• Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible.	
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	<ul style="list-style-type: none"> Contact the California Department of Conservation and each county's Agricultural Commissioner's office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts. 	
AF-2: Potential to conflict with existing zoning for agricultural use, or a Williamson Act contract.	<p><u>MM-AF-2(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from conflict with existing zoning for agricultural use or a Williamson Act contract that are within the jurisdiction and responsibility of the California Department of Conservation, other public agencies, and Lead Agencies. Where the Lead Agency has identified that a project has potential for significant effects, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of agriculture and forestry resources to ensure compliance with the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the California Land Conservation Act of 1965, the Farmland Security Zone Act, and county and city zoning codes, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> Project relocation or corridor realignment to avoid lands in Williamson Act contracts. Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection. Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable. 	<p>No mitigation applies. This mitigation measure does not apply to the Project, because the Project Site is not zoned for agricultural production, there is no farmland at the Project Site,⁴ and there are no Williamson Act contracts in effect for the Project Site.⁵</p>

⁴ Ibid.

⁵ California Department of Conservation, 2016 State of California Williamson Act Contract Land, [https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/\(E\)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf](https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf), accessed May 27, 2020.

AF-3: Potential to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).	No mitigation required.	No mitigation applies.
AF-4: Potential to result in the loss of forest land or conversion of forest land to non-forest use.	<u>MM-AF-1(b)</u> and <u>MM-GHG-3(b)</u> . See above and below.	No mitigation applies. The Project Site does not include forest land; therefore, no forest land will be lost or converted to non-forest uses. See discussion under AF-1(b) and GHG-3(b) for discussion of the Project's consistency with those mitigation measures.
AF-5: Potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	<u>MM-AF-1(b)</u> and <u>MM-GHG-3(b)</u> . See above and below.	No mitigation applies. The Project Site is currently not used for any agricultural uses and is not forest land; therefore, no agricultural use or forest land will be converted to non-forest uses. See discussion under AF-1(b) and GHG-3(b) for discussion of the Project's consistency with those mitigation measures.
Air Quality	Project – Level Mitigation Measures	Project Consistency/Notes
AIR-1: Potential to conflict with or obstruct implementation of the applicable air quality plan.	No mitigation required.	No mitigation applies.
AIR-2: Potential to violate any air quality standard or contribute substantially	<u>MM-AIR-2(b)</u> : Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a	The Project already substantially conforms to this mitigation measure, as it will comply with existing regulations that have been identified and are required by the Southern California Air Quality Management District (SCAQMD) and the California Air

<p>to an existing or projected air quality violation.</p>	<p>project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible.</p> <p>CARB, South Coast AQMD, Antelope Valley AQMD, Imperial County APCD, Mojave Desert AQMD, Ventura County APCD, and Caltrans have identified project-level feasible measures to reduce construction emissions:</p> <ul style="list-style-type: none"> • Minimize land disturbance. • Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. • Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. • Cover trucks when hauling dirt. • Stabilize the surface of dirt piles if not removed immediately. • Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. • Minimize unnecessary vehicular and machinery activities. • Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. • On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. • Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. • Ensure that all construction equipment is properly tuned and maintained. • Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. 	<p>Resources Board (CARB) to facilitate consistency with plans for attainment for the NAAQS and CAAQS, as applicable and feasible. Implementation of the following specific Project measures will further ensure consistency with MM-AIR-2(b):</p> <p>PM-AQ-1: Consistent with SCAQMD Rule 403, the following measures shall be incorporated into Project plans and specifications:</p> <ul style="list-style-type: none"> • Water or a stabilizing agent shall be applied to exposed surfaces at least three times per day to prevent generation of dust plumes. • The construction contractor shall utilize at least one of the following measures at each vehicle egress to a paved public road: <ul style="list-style-type: none"> ○ Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; ○ Pave the surface extending at least 100 feet and at least 20 feet wide; ○ Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or ○ Install a wheel washing system to remove bulk material from tires and vehicle undercarriages. • All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions). • Construction activity on unpaved surfaces shall be suspended when wind speed exceeds 25 miles per hour (such as instantaneous gusts). • Ground cover in disturbed areas shall be replaced as quickly as possible. • Non-toxic soil stabilizers shall be applied according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
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	<ul style="list-style-type: none"> • Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators. • Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. • As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. • Implement EPA's National Clean Diesel Program. • Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible. • On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity. • If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines. • Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines. • Convert part of the construction truck fleet to natural gas. • Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts. • Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road). • Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas. • Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner offroad heavy-duty diesel engines and comply with State off-road regulation. 	<ul style="list-style-type: none"> • Traffic speeds on all unpaved roads shall be reduced to 15 mph or less. • Streets shall be swept at the end of the day if visible soil is carried onto adjacent public paved roads. If feasible, use water sweepers with reclaimed water. • Heavy-duty equipment operations shall be suspended during first and second stage smog alerts. <p>PM-AQ-2: Consistent with SCAQMD Rule 1113, the following measures shall be incorporated into Project plans and specifications:</p> <ul style="list-style-type: none"> • The contractor shall use architectural coatings that average 50 g/L VOC content or less. • The development shall utilize low VOC cleaning supplies. <p>PM-AQ-3: Consistent with SCAQMD Rule 445, the following measures shall be incorporated into Project plans and specifications:</p> <ul style="list-style-type: none"> • The residential units shall either exclude hearths or include natural gas hearths. <p>PM-AQ-4: Consistent with Section 2485 of Title 13 of the California Code of Regulations, the following measures shall be incorporated into Project plans and specifications:</p> <ul style="list-style-type: none"> • Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site. <p>PM-AQ-5: Consistent with SCAQMD Rule 401 and CARB's In-use Off-road Diesel-Fueled Fleets Regulation, the following measures shall be incorporated into Project plans and specifications:</p> <ul style="list-style-type: none"> • Equipment and vehicle engines shall be maintained in good condition and in proper tune per manufacturers' specifications. All diesel-powered construction equipment shall use CARB Level 2 or higher diesel particulate filters. • Electricity shall be utilized from power supply sources rather than temporary gasoline or diesel power generators, as feasible.
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	<ul style="list-style-type: none"> • Use on-road, heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation. • Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary • Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3 minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit. • Prohibit diesel idling within 1,000 feet of sensitive receptors. • Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors. • The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • The engine size of construction equipment shall be the minimum practical size. • Catalytic converters shall be installed on gasoline-powered equipment. • Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit. • Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite. • Use new or rebuilt equipment. • Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be check by an ASE-certified mechanic and determined to be running in proper condition before it is operated. • Use low rolling resistance tires on long haul class 8 tractor-trailers. • Suspend all construction activities that generate air pollutant emissions during air alerts. • Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines. 	<p>PM-AQ-6: All diesel-powered off-road construction equipment greater than 50 horsepower shall meet USEPA Tier 4 or higher emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a CARB-defined Level 3 diesel emissions control strategy for a similarly sized engine.</p> <p>Implementation of these measures and compliance with existing regulations would facilitate consistency with plans for attainment of air quality standards identified by SCAQMD, CARB, and the federal government, and would be equal to or more effective than MM-AIR-2(b). Therefore, the Project would be consistent with this mitigation measure.</p>
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<p>AIR-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable NAAQS or CAAQS.</p>	<p>No mitigation required.</p>	<p>No mitigation applies.</p>
<p>AIR-4: Expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially.</p>	<p><u>MM-AIR-4(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS transportation projects would be located. Where the Lead Agency has identified that a project has the potential to expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s), or other comparable measures, to reduce cancer risk pursuant to the Air Toxics “Hot Spots” Act of 1987 (AB2588), as applicable and feasible. Such measures include those adopted by CARB designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment. CARB’s strategy includes the following elements:</p> <ul style="list-style-type: none"> • Set technology forcing new engine standards. • Reduce emissions from the in-use fleet. • Require clean fuels, and reduce petroleum dependency. • Work with US EPA to reduce emissions from federal and state sources. • Pursue long-term advanced technology measures. <p>Proposed new transportation – related SIP measures include:</p> <p>On – Road Sources</p> <ul style="list-style-type: none"> • Improvements and Enhancements to California’s Smog Check Program • Expanded Passenger Vehicle Retirement • Modifications to Reformulated Gasoline Program • Cleaner In-Use Heavy-Duty Trucks • Ship Auxiliary Engine Cold Ironing and Other Clean Technology • Cleaner Ship Main Engines and Fuel • Port Truck Modernization 	<p>No mitigation applies. This mitigation measure does not apply to the Project, because the Project does not involve a 2016-2040 RTP/SCS transportation project. As a privately developed mixed-use project, the Project cannot establish new regulatory standards or requirements, such as setting new engine standards or making improvements and enhancements to California’s Smog Check Program.</p> <p>Notwithstanding, the Project would not conflict with this mitigation measure, as it would implement Project measures in conformance with existing regulatory requirements as described above under AIR-1 to reduce the Project’s construction-related emissions. In addition, the Project would include multi-family residential units and a limited amount of neighborhood-serving commercial uses, which would not generate significant operational emissions, as an industrial or warehousing use could be expected to. Therefore, through compliance with existing regulatory requirements as well as implementation of the identified measures described above, the Project would not conflict with this mitigation measure, to the extent applicable.</p>

	<ul style="list-style-type: none"> Accelerated Introduction of Cleaner Line-Haul Locomotives Clean Up Existing Commercial Harbor Craft Limited idling of diesel-powered trucks Consolidated truck trips and improve traffic flow Late model engines, Low emission diesel products, engine retrofit technology Alternative fuels for on-road vehicles <p>Off – Road Sources</p> <ul style="list-style-type: none"> Cleaner Construction and Other Equipment Cleaner In-Use Off-Road Equipment Agricultural Equipment Fleet Modernization New Emission Standards for Recreational Boats Off-Road Recreational Vehicle Expanded Emission Standards 	
AIR-5: Expose a substantial number of people to objectionable odors.	No mitigation required.	No mitigation applies.
Biological Resources	Project – Level Mitigation Measures	Project Consistency/Notes
BIO-1: Potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	<u>MM-BIO-1(b):</u> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on threatened and endangered species and other special status species that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Sections 7, 9, and 10(a) of the federal Endangered Species Act; the California Endangered Species Act; the Native Plant Protection Act; the State Fish and Game Code; and the Desert Native Plant Act; and related applicable implementing regulations, as applicable and feasible. Additional compliance should adhere to applicable implementing regulations from the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and/or the California	The Project would be in substantial conformance with this mitigation measure, as it would be developed on an existing commercially zoned parcel that is currently fully developed with an approximately 9,800 square foot two-story building that has been in existence since 1926 as well as surrounding surface parking areas. The Project would not be developed on open space, and development of the Project would not result in adverse effects to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife ^{6,7} or U.S. Fish and Wildlife Service, ⁸ or the California Native Plant Society. It would also not result in any adverse effects to any occupied habitat, potentially suitable habitat, or designated critical habitat.

⁶ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), www.wildlife.ca.gov/Data/BIOS

⁷ California Department of Fish and Wildlife, CDFW Lands, www.wildlife.ca.gov/Lands

⁸ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html

	<p>Department of Fish and Wildlife. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. • Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act to support issuance of an Incidental take permit. A wide variety of conservation strategies have been successfully used in the SCAG region to protect the survival and recovery in the wild of federally and state-listed endangered species including the bald eagle: <ul style="list-style-type: none"> - Avoidance strategies - Contribution of in-lieu fees - Use of mitigation bank credits - Funding of research and recovery efforts - Habitat restoration - Conservation easements - Permanent dedication of habitat - Other comparable measures • Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. • Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources. • Appoint an Environmental Inspector to monitor implementation of mitigation measures. • Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. • Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance. • Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols 	<p>As discussed in the Tree Report prepared for the Project by Carlberg Associates, dated June, 2020, included as Attachment J, there are 3 trees within the Project Site and 1 offsite street tree. The 3 on-site trees are proposed to be removed to accommodate the development of the Project, and the 1 street tree may require canopy pruning if equipment access will occur in proximity. Should removal of the street tree be required, it would be replaced in accordance with the City's Urban Forestry Division's Standards, subject to approval by the Board of Public Works.</p> <p>None of the trees are considered protected by the City's Tree Preservation Ordinance No. 177,044. However, the trees that are to be removed or pruned have the potential to support nesting birds that are protected under the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulations, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season to ensure that potential significant impacts to migratory birds would not occur in connection with any removal or pruning of existing on-site or street trees.</p> <p>Specifically, in conformance with the MBTA, tree removal activities would take place outside of the nesting season (February 15–September 15) to the greatest extent practicable. To the extent that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 300-foot buffer (500 feet for raptors) would be established until the fledglings have left the nest.</p> <p>Therefore, due to the lack of existing habitat or special status species at the Project Site, as well as through compliance with existing regulatory requirements, the Project would be consistent with this mitigation measure.</p>
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	or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	
BIO-2: Potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations; or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	<p><u>MM-BIO-1(b)</u>. See above.</p> <p><u>MM-BIO-2(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on state-designated sensitive habitats, including riparian habitats, that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 1600 of the State Fish and Game Code, USFS Land Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino, implementing regulations for the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other related federal, state, and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act. • Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. • Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California Endangered Species Act, or 	<p>See consistency analysis under MM-BIO-1(b) above.</p> <p>The Project would also be in substantial conformance with MM-BIO-2(b), as the Project would be replacing the Project Site's existing urban land uses consisting of a two-story commercial building and surface parking areas with a new mixed-use development. The Project would not be developed on sensitive or riparian habitat. Therefore, development of the Project would not result in adverse effects to any sensitive or riparian habitat that could support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Moreover, as described above under MM-BIO-1(b), there are no protected trees at the Project Site, and all tree removals or pruning would take place in conformance with the MBTA and State and local regulations. Therefore, the Project is consistent with these mitigation measures.</p>

	<p>Fully-Protected Species afforded protection pursuant to the State Fish and Game Code.</p> <ul style="list-style-type: none">• Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds.• Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season.• Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities.• Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the Manual of California Vegetation, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate.• Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.• Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats.• Install fencing and/or mark sensitive habitat to be avoided during construction activities.• Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of temporary disturbance within the project area.• Revegetate with appropriate native vegetation following the completion of construction activities.• Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).• Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using	
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	straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
BIO-3: Potential to have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	<p><u>MM-BIO-1(b)</u> and <u>MM-BIO-2(b)</u>. See above</p> <p><u>MM-BIO-3(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 404 of the Clean Water Act and regulations of the U.S. Army Corps of Engineers (USACOE), and other applicable federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible. • Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB). • Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This 	<p>See consistency analysis above under MM-BIO-1(b) and MM-BIO-2(b).</p> <p>No mitigation applies. These mitigation measures do not apply to the Project, because the Project Site does not include any protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies.⁹</p>

⁹ United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html.

	<p>compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:</p> <ul style="list-style-type: none"> • Permittee-responsible mitigation • Contribution of in-lieu fees • Use of mitigation bank credits • Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether wetlands will be affected and, if necessary, perform a formal wetland delineation. 	
<p>BIO-4: Potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.</p>	<p><u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, and <u>MM-BIO-3(b)</u>. See above</p> <p><u>MM-BIO-4(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations of the USFWS, USFS, CDFW, and related regulations, goals and policies of counties and cities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur. • Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for 	<p>See consistency analysis above under MM-BIO-1(b), MM-BIO-2(b), and MM-BIO-3(b).</p> <p>The Project would also be substantially in conformance with MM-BIO-4(b) for the reasons stated below. The Project Site is located in a developed, urban area and the Project would be replacing existing urban land uses consisting of a two-story commercial building and surrounding surface parking areas. The Project Site is surrounded by other existing urban uses including retail establishments, auto service establishments, restaurants, and multi-family residences, and the Project would therefore not be developed on or adjacent to any existing open space, habitat area, wildlife nursery, or wildlife corridor. Thus, development of the Project Site would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Furthermore, as described above under MM-BIO-1(b), the Project would comply with the MBTA and Section 3503 of the California Department of Fish and Wildlife Code to ensure that potential significant impacts to migratory birds would not occur in connection with the removal or pruning of trees. Therefore, through compliance with existing regulatory requirements, the Project is consistent with these mitigation measures.</p>

	<p>the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.</p> <ul style="list-style-type: none">• Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement.• Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.• Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible.• Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area from February 1 through August 31.• Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.• Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.• Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Analyze habitat linkages/wildlife movement corridors on a broader and cumulative impact analysis scale to avoid adverse impacts from linear projects that have potential for impacts on a broader scale or critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. Require review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDDB by a qualified biologist to determine the risk of habitat fragmentation.	
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	<ul style="list-style-type: none">• Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).• Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible.• Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern.• Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction• Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas.• Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in <u>MM-BIO-1(b)</u>, where applicable:<ul style="list-style-type: none">- Wildlife movement buffer zones- Corridor realignment- Appropriately spaced breaks in center barriers- Stream rerouting- Culverts- Creation of artificial movement corridors such as freeway under- or overpasses- Other comparable measures	
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	<ul style="list-style-type: none"> Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species. Establish native vegetation within habitat pockets or the “wildling of urbanized habitats” that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas. 	
<p>BIO-5: Potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.</p>	<p><u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, and <u>MM-BIO-4(b)</u>. See above.</p> <p><u>MM-BIO-5(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist. 	<p>See consistency analysis above regarding MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), and MM-BIO-4(b).</p> <p>The Project would be in substantial conformance with these mitigation measures for the reasons stated below. The Project is located in a developed, urban area and would be replacing existing land uses consisting of a two-story commercial building and surrounding surface parking areas. The Project would not be developed on existing open space or sensitive habitat. As described above under MM-BIO-1(b) and in the tree report prepared for the Project (Attachment J), the Project Site does not contain any trees subject to the regulations of the City’s protected tree ordinance. Furthermore, as discussed under MM-BIO-1(b), the Project would be required to comply with the MBTA to ensure that potential impacts to migratory birds would not occur in connection with the removal or pruning of trees. Therefore, development of the Project will not conflict with any local policies or ordinances protecting biological resources, and would be consistent with this mitigation measure.</p>

	<ul style="list-style-type: none">• If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species.• Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree.• Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.• Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.• Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration.• If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed.	
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	<ul style="list-style-type: none"> Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources. Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: <ul style="list-style-type: none"> Avoidance strategies Contribution of in-lieu fees Planting of replacement trees at a minimum ratio of 2:1 Re-landscaping areas with native vegetation post-construction Other comparable measures 	
BIO 6: Potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	<p>See <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-BIO-4(b)</u>, and <u>MM-BIO-5(b)</u>.</p> <p><u>MM-BIO-6(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on HCP and NCCPs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act; and implementing regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs. 	<p>See above for consistency analysis regarding MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-BIO-4(b), and MM-BIO-5(b).</p> <p>No mitigation applies. The Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.¹⁰ Furthermore, the Project Site is not within or adjacent to any existing Significant Ecological Area.¹¹ Therefore, this mitigation measure does not apply.</p>

¹⁰ California Department of Fish & Wildlife, California Regional Conservation Plans, www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans, and Natural Community Conservation Plans, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>.

¹¹ County of Los Angeles, Significant Ecological Areas, planning.lacounty.gov/site/sea/.

	<ul style="list-style-type: none"> • Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in <u>MM-BIO-1(b)</u>, where applicable. 	
Cultural Resources	Project – Level Mitigation Measures	Project Consistency/Notes
CUL-1: Potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features.	<p><u>MM-CUL-1(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. 	<p>The Project would be in substantial conformance with this mitigation measure. During the Project's construction phase, excavation and grading of the Project Site would occur. The Project Site is located within a highly developed urban area and given that the Project Site has already been previously disturbed and developed, the potential for discovery of paleontological resources is considered low. Nonetheless, to ensure there would be no impacts to unique paleontological resources or sites or unique geological features, the Project would implement relevant provisions of MM-CUL-1(b), as set forth below under PM-CUL-1. The City has determined that these measures are equal to or more effective than MM-CUL-1(b) regarding paleontological resources:</p> <p>PM-CUL-1: Prior to obtaining a grading permit, a qualified paleontologist shall be retained and shall prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources that could potentially be encountered during construction. The PRMP shall include provisions requiring Worker Education and Awareness Program (WEAP) training for on-site construction personnel to understand the regulatory framework that provides for protection of paleontological resources. During earthmoving activities, a qualified paleontologist shall oversee implementation of the</p>

	<ul style="list-style-type: none"> • Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources. • Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible: <ul style="list-style-type: none"> ○ All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. ○ Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP. ○ Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. ○ Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas. • Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance. • Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. 	<p>PRMP, including performing periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities in the area of the exposed material may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.</p>
<p>CUL-2: Potential to cause a substantial adverse change in the significance of a historical resource, including tribal cultural</p>	<p><u>MM-CUL-2(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local</p>	<p>The Project substantially conforms with this mitigation measure for the following reasons. GPA Consulting (GPA) was retained to identify historical resources on and in the vicinity of the Project Site to assess any potential impacts the Project may have on identified historical resources. As discussed in the Historical</p>

<p>resources, as defined in CEQA Guidelines Section 15064.5.</p>	<p>Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on historical resources, to ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified. • Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project. • Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: <ul style="list-style-type: none"> ○ Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. 	<p>Resource Technical Report prepared for the Project by GPA Consulting, dated April 2020, included in Attachment K, the existing building on the Project Site is not currently listed under national, state, or local landmark or historic district programs. Furthermore, it was not identified in any previous historic resource surveys, including Survey LA. A records search prepared by the South Central Coastal Information Center revealed no prior evaluations of any of the properties comprising the Project Site or Study Area. After careful inspection, investigation, and evaluation, GPA concluded that the existing building located at the Project Site is ineligible for listing in the National Register of Historic Places, California Register of Historical Resources, as well as ineligible for designation as a Los Angeles Historic-Cultural Monument for lack of historical significance, architectural distinction and integrity. Thus, the property is not a historical resource as defined by CEQA. As the existing building on the Project Site that would be removed does not meet the definition of a historical resource according to CEQA, the Project would have no direct impacts on historical resources. In addition, the indirect impacts from the Project were also analyzed by GPA and it was concluded that the Project would have no indirect impacts on historical resources as there are none in the Study Area. Therefore, no historical resources would be materially impaired by the Project</p> <p>For a discussion of potential impacts to archaeological resources and/or tribal cultural resources, see discussion of CUL-3 below.</p>
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	<ul style="list-style-type: none">○ Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.● Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource.● Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site.● Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified.● Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources.● If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property.● Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated.	
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	<ul style="list-style-type: none"> Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources. 	
<p>CUL-3: Potential to cause a substantial adverse change in the significance of an archaeological resource, including tribal cultural resources, pursuant to CEQA Guidelines Section 15064.5.</p>	<p>See <u>MM-CUL-2(b)</u>.</p>	<p>The Project would substantially conform with this mitigation measure. The Project is located within a highly developed urban area on a previously disturbed site and the potential for discovery of archaeological or tribal cultural resources is considered low. Nonetheless, to ensure there would be no impacts to archaeological resources or tribal cultural resources, the Project would implement the relevant provisions of MM-CUL-2(b) pertaining to archaeological resources, as set forth below under PM-CUL-2, and would also implement the City's standard condition of approval regarding inadvertent discovery of tribal cultural resources, as set forth below under PM-CUL-3. The City has determined that collectively, these conditions of approval are equal to or more effective than MM-CUL-2(b) regarding archaeological and tribal cultural resources:</p> <p>PM-CUL-2: Prior to obtaining a grading permit, a qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning and also to the South Central Coastal Information Center (SCCIC) at Cal State University Fullerton. Ground-disturbing activities in the area of the exposed material may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.</p>

		<p>PM-CUL-3: In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the Project Site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:</p> <ul style="list-style-type: none">○ Upon a discovery of a potential tribal cultural resource, the Project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed Project; (2) and the Department of City Planning.○ If the City determines, pursuant to Public Resources Code Section 21074(a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.○ The Project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the Project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.○ The Project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
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<p>CUL-4: Potential to disturb human remains, including those interred outside of formal cemeteries, including Native American Sacred Sites.</p>	<p><u>MM-CUL-4(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency should consider mitigation measures capable of avoiding or reducing significant impacts on human remains, to ensure compliance with the California Health and Safety Code, Section 7060 and Section 18950-</p>	<p>The Project substantially conforms with this mitigation measure as described below. The Project Site is located within a highly developed urban area on a previously disturbed site and the potential for discovery of human remains is considered low. Nonetheless, compliance with existing regulatory requirements as described below under PM-CUL-1, which the City has determined are equal to or more effective than MM-CUL-4(b), would ensure there would be no impacts pertaining to the unanticipated identification of human remains.</p>

	<p>18961 and Native American Heritage Commission, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. • If any discovered remains are of Native American origin: <ul style="list-style-type: none"> ○ Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. ○ If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and reburial the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur: <ul style="list-style-type: none"> ➔ The Native American Heritage Commission is unable to identify a descendant; ➔ The descendant identified fails to make a recommendation; or ➔ The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner. 	<p>PM-CUL-1: If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:</p> <ul style="list-style-type: none"> ○ Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 AM to 5 PM Monday through Friday) or 323-343-0714 (after hours, Saturday, Sunday, and holidays) <p>If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.</p> <ul style="list-style-type: none"> ○ The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. <p>If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.</p>
Energy	Project – Level Mitigation Measures	Project Consistency/Notes

EN-1: Potential to increase petroleum and nonrenewable fuel consumption in the regional transportation system.	No mitigation required.	No mitigation applies.
EN-2: Potential to increase residential energy consumption use.	<p><u>MM-EN-2(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with CALGreen, local building codes, and other applicable laws and regulations governing residential building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including: <ul style="list-style-type: none"> ○ Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ○ Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. ○ Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight. ○ Incorporate passive environmental control systems that account for the characteristics of the natural environment. ○ Use high-efficiency lighting and cooking devices. ○ Incorporate passive solar design. ○ Use high-reflectivity building materials and multiple glazing. ○ Prohibit gas-powered landscape maintenance equipment. ○ Install electric vehicle charging stations. ○ Reduce wood burning stoves or fireplaces. ○ Provide bike lanes accessibility and parking at residential developments. 	<p>The Project already substantially conforms to this mitigation measure as it would be required to comply with existing regulatory requirements including California Building Code (Title 24 of the California Code of Regulations [CCR]), which incorporates the requirements of CALGreen. In addition, the Project would comply with the measures identified under PM-USS-1 and PM-USS-2, which pertain to water conservation measures, with corresponding reductions in energy consumption.</p> <p>To demonstrate the efficacy of these regulatory requirements, an Energy & Water Report has been prepared to demonstrate the Project's specific energy and water use based upon its proposed design (Attachment E). As shown therein, the Project would be in compliance with the PRC's statutory requirements for a transportation priority project (TPP) building to be designed to be 15 percent more energy efficient than the applicable Title 24 standards and to be designed to achieve 25 percent less water usage than the average household use in the region. Specifically, the Project's energy use would be 15.6 percent less than Title 24, Part 6 (2019). The Project's water use would be 56.9 percent below the average household use in the region. Accordingly, the City has determined that compliance with existing regulatory requirements is equal to or more effective than MM-EN-2(b).</p>
EN-3: Potential to increase building energy	<u>MM-EN-2(b)</u> . See above.	As described under EN-2 , the Project already substantially conforms to this mitigation measure, because the Project would be required to comply with the City's Green Building Code as

consumption in anticipated development.		well as Title 24, which incorporates the requirements of CALGreen. Moreover, as demonstrated by the Energy & Water Report prepared for the Project (Attachment E), the Project's energy use would be 15.6 percent less than Title 24, Part 6 (2019).
EN-4: Potential to increase water consumption and energy use related to water in anticipated development.	No mitigation required.	No mitigation applies. Nevertheless, the Project would be required to comply with the City's Green Building Code as well as Title 24, which incorporates the requirements of CALGreen. Moreover, pursuant to this regulatory compliance as well as the measures identified under PM-USS-1 and PM-USS-2 , and as demonstrated by the Energy & Water Report prepared for the Project (Attachment E), the Project's water use would be 56.9 percent below the regional baseline.
Geology and Soils	Project – Level Mitigation Measures	Project Consistency/Notes
GEO-1: Potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic related ground-failure, including liquefaction; (iv) landslides.	<p>MM-GEO-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault. 	<p>The Project already substantially conforms to this mitigation measure through compliance with existing regulatory requirements, as described below.</p> <p>As shown by ZIMAS and as described in the Project's Geology Reports included as Attachment L, the Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone or a fault zone mapped by the State Geologist pursuant to the Seismic Hazard Mapping Act.¹² Additionally, the Project Site is not located within a City-designated Fault Rupture Study Area, as identified by the City's ZIMAS System. No active faults are known to pass through the immediate Project vicinity. The Project Site is also not within a City-designated Hillside Area, a landslide zone, a liquefaction zone, a fault rupture study area, or a tsunami inundation zone.¹³ Nevertheless, the Project is located in the seismically active region of Southern California and is susceptible to ground shaking during a seismic event. However, the Project would be required to comply with the existing building, grading, and seismic regulations of the City's Building Code, which incorporates the Uniform Building Code (UBC) and California Building Code (CBC). Compliance with these regulations is required by Los Angeles Municipal Code ("LAMC") Section 91.7006, which requires the Los Angeles Department of</p>

¹² City of Los Angeles, ZIMAS Parcel Profile Reports for 4100 Sunset Boulevard and 1071-1089 Manzanita Street (Assessor Parcel Numbers 5429-002-002, -003, -004, and 018), accessed May 29, 2020.

¹³ Ibid.

	<ul style="list-style-type: none"> • Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC. • Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils 	<p>Building and Safety to review and approve a final design-level geotechnical report for the Project prior to the issuance of grading permits. Furthermore, these final geotechnical reports would incorporate the building design recommendations contained in the existing Geology Reports prepared for the Project. Accordingly, the City has determined that compliance with existing regulatory requirements as well as the recommendations of the Geology Reports, as described below under PM-GEO-1, is equal to or more effective than MM-GEO-1(b).</p> <p>PM-GEO-1: Prior to the issuance of grading or building permits, the Applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Los Angeles Department of Building and Safety, for review and approval. The geotechnical report shall assess soil and geologic conditions at the site and include building design recommendations, including those recommendations contained in the Geotechnical Feasibility Study, 1085 & 1087 Manzanita Street, prepared by Terracon on January 15, 2008 as well as in the Revised Geotechnical Update Letter, 1085 & 1087 Manzanita Street and 4100 Sunset, prepared by Terracon on January 13, 2015 (Attachment L). The Project shall comply with the conditions contained in the approved geotechnical report as well as with the recommendations in the final design-level geotechnical report reviewed by LADBS pursuant to Los Angeles Building Code Sections 7006.2.</p>
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	and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.	
GEO-2: Potential to result in substantial soil erosion or the loss of topsoil.	<p><u>MM-GEO-2(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following: <ul style="list-style-type: none"> ○ File a Notice of Intent (NOI) with the SWRCB. ○ Prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. ○ Submit to the RWQCB a copy of the SWPPP and evidence of submittal of the NOI to the SWRCB. Implementation of the 	<p>The Project already substantially conforms to this mitigation measure, because the Project would be required to comply with existing regulatory requirements pertaining to erosion and stormwater control, as well as the design and construction recommendations contained in the Geology Reports prepared for the Project (Attachment L). Specifically, as required by PM-GEO-1, a final design-level geotechnical report shall be reviewed and approved by LADBS that incorporates the recommendations of these existing reports and demonstrates compliance with the City's existing geology and soils requirements, including but not limited to LAMC Section 91.7013 pertaining to erosion control and drainage devices, Section 91.7014 regarding flood and mudflow protection, and Section 91.7016 regarding regulations for areas that are subject to slides and unstable soils. Therefore, the Project would be consistent with this mitigation measure.</p>

	<p>SWPPP should start with the commencement of construction and continue through the completion of the project.</p> <ul style="list-style-type: none"> ○ After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB. ● Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. ● Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils. 	
<p>GEO-3: Potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.</p>	<p><u>MM-GEO-1(b)</u>. See above.</p>	<p>As described in GEO-1, the Project already substantially conforms to this mitigation measure. As described in the Geology Reports prepared for the Project (Attachment L), the Project Site is not located within a currently established Alquist-Priolo Earthquake Fault Zone or a fault zone mapped by the State Geologist pursuant to the Seismic Hazard Mapping Act. No active faults are known to pass through the immediate Project vicinity, and the Project Site is not within a landslide zone, a liquefaction zone, a fault rupture study area, or a tsunami inundation zone. The Project Site is located in the seismically active region of Southern California; however, through compliance with existing regulatory requirements as well as the measures identified under PM-GEO-1, above, and as described in the Geology Reports, the Project would not cause the geologic unit or soil to become unstable as a result of the proposed development, and the Project would thereby not result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, potential impacts related to geologic and soil stability would be less than significant, and the Project would be consistent with this mitigation measure.</p>

GEO-4: Potential to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	<u>MM-GEO-1(b)</u> . See above.	The Project already substantially conforms to this mitigation measure. As described in the Geology Reports prepared for the Project (Attachment L), the development of the Project will not result in hazards from future landsliding, settlement, slippage, shrinkage, or expansion, as long as the recommendations presented in the reports are followed. Moreover, pursuant to the City's existing codes and applicable regulations, design and construction of the Project would be required to incorporate any necessary measures to protect against risks associated with expansive soils. These measures include compliance with the Los Angeles Building Code, the Rules of General Application of the Grading Division of the Department of Building and Safety, the City's building permit requirements, and site-specific engineering recommendations based upon the recommendations of a licensed geotechnical engineer and a required final design-level geotechnical report containing the recommendations of the existing Geology Reports, which is to be approved by the City of Los Angeles Department of Building and Safety, as described in PM-GEO-1 , above.
GEO-5: Potential to have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.	No mitigation required.	No mitigation applies.
Greenhouse Gas Emissions and Climate Change	Project – Level Mitigation Measures	Project Consistency/Notes
GHG-1: Potential to directly or indirectly result in an increase in GHG emissions compared to existing conditions (2015).	No mitigation required.	No mitigation applies.
GHG-2: Potential to conflict with SB 375 GHG Emission Reduction Targets.	No mitigation required.	No mitigation applies.

GHG-3: Potential to conflict with AB 32 and or any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs.	No mitigation required.	No mitigation applies.
GHG Cumulative Impacts	<p><u>MM-GHG-3(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting greenhouse gas mitigation measures that have been used for projects in the SCAG region as set forth below, or through comparable measures identified by Lead Agency:</p> <ul style="list-style-type: none"> • Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision. • Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. • Off-site measures to mitigate a project's emissions. • Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: <ul style="list-style-type: none"> ○ Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction; ○ Use alternative (non-petroleum based) fuels; 	<p>The Project substantially conforms with this mitigation measure as described below. The Project's generation of GHG emissions would not be considered cumulatively considerable, as the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Specifically, as set forth in the PRC Section 21155 consistency findings for the Project as well as the RTP/SCS consistency findings under Attachment B, the Project is consistent with the 2016-2040 RTP/SCS, which is SCAG's regional plan for reducing GHG emissions. Moreover, pursuant to PM-USS-1 and PM-USS-2, the Project will comply with applicable water and energy conservation measures under CALGreen as well as the City's Green Building Ordinance, thereby reducing consumption of these resources and reducing GHG emissions accordingly. Therefore, no significant GHG emission impacts would occur for the Project.</p> <p>Additionally, as described under EN-2, the Project would be in compliance with the PRC's statutory requirements for a transportation priority project (TPP) building to be designed to be 15 percent more energy efficient than the applicable Title 24 standards and to be designed to achieve 25 percent less water usage than the average household use in the region. Specifically, the Project's energy use would be 15.6 percent less than Title 24, Part 6 (2019). The Project's water use would be 56.9 percent below the average household use in the region (Attachment E). The Project would achieve its energy efficiency through the implementation of multiple measures including, but not limited to, enhanced exterior wall and roof insulation, high-reflectance roofing, overhanging balconies for solar shading, high performance windows, daylighting controls and other forms of high-efficiency lighting, high-efficiency heating, ventilation, and air conditioning (HVAC) systems, and centralized hot water system and high-efficiency water fixtures. The Project would achieve its water efficiencies through multiple measures in compliance with the Los Angeles Green Building Code, including</p>

	<ul style="list-style-type: none"> ○ Deployment of zero- and/or near zero emission technologies as defined by CARB; ○ Use lighting systems that are energy efficient, such as LED technology; ○ Use the minimum feasible amount of GHG-emitting construction materials that is feasible; ○ Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production; ○ Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse; ○ Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy; ○ Incorporate design measures like WaterSense fixtures and water capture to reduce water consumption; ○ Use lighter-colored pavement where feasible; ○ Recycle construction debris to maximum extent feasible; ○ Protect and plant shade trees in or near construction projects where feasible; and ○ Solicit bids that include concepts listed above. <ul style="list-style-type: none"> ● Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles. ● Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network. ● Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations. ● Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs. ● Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles. 	<p>high efficiency water using appliances such as clothes washers and dishwashers, low flow fixtures and faucets, and efficient irrigation systems.</p> <p>Furthermore, as described under TRA-1, the Project would be subject to PM-TRA-2 and PM-TRA-3, which would implement a variety of transportation demand management (TDM) measures that would facilitate reductions in vehicle miles traveled (VMT) to and from the Project while enhancing transit and bicycle infrastructure in the vicinity of the Project Site.</p> <p>Collectively, these Project features and conditions as well as the Project's required regulatory compliance would result in reduced energy consumption, reduced VMT, and corresponding reduction in GHG emissions, consistent with the project-related mitigation identified by SCAG.</p>
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	<ul style="list-style-type: none"> Land use siting and design measures that reduce GHG emissions, including: <ul style="list-style-type: none"> Developing on infill and brownfields sites; Building high density and mixed use developments near transit; Retaining on-site mature trees and vegetation, and planting new canopy trees; Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse. 	
Hazards and Hazardous Materials	Project – Level Mitigation Measures	Project Consistency/Notes
HAZ-1: Potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	<p><u>MM-HAZ-1(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Hazardous Waste Control Act, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, the Hazardous Waste Source Reduction and Management Review Act of 1989, the California Vehicle Code, and other applicable laws and regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. 	<p>The Project already substantially conforms to this mitigation measure. Project construction would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials can include paints, adhesives, surface coatings, cleaning agents, fuels, and oils. All such materials would be transported, used, and disposed of in conformance with all applicable regulatory requirements, thereby eliminating the risk of potentially significant hazards. In addition, Project operation does not involve the routine transport, use, or disposal of potentially hazardous materials. Any potentially hazardous materials used would be similar to any other mixed-use urban development, and may include cleaning solvents, paints, and pesticides for landscaping. These potentially hazardous materials would be in and stored in accordance with regulatory requirements and manufacturers' instructions. Furthermore, the Project would adhere to regulatory requirements concerning source hazardous waste reduction measures and all applicable City ordinances. The localized nature of the potentially hazardous materials, adherence to regulatory requirements, and other best management practices such as proper use and storage ensure that impacts related to the routine transportation, use, and disposal of hazardous materials would be less than significant.</p>

	<ul style="list-style-type: none"> • Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials. • Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project. • Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: <ul style="list-style-type: none"> ○ The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. ○ The location of such hazardous materials. ○ An emergency response plan including employee training information. ○ A plan that describes the manner in which these materials are handled, transported and disposed. • Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects. • Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. • Avoid overtopping construction equipment fuel gas tanks. • During routine maintenance of construction equipment, properly contain and remove grease and oils. • Properly dispose of discarded containers of fuels and other chemicals. 	<p>In addition, due to the observed and presumed presence of asbestos containing materials (ACM) and lead based paint (LBP) at the Project Site, the Project measures identified below under PM-HAZ-1 through PM-HAZ-3 would be implemented. Furthermore, although the prior Phase I and II environmental assessments and preliminary endangerment assessment (PEA) prepared for the Project (see Attachment H) did not identify any recognized environmental conditions (RECs) or contaminants of potential concern (COPCs) at the Project Site, given the past presence of auto-related uses upon a portion of the Project Site, a soils management plan is to be prepared in the event that contaminated soil may be identified during Project construction activities, as set forth in PM-HAZ-4.</p> <p>PM-HAZ-1: Prior to demolition activities, an investigation for asbestos containing materials (ACMs) shall be conducted and identified asbestos shall be abated in accordance with the South Coast Air Quality Management District (SCAQMD)'s Rule 1403, as well as all other applicable City, State, and federal regulations.</p> <p>PM-HAZ-2: All building maintenance personnel, contractors, and any other person who may disturb confirmed ACM shall be notified of the contents of any existing asbestos survey and trained in accordance with Cal/OSHA regulations.</p> <p>PM-HAZ-3: Prior to demolition activities, an investigation for lead-based paint (LBP) shall be conducted and identified LBP shall be abated in accordance with applicable City, State, and federal regulations. Construction workers shall be properly trained in lead-related construction in order to avoid exposure of such workers to lead-containing material.</p> <p>PM-HAZ-4: Prior to issuance of a grading permit, the Project Applicant shall prepare a Soil Management Plan (SMP) for the Project. Soil management procedures shall be described so that hazardous soil can be separated from nonhazardous soil during excavation tasks and properly handled and disposed of in conformance with all applicable hazardous materials regulations. Soil management procedures outlined in the SMP shall be</p>
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		<p>followed during the Project's excavation and development phases to properly manage the various classes of soil and to minimize risk to workers and the public during construction.</p> <p>Therefore, the City has determined that the Project's compliance with existing regulatory measures as well as implementation of the above Project measures is equal to or more effective than MM-HAZ-1(b).</p>
<p>HAZ-2: Potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</p>	<p><u>MM-HAZ-1(b)</u>. See above.</p>	<p>As described above, under HAZ-1, the Project would substantially comply with MM-HAZ-1(b) through compliance with all applicable regulatory requirements and incorporation of identified Project measures. In addition, during construction, all potentially hazardous materials encountered and used at the Site would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. This ensures that potential risks associated with construction related activities are minimized.</p> <p>Furthermore, as summarized in the PEA prepared for the Project Site (Attachment H), a Phase I Environmental Site Assessment (ESA) and a Phase II investigation that included soil sampling (both of which are attached to the PEA), was conducted for the Site. Sampling results from the Phase II investigation were used in order to determine if any contaminants were detected onsite. Contaminants detected in soil were compared to their respective screening levels in order to determine if the contaminant was a contaminant of potential concern (COPC).</p> <p>The Project Site had residual levels of TPH in the gasoline, diesel, and motor oil range in soil; however, the detected levels for the various groundwater sampling results indicated that VOC and metals are below applicable Environmental Screening Levels (ESLs) and maximum contaminant levels while some TPH concentrations exceeded applicable ESLs. However, the Phase II investigation determined that samples from the Site are biased towards heavy-chain hydrocarbons, which would not be typical for a release associated with a service station since the heavy-chain hydrocarbons are not very mobile. It also stated that the Site is located within approximately one mile of a methane buffer zone. Based on this, the distribution of TPH carbon chain</p>

		<p>ranges, and the absence of significant metal concentrations in groundwater (which would be suggestive of a petroleum hydrocarbon release), TPH in groundwater at the Site is considered to be naturally occurring and, therefore, would not result in human health impacts for potential future receptors. No further analysis or investigation is necessary. (Attachment H). Moreover, as described under <u>MM-HAZ-1(b)</u>, the Project would incorporate Project measures PM-HAZ-1 through PM-HAZ-4, which would prevent the potential release of hazardous materials into the environment in connection with the abatement of ACM or LBP, or the potential encountering of unanticipated contaminated soils during construction activities. Therefore, the Project is consistent with this mitigation measure.</p>
<p>HAZ-3: Potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.</p>	<p><u>MM-HAZ-1(b)</u>. See above.</p>	<p>The Project Site is not within one-quarter mile of an existing or proposed school. Notwithstanding, and as described above under HAZ-1, the Project would substantially conform with MM-HAZ-1(b) through compliance with existing regulatory requirements and implementation of Project measures PM-HAZ-1 through PM-HAZ-4. In addition, during construction and operation, the Project would not emit or handle hazardous materials or substances other than those typically used in other mixed-use residential and commercial developments. Therefore, notwithstanding the inapplicability of HAZ-3, the Project is consistent with this mitigation measure.</p>
<p>HAZ-4: Potential to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.</p>	<p><u>MM-HAZ-4(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines; SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and Clean-up Act, and the Uniform Building Code, and County and City building standards, and all applicable federal, state, and local laws and regulations governing hazardous waste sites, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p>	<p>The Project is in substantial conformance with this mitigation measure as described below.</p> <p>As part of the Phase I ESA prepared for the Project Site and summarized in the PEA (Attachment H), regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project Site and properties within the standard search radii. The databases searched as a result of Government Code Section 65962.5 are known as the "Cortese List" and include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency. No hazardous materials that may pose a risk at or to the Project Site were listed in the databases, and the Project Site is not identified as a hazardous materials site.</p> <p>Furthermore, pursuant to PM-HAZ-1 through PM-HAZ-3, described above under <u>MM-HAZ-1(b)</u>, the removal of any identified asbestos-containing materials (ACM) or lead-based</p>

	<ul style="list-style-type: none"> • Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. • Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. • Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. • Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. • Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. • Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. • Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. • Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or 	<p>paint (LBP) would be abated/removed in conformance with all applicable regulatory requirements, thereby eliminating any risk of creating a significant hazard. These regulatory requirements are consistent with the relevant measures identified in MM-HAZ-4(b) for ACM and LBP.</p> <p>Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment.</p>
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	<p>if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority.</p> <ul style="list-style-type: none">• Use best management practices (BMPs) regarding potential soil and groundwater hazards.• Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies.• Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building.• Prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site.• Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction.• If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to:	
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	<p>California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations.</p> <ul style="list-style-type: none"> • Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. • Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. • Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. 	
<p>HAZ-5: Potential for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.</p>	<p>No mitigation required.</p>	<p>No mitigation applies.</p>

HAZ-6: Potential for a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.	No mitigation required.	No mitigation applies.
HAZ-7: Potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	<u>MM-TRA-5(b)</u> . See below.	The Project already substantially conforms to this mitigation measure through compliance with existing regulatory requirements as well as incorporation of specific Project measures. Specifically, an emergency response plan would be submitted to the Los Angeles Fire Department (“LAFD”) during LAFD’s review of the Project plans as part of the standard building permit review process per LAMC Section 57.118 (see PS-1). Moreover, the Project does not propose permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. Furthermore, no full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be significantly impeded. As described in TRA-5 , below, the Project would be subject to PM-TRA-1 , which requires the preparation of and City approval of a Construction Traffic Management Plan, which would ensure that access for emergency service providers and any evacuation routes would be maintained during construction activities. Therefore, incorporation of these measures would achieve conformance with MM-TRA-5(b).
HAZ-8: Potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	<u>MM-HAZ-8(b)</u> : Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands; that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with local general plans, specific plans, and regulations provided by County and City fire departments, as applicable and feasible. Such	No mitigation applies. This mitigation measure does not apply to the Project, because the Project Site is located in a fully urbanized area and there are no wildlands in the vicinity, and is not near a wildland fire hazard. ¹⁴ Furthermore, the Project is subject to regulatory requirements, such as adherence to the City’s Fire Code requirements, such as submitting a fire safety plan to LAFD for their review and approval pursuant to LAMC Section 57.118.

¹⁴ City of Los Angeles, ZIMAS Parcel Profile Reports for 4100 Sunset Boulevard and 1071-1089 Manzanita Street (Assessor Parcel Numbers 5429-002-002, -003, -004, and 018), accessed May 29, 2020.

	<p>measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none">• Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures would be applied to eaves, vents, windows, and doors to avoid any gaps that would allow intrusion by flame or embers.• Adhere to the Multi-Jurisdictional Hazards Mitigation Plan, as well as local general plans, including policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training, sustainable development, brush management, and public outreach.• Encourage the use of fire-resistant vegetation native to Southern California and/or to the local microclimate (e.g., vegetation that has high moisture content, low growth habits, ignition-resistant foliage, or evergreen growth), eliminate brush and chaparral, and discourage the use of fire-promoting species especially non-native, invasive species (e.g., pampas grass, fennel, mustard, or the giant reed) in the immediate vicinity of development in areas with high fire threat.• Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of non-native, invasive species to promote healthy, natural ecosystem regrowth. Native vegetation is more likely to have deep root systems that prevent slope failure and erosion of burned areas than shallow-rooted non-natives.• Submit a fire safety plan (including phasing) to the Lead Agency and local fire agency for their review and approval. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase.• Utilize Fire-wise Land Management by encouraging the use of fire-resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat.	
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	<ul style="list-style-type: none"> Promote Fire Management Planning that would help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts. Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat. 	
Hydrology and Water Quality	Project – Level Mitigation Measures	Project Consistency/Notes
<p>HYD-1: Potential to violate any water quality standards or waste discharge requirements.</p>	<p><u>MM-HYD-1(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all applicable laws, regulations, and health and safety standards set forth by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements in a manner that conforms with applicable water quality standards and/or waste discharge requirements, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: 	<p>The Project already substantially conforms to this mitigation measure, because the Project would be required to comply with existing regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City. Specifically, pursuant to PM-GEO-1, discussed above, a final design-level geotechnical report shall be reviewed and approved by LADBS that incorporates the recommendations of the Project's existing Geology Reports and demonstrates compliance with the City's existing geology and soils requirements, including but not limited to LAMC Section 91.7013 pertaining to erosion control and drainage devices, Section 91.7014 regarding flood and mudflow protection, and Section 91.7016 regarding regulations for areas that are subject to slides and unstable soils. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the City's discharge requirements, pursuant to PM-HYD-1 below, would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements and minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, as noted in the Geology Reports, given the fact that groundwater has previously been encountered at depths higher than the Project's proposed excavation depth for its subterranean parking levels, it is possible that groundwater may be encountered during excavation and dewatering may be required. Pursuant to PM-HYD-2 below, any such required dewatering would be conducted in accordance with applicable regulatory requirements.</p>

	<ul style="list-style-type: none"> ○ U.S. Army Corps of Engineers (Corps): Section 404. Permit approval from the Corps should be obtained for the placement of dredge or fill material in Waters of the U.S., if any, within the interior of the project site, pursuant to Section 404 of the federal Clean Water Act ○ Regional Water Quality Control Board (RWQCB): Section 401 Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above. ○ California Department of Fish and Wildlife (CDFW): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires authorization from CDFW. <ul style="list-style-type: none"> ● Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. ● Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. ● Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies. ● Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. ● Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. ● Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. 	<p>During operation the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP) pursuant to PM-HYD-3 below, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.</p> <p>To ensure consistency with MM-HYD-1(b), the following Project measures would be implemented:</p> <p>PM-HYD-1: Stormwater Pollution (Demolition, Grading, and Construction Activities)</p> <ul style="list-style-type: none"> ● Leaks, drips and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains. ● All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills. ● Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible. ● Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting. <p>PM-HYD-2: Potential Dewatering System</p> <ul style="list-style-type: none"> ● Prior to the issuance of any permit for excavation, the Applicant shall, in consultation with the Department of Building and Safety, submit a Dewatering Plan to the Los Angeles Bureau of Sanitation for review and approval, which shall be implemented if it is determined by the Department of Building and Safety
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	<ul style="list-style-type: none"> • Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters. • Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel. • Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. • Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible. • If a proposed project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out. 	<p>that a dewatering system is necessary for the Project. Such plan shall indicate estimates for how much water is anticipated to be pumped and how the extracted water will be utilized and/or disposed of.</p> <ul style="list-style-type: none"> • Extracted groundwater shall be pumped to a beneficial on-site use such as, but not limited to: <ul style="list-style-type: none"> ○ landscape irrigation; ○ decorative fountains or lakes; ○ toilet flushing; or ○ cooling towers • Return water to the groundwater basin by an injection well. <p>PM-HYD-3: Standard Urban Stormwater Mitigation Plan</p> <ul style="list-style-type: none"> • Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control which requires the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. Applicants shall meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board, including the following: • Project applicants shall be required to implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing 3/4 inch of rainfall in a 24 hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be required. • Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increase peak stormwater discharge rate will result in increased potential for downstream erosion. • Clearing and grading of native vegetation at the Project Sites shall be limited to the minimum needed to build lots, allow access, and provide fire protection.
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		<ul style="list-style-type: none">• Trees and other vegetation at each site shall be maximized by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.• Riparian areas and wetlands shall be preserved.• Natural vegetation shall be promoted by using parking lot islands and other landscaped areas.• Any connection to the sanitary sewer shall have authorization from the Bureau of Sanitation.• Appropriate erosion control and drainage devices, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, shall be incorporated as specified by Section 91.7013 of the Building Code. Outlets of culverts, conduits, or channels shall be protected from erosion by discharge velocities by installing a rock outlet protection. Rock outlet protection is a physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe. Sediment traps shall be installed below the pipe-outlet. The outlet protection shall be inspected, repaired, and maintained after each significant rain.• All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as NO DUMPING - DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.• Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, shall be posted at public access points along channels and creeks within the Project area.• Legibility of stencils and signs shall be maintained.• Materials with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar structure that prevent contact with runoff spillage to the stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.• The storage area shall be paved and sufficiently impervious to contain leaks and spills.• The storage area shall have a roof or awning to minimize collection of stormwater within the secondary containment area.
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		<ul style="list-style-type: none"> • The owner(s) of the property shall prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer's instructions. • (Multiple Residential Dwellings of 10+ Units of Single- or Multi-Family, incl. Subdivisions): • Impervious surface area shall be reduced by using permeable pavement materials where appropriate, including: pervious concrete/asphalt; unit pavers, i.e. turf block; and granular materials, i.e. crushed aggregates, cobbles. • Roof runoff systems shall be installed where site is suitable for installation. Runoff from rooftops is relatively clean, can provide groundwater recharge and reduce excess runoff into storm drains. • Messages that prohibit the dumping of improper materials into the storm drain system shall be painted adjacent to storm drain inlets. Prefabricated stencils can be obtained from the Dept. of Public Works, Stormwater Management Division. • An efficient irrigation system shall be designed to minimize runoff including: drip irrigation for shrubs to limit excessive spray; shutoff devices to prevent irrigation after significant precipitation; and flow reducers. <p>Therefore, through compliance with existing regulatory requirements and implementation of the above Project measures, the Project would be consistent with this mitigation measure.</p>
HYD-2: Potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there	MM-HYD-2(b): Consistent with the provisions of the Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. Where the Lead Agency has	The Project already substantially conforms to this mitigation measure, because the Project will implement PM-HYD-1 through PM-HYD-3 , as described above, pursuant to which the Project would comply with existing regulations regarding potential dewatering as well as low-impact development requirements. Compliance with these regulatory requirements would avoid or

<p>would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).</p>	<p>identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with applicable laws, regulations, and health and safety standards set forth by federal, state, regional, and local authorities that regulate groundwater management, consistent with the provisions of the Groundwater Management Act and implementing regulations, including recharge in a manner that conforms with federal, state, regional, and local standards for sustainable management of groundwater basins, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. • Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. • Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate. 	<p>reduce potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies.</p>
<p>HYD-3: Potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on or off site.</p>	<p><u>MM-HYD-1(b)</u>. See above.</p>	<p>As discussed under HYD-1, the Project already substantially conforms to this mitigation measure, because the Project would implement PM-HYD-1 through PM-HYD-3, which include stringent controls imposed via the City's LID Ordinance and SUSMP regulations. Runoff associated with the Project would be either directed in non-erosive drainage devices to landscaped areas for evaporation and/or directed to the existing City storm drain system, captured in on-site below grade cisterns, and/or directed to the existing City storm drain system, and thus, would not encounter exposed soils. With the development of the Project, the Project Site's current largely impervious nature would be maintained, and the Project's drainage pattern would be generally similar to the existing pattern at the Project Site</p>

		currently by conveying runoff to the City storm drain system. Thus, operation of the Project would not result in substantial hydrological changes or erosion or siltation on- or off-site, nor would the Project result in the alteration of the course of a stream or river.
HYD-4: Potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site.	<u>MM-HYD-1(b)</u> . See above.	As described above under HYD-1 , the Project already substantially conforms to this mitigation measure, and through compliance with existing regulatory measures as well as implementation of PM-HYD-1 through PM-HYD-3 , would not alter the existing drainage pattern of the area surrounding the Project Site. Furthermore, given that there are no waterbodies within or near the Project Site, flooding is not expected to occur on- or off-site.
HYD-5: Potential to substantially create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff.	<u>MM-HYD-1(b)</u> . See above.	As discussed under HYD-1 , the Project already substantially conforms to this mitigation measure, because the Project would be subject to the provisions of the LID Ordinance and would also implement PM-HYD-1 through PM-HYD-3 , and runoff associated with the Project would be directed in non-erosive drainage devices to either landscaped areas for evaporation, captured and conveyed to on-site below grade cisterns, and/or directed to the existing City storm drain system. Pursuant to the City's review of the Project's compliance with existing regulations including applicable SUSMP requirements, stormwater runoff from the Project Site would be minimized and water quality standards would be preserved, thereby avoiding potential impacts to the existing stormwater drainage system.
HYD-6: Potential to otherwise substantially degrade water quality.	<u>MM-HYD-1(b)</u> . See above.	As discussed under HYD-1 , the Project already substantially conforms to this mitigation measure, because the Project is required to implement all applicable regulatory requirements to protect water quality and would also implement PM-HYD-1 through PM-HYD-3 to further ensure consistency with MM-HYD-1(b).
HYD-7: Potential to place housing within a 100-year flood hazard area as mapped on a federal flood hazard boundary or flood insurance rate map	No mitigation required.	No mitigation applies.

or other flood hazard delineation map.		
HYD-8: Potential to place within a 100-year flood hazard area structures that would impede or redirect flood flows.	<p><u>MM-HYD-8(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows in a 100-year flood hazard area that are within the jurisdiction and authority of the Flood Control District, County Public Works Departments, local agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all federal, state, and local floodplain regulations, consistent with the provisions of the National Flood Insurance Program, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program. • Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change. 	No mitigation is required , as the Project Site is not within a 100-year or 500-year flood hazard area according to FEMA's Flood Insurance Rate Map. ¹⁵ Thus, the Project would not place structures in an area that would impede or redirect flood flows.
HYD-9: Potential to expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.	<u>MM-HYD-8(b)</u> . See above.	No mitigation is required. The Project Site is located approximately three miles southeast of and downslope from the Hollywood Reservoir and approximately 0.9 miles from the Silver Lake Reservoir. The Project Site is located near but not within a potential inundation area. Nonetheless, these reservoirs, as with other reservoirs and dams in California, are continually being monitored by various governmental agencies (such as the State of California Division of Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam and reservoir failure. Current design and construction practices and

¹⁵ Federal Emergency Management Agency (FEMA), FEMA Flood Map Service Center, Parcel information for 4100 Sunset Boulevard and 1071-1089 Manzanita Street (Assessor Parcel Numbers 5429-002-002, -003, -004, and 018), accessed May 29, 2020.

		ongoing programs of review, modification, or total reconstruction of existing dams and reservoirs are intended to ensure that all dams and reservoirs are capable of withstanding the maximum credible earthquake for the Project Site. Therefore, the minimal risk of flooding from potential dam or levee failure would not be exacerbated by the development of the Project. Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam.
HYD-10: Potential for inundation by seiche, tsunami, or mudflow.	<u>MM-HYD-8(b)</u> . See above.	No mitigation is required. The Project Site is located approximately 12 miles away from the Pacific Ocean, with no nearby major waterbodies. Therefore, risks associated with seiches or tsunamis would be considered extremely low at the Project Site. In addition, the Project Site is located in an urbanized portion of the City of Los Angeles and is relatively flat, which limits the potential for inundation by mudflow. Thus, there is low potential for inundation by seiche, tsunami, or mudflow.
Land Use and Planning	Project – Level Mitigation Measures	Project Consistency/Notes
LU-1: Potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	<p><u>MM-LU-1(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with zoning and ordinance codes, general plans, land use plan, policy, or regulation of an agency with jurisdiction over the project, as applicable and feasible. Such measures may include the following, and/or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan. 	<p>No mitigation is required, as the Project is consistent with applicable regional and local land use plans, policies, and regulations, as described below.</p> <p>As set forth in this exemption document, the Project is consistent with the general use designation, density, building intensity, and applicable policies of SCAG’s 2016-2040 RTP/SCS (see PRC Section 21155(a) consistency determination) as well as the RTP/SCS’s goals and policies (see Attachment B). Moreover, as discussed under PHE-1, the Project is consistent with the growth projections contained in the RTP/SCS. Accordingly, the Project does not conflict with the 2016-2040 RTP/SCS.</p> <p>In addition, the Project is consistent with applicable policies in the City of Los Angeles General Plan, including Framework Element Objectives 3.13 and 4.2 regarding the development of mixed-use multi-family residential and commercial developments along corridors that are well-served by transit. In addition, the Project’s market-rate and affordable units will support Objective 2.2 of the General Plan’s Housing Element by developing mixed-income housing and amenities near transit.</p>

		<p>The Project Site is subject to the Hollywood Community Plan, and the Project's multi-family residential and commercial uses are consistent with the Project Site's land use designation of Highway Oriented Commercial and the existing zoning designation (C2-1D). Moreover, as a mixed-use transit-oriented affordable housing project, the Project is consistent with the Community Plan's goals and objectives regarding the provision of housing to satisfy the needs of all economic segments of the community (Objective 3), to enhance the residential character of the community (Objective 3), and to encourage the expansion and improvement of public transportation (Objective 6) by intensifying the development intensity of a transit-proximate infill location and therefore attracting more residents and commercial patrons who may utilize transit options.</p> <p>Additionally, the Project's proposed density, floor area, and development envelope are consistent with State density bonus law and the City's implementing density bonus ordinance, which permit density increases and associated incentives, concessions, and waivers of development standards in conjunction with the provision of affordable housing.</p> <p>Given the Project's existing consistency with applicable regional and local land use plans, policies, and regulations, potential land use impacts would be less than significant, and no mitigation is required.</p>
<p>LU-2: Potential to physically divide an established community.</p>	<p><u>MM-LU-2(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid the creation of barriers that physically divide such communities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> Consider alignments within or adjacent to existing public rights-of-way. 	<p>No mitigation applies. This mitigation is not applicable to the Project because the Project does not contain features or new infrastructure that would cause a permanent disruption in the physical arrangement of the established community.</p>

	<ul style="list-style-type: none"> Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods. Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: <ul style="list-style-type: none"> Alignment shifts to minimize the area affected. Reduction of the proposed right-of-way take to minimize the overall area of impact. Provisions for bicycle, pedestrian, and vehicle access across improved roadways. Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project. Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities. 	
<p>LU-3: Potential to conflict with any applicable habitat conservation plan or natural community conservation plan.</p>	<p>See <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-BIO-4(b)</u>, <u>MM-BIO-5(b)</u>, and <u>MM-BIO-6(b)</u>.</p>	<p>The Project would be in substantial conformance with these mitigation measures. As discussed above, the Project would be consistent with MM-BIO-1(b), MM-BIO-2(b), MM-BIO-4(b), and MM-BIO-5(b), as it would be developed on an existing commercially zoned parcel that is currently fully developed with an approximately 9,800 square foot two-story building that has been in existence since 1926 as well as surrounding surface parking areas. The Project would not be developed on open space, and development of the Project would not result in adverse effects to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or the California Native Plant Society. It would also not result in any adverse effects to any occupied habitat, potentially suitable habitat, or designated critical habitat.</p>

		<p>As discussed in the Tree Report prepared for the Project and included as Attachment J, none of the on-site or off-site trees are considered protected by the City's Tree Preservation Ordinance. Furthermore, to avoid and potential impacts to nesting birds, the removal or pruning of trees in connection with the development of the Project would occur in accordance with the MBTA and state and local requirements, as set forth in PM-BIO-1.</p> <p>As described above under MM-Bio-3(b), the Project Site does not include any protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies, and therefore this mitigation measure does not apply.</p> <p>As described above under MM-Bio-6(b), the Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not within or adjacent to any existing Significant Ecological Area. Therefore, the Project is consistent with these mitigation measures.</p>
Mineral Resources	Project – Level Mitigation Measures	Project Consistency/Notes
<p>MIN-1: Potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.</p>	<p><u>MM-MIN-1(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan that are within the jurisdiction and responsibility of the California Department of Conservation, and/or Lead Agencies.</p> <p>Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with SMARA, California Department of Conservation regulations, local general plans, specific plans, and other laws and regulation governing mineral or aggregate resources, as applicable and feasible. Such measures may include the following, other comparable measures identified by the Lead Agency:</p>	<p>No mitigation applies. The Project Site is fully developed and no oil wells are present. There are no oil extraction operations or drilling or mining of mineral resources at the Project Site, nor is the Project Site within an area identified for such uses. Therefore, there will be no impacts and thus, this mitigation measure does not apply.</p>

	<ul style="list-style-type: none"> • Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. • Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures: <ul style="list-style-type: none"> ○ Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. ○ Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. ○ Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. ○ Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources. 	
MIN-2: Potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.	<u>MM-MIN-1(b)</u> . See above.	No mitigation applies. There are no oil extraction operations or drilling or mining of mineral resources at the Project Site, nor is the Project Site within an area identified for such uses. Therefore, development of the Project would not result in the loss of availability of a mineral resource that would be of value to the residents of the State or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Therefore, Mitigation Measure MM-MIN-1(b) would not apply.
Noise	Project – Level Mitigation Measures	Project Consistency/Notes

<p>NOISE-1: Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.</p>	<p>MM-NOISE-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure consistency with the Federal Noise Control Act, California Government Code Section 65302, the Governor's Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health and safety standards set forth by federal, state, and local authorities that regulate noise levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Install temporary noise barriers during construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. • Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance. Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices. • Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels. • Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. • Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. 	<p>The Project will substantially conform to this mitigation measure through required compliance with applicable noise regulations as well as incorporation of Project measures intended to reduce increases in existing ambient noise levels resulting from the Project's construction activities. These Project measures are identified below:</p> <p>PM-NOI-1:</p> <ul style="list-style-type: none"> • 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, pursuant to LAMC Section 41.40. • Construction staging areas for the Project Site shall be as far from sensitive receptors as possible. • Temporary sound barriers, capable of achieving a sound attenuation of at least 10 dBA (e.g., construction sound wall or sound blankets), and capable of blocking the line-of-sight between the adjacent sensitive receptors, shall be installed. • All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices. • Two weeks prior to the commencement of construction at each Project Site, notification shall be provided to all surrounding residential, school, synagogue, studio, and other uses within 2,000 feet of the construction sites that discloses the construction schedule, including the types of activities and equipment that would be occurring/operating throughout the duration of the construction period. • Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 50 feet from abutting sensitive receptors. • Construction haul trucks shall avoid accessing residential streets and shall enter and exit the Project Site via Sunset Boulevard. • Construction workers shall park at designated locations and shall be prohibited from parking on nearby residential streets. • A noise disturbance coordinator shall be established to respond to local complaints about construction noise.
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	<ul style="list-style-type: none"> • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. • Designate an on-site construction complaint and enforcement manager for the project. • Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. • Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors. • Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors. • Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive receptors to the maximum extent feasible. • Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way. • Use noise barriers to protect sensitive receptors from excessive noise levels during construction. • Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls. • Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. 	<p>The disturbance coordinator shall determine the cause of the noise complaints and shall be required to implement reasonable measures such that the complaint is resolved. Notices shall be sent to neighboring land uses within 500 feet of the construction sites listing the telephone number for the disturbance coordinator. Signs shall also be posted at the Project Sites, legible at a distance of 50 feet, that provide contact information for the noise disturbance coordinator.</p> <ul style="list-style-type: none"> • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. • Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. • Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors. • Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors.
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	<ul style="list-style-type: none"> Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. 	<ul style="list-style-type: none"> Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. <p>Through required compliance with regulatory requirements and implementation of the above Project measures, the Project will be consistent with this mitigation measure.</p>
<p>NOISE-2: Result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.</p>	<p><u>MM-NOISE-1(b)</u>. See above</p> <p><u>MM-NOISE-2(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of vibration impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Federal Transportation Authority and Caltrans guidance documents, county or city transportation commission, noise and vibration ordinances and general plan noise elements for the counties and cities where projects are undertaken and other health and safety regulations set forth by federal state, and local authorities that regulate vibration levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where 	<p>See above for discussion of consistency with MM-NOISE-1(b).</p> <p>The Project will substantially conform to MM-Noise-2(b) due to its required compliance with existing regulations, including LAMC Section 91.3307.1., which requires adjoining public and private property to be protected from damage during construction, remodeling and demolition work, as well as incorporation of Project measures intended to further reduce vibration levels resulting from the Project's construction activities to a less than significant level, including those measures identified in the Project's Vibration Technical Report (Attachment M), as identified below under PM-NOI-2.</p> <p>PM-NOI-2:</p> <ul style="list-style-type: none"> Adjoining public and private property shall be protected from damage during construction, remodeling and demolition work in compliance with all applicable City regulations, including LAMC Section 91.3307.1. Protection must be provided for footings, foundations, party walls, chimneys, skylights and roofs. Construction activities shall utilize rubber tired equipment in place of steel-track equipment whenever feasible. Construction haul trucks shall avoid driving over potholes and dips when arriving at or leaving the Project Site. The construction contractor shall stage and warm-up construction equipment as far from nearby sensitive receptors as possible. The noise disturbance coordinator identified in PM-NOI-1 shall also be responsible for receiving local complaints about construction vibration. The disturbance coordinator shall determine the cause of

	<p>pile driving noise can be shielded more effectively by a noise barrier/curtain.</p> <ul style="list-style-type: none"> For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the use of more than one pile driver to shorten the total pile driving duration. 	<p>the vibration complaints and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction sites and all signs, legible at a distance of 50 feet, at the construction sites shall list the telephone number for the disturbance coordinator.</p> <ul style="list-style-type: none"> For construction activities at the project site, prohibit use of a vibratory roller or equipment with a similar vibratory profile (e.g., hydromill, clam shovel drop, pile drivers) within 15 feet of the northwest property line. Any construction activity directly along the northwest property line of the project site shall only use small bulldozers, rubber tired equipment (in lieu of tracked vehicles), or equivalent equipment with a similar vibratory profile of 0.026 inches per second or less at 25 feet. The Applicant shall retain a qualified acoustical engineer to review the proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the Project Site's northwestern property line where heavy construction equipment (e.g., large bulldozer and drill rig) would be operating within 25 feet of affected buildings on Gateway Avenue between Myra Avenue and Santa Monica Boulevard. <ul style="list-style-type: none"> The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in inch/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a warning level of 0.25 inches/second (PPV) and a regulatory level of 0.3 inches/second (PPV). The system shall also provide real-time alert when the vibration levels exceed either of the two preset levels. In the event the warning level of 0.25 inches/second (PPV) is triggered, the contractor shall identify the source of
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		<p>vibration generation and provide steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.</p> <ul style="list-style-type: none"> ○ In the event the regulatory level of 0.3 inches/second (PPV) is triggered, the contractor shall halt the construction activities in the vicinity of affected buildings and visually inspect the buildings for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide steps to reduce the vibration level. Vibration measurement shall be made with the new construction method to verify that the vibration level is below the warning level of 0.25 inches/second (PPV). Construction activities may then restart. <p>In the event damage occurs due to construction vibration, such materials shall be repaired in consultation with a qualified architect.</p> <p>Through required compliance with regulatory requirements and implementation of the above Project measures, the Project will be consistent with this mitigation measure.</p>
<p>NOISE-3: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.</p>	<p><u>MM-NOISE-1(b)</u>. See above.</p>	<p>See above consistency analysis regarding MM-NOISE-1(b). The Project already substantially conforms to this mitigation measure through compliance with existing regulatory requirements. Specifically, Project-related operational noise sources such as roof-top air conditioning units, a ground-floor pad-mounted transformer, and ground floor parking structure vehicle movements will be required to comply with LAMC Section 112.02's noise level standards, which restrict noise level increases from exceeding 5 dBA over the existing or presumed ambient noise level at an adjacent property line. In addition, LAMC Section 114.02 prohibits the operation of any motor driven vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. To ensure compliance with these regulatory requirements, various operational noise measures are identified below under PM NOI-3 and PM-NOI-4:</p>

		<p>PM-NOI-3: The Project shall provide sufficient noise attenuation measures to achieve compliance with the City of Los Angeles Building Code, Section 91.1207.14.2 regarding the allowable 45 dBA CNEL interior noise level standard.</p> <p>PM-NOI-4: The Project shall incorporate measures to ensure compliance with the City's operational noise regulations, including but not limited to LAMC Sections 112.02 and 114.02. Such measures shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • The Project shall site all HVAC systems on the roof of the Project buildings when appropriate to minimize or eliminate direct line of sight to adjacent sensitive receptors. Such equipment shall be enclosed and include sound insulation. Where ground-level HVAC equipment is better able to minimize or eliminate direct line of sight to adjacent receptors, HVAC systems shall be enclosed and surrounded with sound insulation. • The Project shall utilize central air conditioning and heating in each new residential unit. • The Project shall include double-paned windows on all of the exterior windows for each residential unit. • The Project shall include vegetation sound walls for any ground floor residential units (e.g., planting vegetation on the exterior of ground floor residential units to create a natural sound barrier). • <p>Through incorporation of the measures identified under PM-NOI-3 and PM-NOI-4, the Project will satisfy the City's operational noise standards and be consistent with the mitigation measures identified by SCAG.</p>
NOISE-4: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	<u>MM-NOISE-1(b)</u> . See above.	See above discussion of consistency with MM-NOISE-1(b). The Project already substantially conforms to this mitigation measure through compliance with existing regulatory requirements as well as implementation of the noise-related Project measures described under NOISE-1 through NOISE-3 , above.
NOISE-5: For a project located within an airport	No mitigation required.	No mitigation applies.

land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in the exposure of people residing or working in the project area to excessive noise levels.		
NOISE-6: For a project within the vicinity of a private airstrip, result in the exposure of people residing or working in the project area to excessive noise levels.	No mitigation required.	No mitigation applies.
Population, Housing, and Employment	Project – Level Mitigation Measures	Project Consistency/Notes
PHE-1: Potential to induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	<u>MM-LU-1(b)</u> . See above.	<p>No mitigation applies. As discussed above under LU-1 and LU-2, no mitigation is required as the Project is consistent with the goals and policies of regional and local plans, and does not propose features or new infrastructure that would disrupt the physical arrangement of the established community or induce new growth in the vicinity of the Project Site. Accordingly, the Project's use and development envelope are consistent with SCAG's 2016-2040 RTP/SCS, the City of Los Angeles General Plan, the City's zoning code, and State and City density bonus law.</p> <p>In addition, the projected population increase at the Project Site would be consistent with SCAG's population projections for the City. Specifically, the addition of 221 residents represents a 0.0057 percent increase in resident population estimates for the City in 2012, 0.0053 percent of the estimated population in 2024 (the Project's anticipated buildout year), and 0.0048 percent of the estimated population in the City by 2040.^{16,17} This increase</p>

¹⁶ The latest Citywide average household size is 2.42 residents per multi-family housing unit, based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

2.42 persons/housing unit x 91 units = 221 residents

¹⁷ Population Year 2012: (221 residents/3,845,500 total City of LA residents) x 100 = 0.0057 %
Population Year 2024: (221 residents/4,172,886 total projected City of LA residents) x 100 = 0.0053 %

		<p>would not be considered a substantial increase in population for the area and is within the anticipated SCAG forecast for population. As such, population growth associated with the proposed project would be less than significant and no mitigation measures are required.</p> <p>These 91 residential units would represent a 0.0068 percent increase in the overall estimated housing units for the City in 2012, 0.0048 percent of the estimated housing units in 2024, and 0.0054 percent of the estimated housing units for the City by 2040.¹⁸ This increase would not be considered a substantial increase in housing for the area as the addition of 91 new multi-family residential units is within the anticipated housing increases based on SCAG projections for housing. As such, housing growth associated with the proposed project would be less than significant and no mitigation measures are required.</p> <p>Due to its consistency with these regional and local plans and policies, the Project would not induce significant growth or accelerate development in an undeveloped area that exceeds projected/planned levels. Furthermore, the Project would respond to the general need for more housing in the region, which would help accommodate the growth forecast for the City. Accordingly, these mitigation measures are not relevant to the Project.</p>
PHE-2: Potential to displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere.	<u>MM-PHE-2(b)</u> . Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to displacement that are within the jurisdiction and responsibility of Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to minimize the displacement of existing housing and people and to ensure compliance with local jurisdiction's housing elements of their general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:	No mitigation applies. This mitigation measure pertains to potential displacement effects associated with the acquisition of rights-of-way and subsequent construction of transportation projects, and therefore is not applicable to the Project. Notwithstanding, the Project would not displace any existing housing, as it would replace existing nonresidential uses at the Project Site. Furthermore, the Project would develop 91 new housing units at the Project Site, including 8 affordable housing units. Accordingly, development of the Project would not necessitate the construction of replacement housing.

¹⁸

Population Year 2040: (221 residents/4,609,400 total projected City of LA residents) x 100 = 0.0048 %
Housing Year 2012: (91 units/1,325,500 total City of LA units) x 100 = 0.0068 %
Housing Year 2024: (91 units/1,481,843 total projected City of LA units) x 100 = 0.0061 %
Housing Year 2040: (91 units/1,690,300 total projected City of LA units) x 100 = 0.0054 %

	<ul style="list-style-type: none"> Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. Prioritize the use existing ROWs, wherever feasible. Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. 	
PHE-3: Potential to displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	<u>MM-PHE-2(b)</u> . See above.	No mitigation applies. As discussed above under PHE-2 , this mitigation measure is not relevant to the Project, but nonetheless, the Project would not displace any residential uses or residents, and would therefore not necessitate the construction of any replacement housing.
Public Services	Project – Level Mitigation Measures	Project Consistency/Notes
PS-1: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and emergency response services.	<p>Mitigation Measures <u>MM-AES-1(b)</u>, <u>MM-AES-3(b)</u>, <u>MM-AES-4(b)</u>, <u>MM-AF-1(b)</u>, <u>MM-AF-2(b)</u>, <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-CUL-1(b)</u>, <u>MM-CUL-2(b)</u>, <u>MMCUL-3(b)</u>, <u>MM-CUL-4(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-HYD-1(b)</u>, <u>MM-USS-3(b)</u>, <u>MM-USS-4(b)</u>, and <u>MM-USS-6(b)</u>.</p> <p><u>MM-PS-1(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the performance objectives established in the adopted county and city general plans, to provide sufficient structures and buildings to accommodate fire and emergency response, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:</p>	<p>See consistency discussions above and below regarding <u>MM-AES-1(b)</u>, <u>MM-AES-3(b)</u>, <u>MM-AES-4(b)</u>, <u>MM-AF-1(b)</u>, <u>MM-AF-2(b)</u>, <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-CUL-1(b)</u>, <u>MM-CUL-2(b)</u>, <u>MMCUL-3(b)</u>, <u>MM-CUL-4(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-HYD-1(b)</u>, <u>MM-USS-3(b)</u>, <u>MM-USS-4(b)</u>, and <u>MM-USS-6(b)</u>.</p> <p>The Project already substantially conforms to MM-PS-1(b) through its required compliance with existing regulatory requirements. The LAFD considers fire protection services for a project adequate if the project is within the maximum response distance for the type of land use proposed. LAMC Section 57.507.3.3 states the maximum response distances for highly intensive industrial and commercial land uses is 1 mile for an engine company and 1.5 miles for a truck company, while the maximum response distances for high-density residential and commercial neighborhood land uses such as the Project are 1.5 miles for an engine company and 2 miles for a truck company. If these distances are exceeded, all new structures would be required to install automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Code (e.g., fire signaling systems, fire extinguishers, smoker removal systems, etc.). With such systems installed, fire protection would</p>

	<ul style="list-style-type: none"> Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements. During project-level review of government facilities projects, require implementation of Mitigation Measures <u>MM-AES-1(b)</u>, <u>MM-AES-3(b)</u>, <u>MM-AES-4(b)</u>, <u>MM-AF-1(b)</u>, <u>MM-AF-2(b)</u>, <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-CUL-1(b)</u>, <u>MM-CUL-2(b)</u>, <u>MM-CUL-3(b)</u>, <u>MM-CUL-4(b)</u>, <u>MM-GEO-1(b)</u>, <u>MMGEO-1(b)</u>, <u>MM-HYD-1(b)</u>, <u>MM-USS-3(b)</u>, <u>MM-USS-4(b)</u>, and <u>MM-USS-6(b)</u> to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities. 	<p>be considered adequate even if the Project is located beyond the maximum response distance.</p> <p>The proposed Project is located approximately 0.6 mile southeast of LAFD Station 35, which is equipped with an "assessment light force" that consists of a truck company and an engine as well as a paramedic, and approximately 1.4 miles southwest of LAFD Station 56, which is equipped with an "assessment engine," which consists of an engine and a paramedic.¹⁹ The Project Site therefore meets the distance requirements of Section 57.507.3.3, even for the highly intensive land use category of industrial/commercial. However, a final determination regarding response distances would be made by the LAFD during the Project's plan check process, and if LAFD determines the Project is outside of the maximum response distance for both an engine and a truck company, the Project would be required to install automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Code.</p> <p>The Project would also be required to demonstrate compliance with Fire Code requirements as part of LAFD's hydrant and access plan check review as well as LAFD's fire and life safety plan review and inspection for new construction projects, as set forth in LAMC Section 57.118. In addition, to further ensure consistency with this mitigation measure, the following Project measures will be implemented:</p> <p>PM-PS-1: Construction contractors and work crews shall properly maintain the mechanical equipment according to best practices and the manufacturers' procedures, ensure proper storage of flammable materials, and cleanup of spills of flammable liquid.</p> <p>PM-PS-2: The Applicant shall submit an emergency response plan to Los Angeles Fire Department prior to occupancy of the Project for review and approval. The emergency response plan would include but not be limited to the following: mapping of</p>
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¹⁹ LAFD Station Directory, September 2013, available at http://www.lafdacs.org/pdf_files/FIRE%20STATION%20DIRECTORY%20Sept.%202013.pdf. See also <https://www.lafd.org/about/about-lafd/apparatus> and City of Los Angeles – Office of the City Administrative Officer, Fire Department Deployment of Resources Study, March 3, 2014, p. 30, available at http://clkrep.lacity.org/online/docs/2012/12-0600-S28_misc_03-03-14.pdf.

		<p>emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire stations. Any required modifications shall be identified and implemented prior to occupancy of the Project.</p> <p>Compliance with all State and City regulatory requirements and guidelines that address fire flow, response distance, and emergency access as well as implementation of and adherence to PM-PS-1 and PM-PS-2 will be equal to or more effective than MM-PS-1(b), which will ensure that impacts will remain less than significant, and the Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing fire stations.</p>
<p>PS-2: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public protective security services.</p>	<p>Mitigation Measures <u>MM-AES-1(b)</u>, <u>MM-AES-3(b)</u>, <u>MM-AES-4(b)</u>, <u>MM-AF-1(b)</u>, <u>MM-AF-2(b)</u>, <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-CUL-1(b)</u>, <u>MM-CUL-2(b)</u>, <u>MM-CUL-3(b)</u>, <u>MM-CUL-4(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-HYD-1(b)</u>, <u>MM-USS-3(b)</u>, <u>MM-USS-4(b)</u>, and <u>MM-USS-6(b)</u>.</p> <p><u>MM-PS-2(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the standards established in the safety elements of county and city general plans to maintain police response performance objectives, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible, including:</p> <ul style="list-style-type: none"> • Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description. 	<p>See consistency discussions above and below regarding <u>MM-AES-1(b)</u>, <u>MM-AES-3(b)</u>, <u>MM-AES-4(b)</u>, <u>MM-AF-1(b)</u>, <u>MM-AF-2(b)</u>, <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-CUL-1(b)</u>, <u>MM-CUL-2(b)</u>, <u>MM-CUL-3(b)</u>, <u>MM-CUL-4(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-HYD-1(b)</u>, <u>MM-USS-3(b)</u>, <u>MM-USS-4(b)</u>, and <u>MM-USS-6(b)</u>.</p> <p>The Project will substantially conform to this mitigation measure through incorporation of measures that comply with the City's public safety policies, as set forth in PM-PS-3, below. These measures include implementation of on-site security features, coordination with the Police Department, and incorporation of crime prevention features such as fencing of construction sites.</p> <p>PM-PS-3:</p> <ul style="list-style-type: none"> • The contractor shall provide temporary, 6-foot-high, commercial grade, chain-link construction fences to protect construction zones on the Sites. The perimeter fence shall have gates installed to facilitate the ingress and egress of equipment and the work force. The bottom of the fence, where necessary, shall have filter fabric to prevent silt run off. Straw hay bales shall be utilized around catch basins when located within the construction zone. The perimeter and silt fence shall be maintained while in place. Where applicable, the construction fence shall be incorporated with a pedestrian walkway. Temporary lighting shall be

	<ul style="list-style-type: none"> • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel. • During project-level review of government facilities projects, require implementation of Mitigation Measures <u>MM-AES-1(b)</u>, <u>MM-AES-3(b)</u>, <u>MM-AES-4(b)</u>, <u>MM-AF-1(b)</u>, <u>MM-AF-2(b)</u>, <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-CUL-1(b)</u>, <u>MM-CUL-2(b)</u>, <u>MM-CUL-3(b)</u>, <u>MM-CUL-4(b)</u>, <u>MM-GEO-1(b)</u>, <u>MMGEO-1(b)</u>, <u>MM-HYD-1(b)</u>, <u>MM-USS-3(b)</u>, <u>MM-USS-4(b)</u>, and <u>MM-USS-6(b)</u> to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities. 	<p>installed and maintained at the pedestrian walkway. Should sections of the site fence have to be removed to facilitate work in progress, barriers and or K – rail shall be utilized to isolate and protect the public from unsafe conditions.</p> <ul style="list-style-type: none"> • The Project Applicant shall provide for the deployment of a private security guard to monitor and patrol the Project Site during off hours, appropriate to the phase of construction throughout the construction period. The Project Applicant shall incorporate landscaping designs that will allow high visibility of the building on the street at the pedestrian level. • All entry and exit points would be monitored during construction. A security guard would log all workers and vehicles into and out of the Project Sites. • The Project Applicant shall incorporate landscaping designs that will allow high visibility around the buildings, and shall consult with the LAPD with respect to its landscaping plan. • The Project Applicant shall provide adequate lighting around the building in order to improve security. • The Project Applicant shall design the Project Site’s public and private recreational facilities in order to ensure a high visibility of these areas, including the provision of adequate lighting for security. • The Project Applicant shall provide the LAPD with the opportunity to review Project plans at the plan check stage of plan approval and shall incorporate any reasonable LAPD recommendations. • The Project Applicant shall provide the LAPD with a diagram of each portion of the Project Sites, showing access routes and additional access information as requested by the LAPD, to facilitate police response. • <p>Compliance with all State and City regulatory requirements and guidelines that address police protection as well as the measures under PM-PS-3 will be equal to or more effective than MM-PS-2(b), and will ensure that impacts will remain less than significant. Therefore, the Project would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing police station.</p>
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<p>PS-3: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools services.</p>	<p>Mitigation Measures <u>MM-AES-1(b)</u>, <u>MM-AES-3(b)</u>, <u>MM-AES-4(b)</u>, <u>MM-AF-1(b)</u>, <u>MM-AF-2(b)</u>, <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-CUL-1(b)</u>, <u>MM-CUL-2(b)</u>, <u>MM-CUL-3(b)</u>, <u>MM-CUL-4(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-HYD-1(b)</u>, <u>MM-USS-3(b)</u>, <u>MM-USS-4(b)</u>, and <u>MM-USS-6(b)</u>.</p> <p><u>MM-PS-3(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives that are within the jurisdiction and responsibility of school districts and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Community Facilities Act of 1982, the California Education Code, and the goals and policies established within the applicable adopted county and city general plans to ensure that the appropriate school district fees are paid in accordance with state law, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> • Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable. • During project-level review of government facilities projects, require implementation of Mitigation Measures <u>MM-AES-1(b)</u>, <u>MM-AES-3(b)</u>, <u>MM-AES-4(b)</u>, <u>MM-AF-1(b)</u>, <u>MM-AF-2(b)</u>, <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-CUL-1(b)</u>, <u>MM-CUL-2(b)</u>, <u>MM-CUL-3(b)</u>, <u>MM-CUL-4(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-HYD-1(b)</u>, <u>MM-USS-3(b)</u>, <u>MM-USS-4(b)</u>, and <u>MM-USS-6(b)</u> to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities. 	<p>See consistency discussions above and below regarding <u>MM-AES-1(b)</u>, <u>MM-AES-3(b)</u>, <u>MM-AES-4(b)</u>, <u>MM-AF-1(b)</u>, <u>MM-AF-2(b)</u>, <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-CUL-1(b)</u>, <u>MM-CUL-2(b)</u>, <u>MM-CUL-3(b)</u>, <u>MM-CUL-4(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-HYD-1(b)</u>, <u>MM-USS-3(b)</u>, <u>MM-USS-4(b)</u>, and <u>MM-USS-6(b)</u>.</p> <p>The Project already substantially conforms to this mitigation measure due to its compliance with existing regulatory requirements. Specifically, payment of required school fees to LAUSD is required by law and is considered full mitigation of all impacts to schools pursuant to Senate Bill 50 and California Government Code Section 65995. Therefore, pursuant to existing regulatory requirements the Project would be consistent with MM-PS-3(b).</p>
Recreation	Project – Level Mitigation Measures	Project Consistency/Notes

<p>REC-1: Potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</p>	<p><u>MM-REC-1(b)</u>: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures capable of avoiding or reducing significant impacts on the use of existing neighborhood and regional parks or other recreational facilities to ensure compliance with county and city general plans and the Quimby Act, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: <ul style="list-style-type: none"> ○ Increasing the accessibility to natural areas for outdoor recreation. ○ Promoting infill development and redevelopment to revitalize existing communities. ○ Utilizing “green” development techniques. ○ Promoting water-efficient land use and development. ○ Encouraging multiple uses. ○ Including trail systems and trail segments in General Plan recreation standards. • Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease 	<p>The Project already substantially conforms to this mitigation measure due to its compliance with existing regulatory requirements. Specifically, any potential impacts to City recreational facilities by Project residents would be reduced to a less than significant level through compliance with LAMC Section 12.21 G, pursuant to which the Project would include on-site open space, which would reduce demand placed on local parks and recreational facilities by Project residents. In addition, pursuant to LAMC Sections 12.33 and 21.10.3, the Project will be required to make payment of any required park fees and dwelling unit construction taxes to the City. Therefore, pursuant to existing regulatory requirements, the Project would be consistent with this mitigation measure, would not require the addition of a new park or require the alteration or addition to an existing park or open space facility, and would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</p>
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	<p>in acres of neighborhood park area available per capita in the HQT.</p> <ul style="list-style-type: none"> Where construction or expansion of recreational facilities is included in the project or required to meet public park service ratios, require implementation of Mitigation Measures <u>MM-AES-1(b)</u>, <u>MM-AES-3(b)</u>, <u>MM-AES-4(b)</u>, <u>MM-AF-1(b)</u>, <u>MM-AF-2(b)</u>, <u>MM-BIO-1(b)</u>, <u>MM-BIO-2(b)</u>, <u>MM-BIO-3(b)</u>, <u>MM-CUL-1(b)</u>, <u>MM-CUL-2(b)</u>, <u>MM-CUL-3(b)</u>, <u>MM-CUL-4(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-GEO-1(b)</u>, <u>MM-HYD-1(b)</u>, <u>MM-USS-3(b)</u>, <u>MM-USS-4(b)</u>, and <u>MM-USS-6(b)</u> to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities. 	
REC-2: Potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	See <u>MM-REC-1(b)</u> .	As described above under REC-1 , the Project would substantially conform with MM-REC-1(b) through required compliance with the City's existing regulatory requirements pertaining to parkland and recreational facilities, including payment of required park fees. Furthermore, the Project would not require the construction or expansion of recreational facilities because any potential impacts to City recreational facilities by Project residents would be minimized through compliance with LAMC Section 12.21 G, pursuant to which the Project would include on-site open space, which would reduce demand placed on local parks and recreational facilities by Project residents. Thus, the Project would be consistent with this mitigation measure.
Transportation, Traffic, and Safety	Project – Level Mitigation Measures	Project Consistency/Notes
TRA-1: Potential to conflict with the established measures of effectiveness for the performance of the circulation system, by increasing the daily VMT, taking into account all modes of transportation	<u>MM-TRA-1(b)</u> : Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant	A number of the identified mitigation measures would apply to the City or to regional transportation agencies and are therefore not relevant to the Project. Of those project-specific measures, the Project would incorporate a number of transportation-related measures as described below, and would therefore be in substantial conformance with MM-TRA-1(b).

<p>including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.</p>	<p>effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation. • Create a ride-sharing program 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. • Provide a vanpool for employees. • Fund capital improvement projects to accommodate future traffic demand in the area. • Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: <ul style="list-style-type: none"> ○ Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement. ○ Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document). ○ Signage and striping onsite to encourage bike safety. ○ Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials. ○ Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan. ○ Direct transit sales or subsidized transit passes. ○ Guaranteed ride home program. ○ Pre-tax commuter benefits (checks). ○ On-site car-sharing program (such as City Car Share, Zip Car, etc.) ○ On-site carpooling program. 	<p>The Project qualifies as a Transit Priority Project, meaning it is well served by local and regional transit, and is located within a both a High Quality Transit Area and a Transit Priority Area with access to alternative modes of transportation including public transit, bicycling, and walking. Specifically, the intersection of Sanborn Avenue/Santa Monica Boulevard/Sunset Boulevard, located approximately 0.05 mile from the Project Site, qualifies as a major transit stop because multiple bus routes with 15 minute headways or less during peak hours intersect at these points (Metro routes 2/302, 4, 302, and 704). Furthermore, the Project Site fronts Sunset Boulevard, which has been designated by SCAG as a high quality transit corridor that fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. Therefore, the Project Site satisfies the TPP CEQA exemption requirement by being less than one-quarter mile from a high quality transit corridor. Additional transit facilities are located in the general vicinity of the Project Site, including the Metro Red Line rail stations at Sunset Boulevard and Vermont Avenue and Santa Monica Boulevard and Vermont Avenue.</p> <p>In addition, there are existing bicycle facilities in the vicinity of the Project Site. A Class II bicycle lane exists along Sunset Boulevard, while Class II bicycle lanes exist along Santa Monica Boulevard east of Virgil Avenue, and a Class II bicycle lane along Virgil Avenue between Santa Monica Boulevard and Melrose Avenue was installed in 2014. A Class III bike route exists on Fountain Avenue west of Vermont Avenue. There are currently no other bicycle facilities in the Project vicinity; however, the 2010 City of Los Angeles Bicycle Plan calls for Class II bicycle lanes on Myra Avenue, Hyperion Avenue north of Fountain Avenue, Fountain Avenue west of Sunset Boulevard, and Vermont Avenue in the vicinity of the Project Site. The components of the 2010 Bicycle Plan have been incorporated into the bicycle network of the City's Mobility Plan 2035, which consists of a Low-Stress Bikeway System (comprised of the Bicycle Enhanced Network, the Neighborhood Enhanced Network, and Bicycle Paths) and a Bicycle Lane Network. The Neighborhood Enhanced Network and Bicycle Paths are relatively unchanged from the 2010 Bicycle Plan.</p>
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	<ul style="list-style-type: none"> ○ Distribution of information concerning alternative transportation options. ○ Parking spaces sold/leased separately. ○ Parking management strategies; including attendant/valet parking and shared parking spaces. <ul style="list-style-type: none"> ● Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas. ● Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible. ● Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services. ● Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work. ● Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs. ● 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. ● 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. 	<p>The mitigation measure's reference to Congestion Management Plan (CMP) consistency is no longer relevant, as the CMP was established statewide in 1990 to implement Proposition 111, tying appropriation of new gas tax revenues to congestion reduction efforts. CMP is managed at the countywide level and primarily uses an LOS performance metric, which is inconsistent with more recent state efforts to transition to VMT-based performance metrics. California Government Code Section 65088.3 allows counties to opt out of CMP requirements without penalty, if a majority of local jurisdictions representing a majority of a county's population formally adopt resolutions requesting to opt out of the program.</p> <p>On June 20, 2018, Los Angeles County Metropolitan Transportation Authority (Metro) initiated a process to gauge the interest of local jurisdictions in opting out of State CMP requirements. On July 30, 2019, the Los Angeles City Council passed a resolution to opt out of the CMP program, and on August 28, 2019, Metro announced that the thresholds had been reached and the County of Los Angeles had opted to be exempt from CMP. As such, the provisions of CMP no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, CMP analysis is no longer included in City of Los Angeles environmental documents.</p> <p>During construction, the Project would be subject to PM-TRA-1, as described below, which requires the submittal of construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. Implementation of this construction plan would reduce potential construction-related conflicts with transit, bicycle, and pedestrian traffic in the vicinity of the Project Site.</p> <p>During operation, the Project would encourage the utilization of transit due to its close proximity to the bus lines noted above, the Metro Red Line stations in the greater vicinity of the Project Site, and adjacent and nearby bicycle lanes. The redevelopment of the currently non-residential Project Site with new residential and neighborhood serving retail and restaurant uses will enhance the pedestrian environment along Sunset Boulevard and encourage additional foot traffic along this corridor. The</p>
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	<ul style="list-style-type: none"> • Purchase, or create incentives for purchasing, low or zero-emission vehicles. • Create local “light vehicle” networks, such as neighborhood electric vehicle systems. • Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles. • Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles. • Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives. • Project Selection: <ul style="list-style-type: none"> ○ Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. ○ Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints. • Public Involvement: <ul style="list-style-type: none"> ○ Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community members and other stakeholders, especially to those traditionally underserved by transportation services. • Transit and Multimodal Impact Fees: <ul style="list-style-type: none"> ○ Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations. ○ Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions. • System Monitoring: <ul style="list-style-type: none"> ○ Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency. • Arterial Traffic Management: 	<p>Project would also include bicycle parking for its residents and patrons of its commercial uses, further facilitating non-vehicular forms of travel to and from the Project Site. In addition, the Project would incorporate a variety of TDM measures as well as infrastructure improvements, as described under PM-TRA-2 and PM-TRA-3, which would encourage the use of active transportation and transit and assist in reducing automobile trips in the area. Furthermore, consistent with Mitigation Measure TRA-1(b)’s recommendation to implement traffic and roadway management strategies to improve mobility and efficiency and to review and expand signal timing programs, the Project would install a new traffic signal and implement complimentary phasing and timing improvements pursuant to PM-TRA-4.</p> <p>PM-TRA-1: Prior to the issuance of a demolition, grading or building permit, a detailed Construction Traffic Management Plan, including street closure information, detour plans, haul routes, and staging plans, will be prepared and submitted to the City for review and approval. The Construction Traffic Management Plan will formalize how construction would be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The Construction Traffic Management Plan shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and will include, but not be limited to, the following elements as appropriate:</p> <ul style="list-style-type: none"> • Providing for temporary traffic control during all construction activities adjacent to public right-of-way to improve traffic flow on public roadways (e.g., flag men); • Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets; • Prohibiting hauling during peak hours; • Rerouting construction trucks to reduce travel on congested streets; • Prohibiting construction-related vehicles from parking on surrounding public streets; • Providing safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers; • Accommodating all equipment on-site;
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	<ul style="list-style-type: none"> ○ Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. • Signal Synchronization: <ul style="list-style-type: none"> ○ Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic. • HOV Lanes: <ul style="list-style-type: none"> ○ Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions. • Delivery Schedules: <ul style="list-style-type: none"> ○ Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas. ○ Implement and supporting trip reduction programs. ○ Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives. • Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities. • Bicycle and Pedestrian Trails: <ul style="list-style-type: none"> ○ Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations. • Bicycle Safety Program: <ul style="list-style-type: none"> ○ Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers. • Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects. • Bicycle Parking: 	<ul style="list-style-type: none"> • Scheduling of construction-related deliveries to reduce travel during commuter peak hours; and • Obtaining the required permits for truck haul routes from the City prior to issuance of any permit for the Project. <p>PM-TRA-2: The Project will prepare a Transportation Demand Management (TDM) plan, which will be submitted to LADOT for approval. A preliminary TDM plan will be prepared and provided for DOT review prior to the issuance of the first building permit for the Project, and a Final TDM Plan approved by DOT will be completed prior to the issuance of the certificate of occupancy for the Project. The TDM plan would include, but may not be limited to, the following TDM measures to encourage the use of active transportation and transit and assist in reducing automobile trips in the area:</p> <ul style="list-style-type: none"> • Provide bulletin boards with transit and rideshare information. • Provide information about transit options to all new tenants and employees. • Offer one-month subsidized transit pass for new employees and new tenants with move-in package. • Provide bike repair station for tenants and employees. • Provide bicycle parking. • Provide signage on building showing the number of available public parking spaces. • Provide car-share parking spaces, if requested by a car-share operator. • Install concrete bus pad on Manzanita Street for new Route 4/704 bus stop, if desired by Metro. • Stripe a westbound bike lane on Manzanita Street in front of Project Site, in coordination with City. • Provide a designated parking area for employee carpools and vanpools with spaces striped to meet the employee demand and clearly identify the carpool/vanpool parking area at the driveway. • Provide clearly identified parking spaces in the carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces.
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	<ul style="list-style-type: none"> ○ Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists). ● Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following: <ul style="list-style-type: none"> ○ Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation; ○ Eliminate or reduce minimum parking requirements for new buildings; ○ “Unbundle” parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space); ○ Use parking pricing to discourage private vehicle use, especially at peak times; ○ Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities; ○ Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times; ○ Encourage shared parking programs in mixed-use and transit-oriented development areas. ● Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: <ul style="list-style-type: none"> ○ Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking; ○ Encourage special event center operators to advertise and offer discounted transit passes with event tickets; ○ Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking; 	<ul style="list-style-type: none"> ● Provide information on the bulletin boards about the availability of preferential carpool/vanpool spaces and a description of the method for obtaining permission to use such spaces. ● Provide a minimum clearance of 7 feet 2 inches for all parking spaces and access ways used by vanpool vehicles within the parking structure. ● Commercial uses within the Project Site are urged to promote teleconferencing, telecommuting, flexible work hour programs to reduce unnecessary employee transportation, guaranteed ride homes, and to promote and adopt a vanpooling program for employees. ● The Project’s parking spaces shall be rented/leased separately from the Project’s residential dwelling units. ● The Project Applicant would contribute a one-time fixed fee of \$50,000 to be deposited into the City’s Bike Plan Trust Fund to support bicycle improvements within the areas of the Project. <p>PM-TRA-3: The Project proposes to include the following frontage improvements:</p> <ul style="list-style-type: none"> ● Repair the collapsed pavement on Manzanita Street in front of the Project Site; ● Install a sidewalk on the north side of Manzanita Street where the pavement has collapsed. <p>PM-TRA-4: The Project will implement the following signal and timing improvements:</p> <ul style="list-style-type: none"> ● Install a traffic signal at Manzanita Street and Sunset Boulevard, including bicycle detection, subject to review and evaluation by LADOT. ● Install left-turn phasing for westbound Sunset Boulevard at Manzanita Street. ● Implement corresponding signal modifications and signal timing changes at Sanborn Avenue/Santa Monica Boulevard/Sunset Boulevard. <p>Thus, through the Project’s conformance with the transit-oriented policies of regional and local plans as well as incorporation of PM-TRA-1 through PM-TRA-4, construction and operation of the Project would not result in a significant impact</p>
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	<ul style="list-style-type: none"> ○ Promote the use of bicycles by providing space for the operation of valet bicycle parking service. • Parking “Cash-out” Program: <ul style="list-style-type: none"> ○ Require new office developments with more than 50 employees to offer a Parking “Cash-out” Program to discourage private vehicle use. • Pedestrian and Bicycle Promotion: <ul style="list-style-type: none"> ○ Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation. • Fleet Replacement: <ul style="list-style-type: none"> ○ Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models. 	to the performance of the circulation system, and the Project would be consistent with this mitigation measure.
<p>TRA-2: Potential to conflict with an applicable congestion management program, including, but not limited to, VMT and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways.</p>	<p><u>MM-TRA-2(b)</u>. Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions:</p> <ul style="list-style-type: none"> • Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: 	<p>As discussed under TRA-1, above, a number of the identified mitigation measures would pertain to the City or a regional transportation agency, and are therefore not relevant to the Project. Of the potential project-level mitigation, the Project already substantially conforms with the identified measures, as it is a Transit Priority Project, meaning it is within one-half mile of a major transit stop and well served by local and regional transit. The Project Site is also located within a TPA with access to alternative modes of transportation, including public transit, bicycling, and walking. Specifically, as a mixed-use development in an urban area, the proposed Project is expected to have a higher percentage of internal and pass-by trips. Furthermore, because of its proximity to public transit as well as employment and entertainment destinations, in addition to its provision of bicycle parking spaces, a number of Project trips would be expected to be walk, bike, or transit trips rather than auto vehicle trips. Similarly, because the commercial components of the Project will be primarily locally serving to the Project and the surrounding area, some of the trips might be expected to be walk-ins either from the Project or the surrounding area.</p> <p>Pursuant to CEQA Guidelines Section 15064.3(b)(1), development projects within one-half mile of a major transit stop shall generally be presumed to have a less than significant</p>

	<ul style="list-style-type: none"> ○ Advocate for a regional, market-based system to price or charge for auto trips during peak hours. ○ Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation. ○ Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology. ○ Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation. ○ Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay. ● Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency: <ul style="list-style-type: none"> ○ A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes. ○ Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur. ○ Location of construction staging areas for materials, equipment, and vehicles at an approved location. ○ A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine 	<p>impact pertaining to vehicle miles traveled (VMT). Notwithstanding this presumption, the Project will also directly encourage the utilization of transit due to its close proximity to a major transit stop consisting of the intersection of existing bus lines (Metro 2/302, 4, and 704) at the intersection of Sanborn Avenue/Santa Monica Boulevard/Sunset Boulevard, proximity to the Metro Red Line stations at Sunset/Vermont and Sunset/Santa Monica in the general vicinity of the Project Site, and bicycle lanes on both Sunset Boulevard and Santa Monica Boulevard.</p> <p>In addition, as discussed above, pursuant to PM-TRA-2 and PM-TRA-3, the Project will incorporate numerous TDM measures and implement various infrastructure improvements to enhance transit services as well as non-vehicular travel in the vicinity of the Project. In addition, pursuant to PM-TRA-1, the Project will implement a detailed Construction Traffic Management Plan to reduce potential congestion and conflicts during the construction phase of the Project, and pursuant to PM-TRA-4, the Project will facilitate additional coordination of controlled intersections through implementation of signal infrastructure and timing so that traffic passes more efficiently through the area.</p> <p>Furthermore, given the Project's transit-oriented nature as well as the fact that it is located more than a mile from either the 101 or 2 freeways, there are a low number of Project trips anticipated to utilize existing highways. In addition, as discussed under TRA-1, the provisions of the CMP program no longer apply to any of the 89 local jurisdictions in Los Angeles County. Accordingly, the Project will be consistent with this mitigation measure.</p>
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	<p>the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit.</p> <ul style="list-style-type: none">○ Provision for accommodation of pedestrian flow.○ As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces.○ Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense., within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, r Repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy.○ Any heavy equipment brought to the construction site shall be transported by truck, where feasible.○ No materials or equipment shall be stored on the traveled roadway at any time.○ Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion.○ All equipment shall be equipped with mufflers.○ Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors.○ Promote "least polluting" ways to connect people and goods to their destinations.● Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency:<ul style="list-style-type: none">○ Ensure transportation centers are multi-modal to allow transportation modes to intersect.	
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	<ul style="list-style-type: none">○ Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail.○ To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges.○ Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations.○ Coordinate schedules and routes across service lines with neighboring transit authorities.○ Support programs to provide “station cars” for short trips to and from transit nodes (e.g., neighborhood electric vehicles).○ Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so.○ Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles.○ Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets.○ Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible.● Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including:<ul style="list-style-type: none">○ Ensure transit stops and bus lanes are safe, convenient, clean and efficient.○ Ensure transit stops have clearly marked street-level designation, and are accessible.○ Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate.○ Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one half mile.	
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	<ul style="list-style-type: none">• Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including:<ul style="list-style-type: none">○ Develop a Regional Pass system to reduce the number of different passes and tickets required of system users.○ Implement “Smart Bus” technology, using GPS and electronic displays at transit stops to provide customers with “real-time” arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service).○ Investigate the feasibility of an on-line trip-planning program.• Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including:<ul style="list-style-type: none">○ Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic.○ Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access.• Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including:<ul style="list-style-type: none">○ Designate a certain percentage of parking spaces for ride-sharing vehicles.○ Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles.○ Provide a web site or message board for coordinating shared rides.○ Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit.○ Hire or designate a rideshare coordinator to develop and implement ridesharing programs.• Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including:<ul style="list-style-type: none">○ Provide assistance to regional and local ridesharing organizations.○ Advocate for legislation to maintain and expand incentives for employer ridesharing programs.○ Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes.	
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	<ul style="list-style-type: none">○ Provide public recognition of effective programs through awards, top ten lists, and other mechanisms.● Implement a “guaranteed ride home” program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program.● Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations.● Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers.● Work with existing shuttle service providers to coordinate their services.● Facilitate employment opportunities that minimize the need for private vehicle trips, including:<ul style="list-style-type: none">○ Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations.○ Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate.● Enforce state idling laws for commercial vehicles, including delivery and construction vehicles.● Organize events and workshops to promote GHG-reducing activities.● Implement a Parking Management Program to discourage private vehicle use, including:<ul style="list-style-type: none">○ Encouraging carpools and vanpools with preferential parking and a reduced parking fee.○ Institute a parking cash-out program.○ Renegotiate employee contracts, where possible, to eliminate parking subsidies.○ Install on-street parking meters with fee structures designed to discourage private vehicle use.○ Establish a parking fee for all single-occupant vehicles.● Work with school districts to improve pedestrian and bicycle to schools and restore school bus service.● Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities.	
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	<ul style="list-style-type: none"> • Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency. • Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers. • Synchronize traffic signals to reduce congestion and air quality. • Work with community groups and business associations to organize and publicize walking tours and bicycle events. • Support legislative efforts to increase funding for local street repair. 	
TRA-3: Potential to result in a significant change in air traffic patterns, including either an increase in air traffic levels or a change in location that results in substantial safety risks.	No mitigation required.	No mitigation applies.
TRA-4: Potential to substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections), increased volumes or incompatible uses (e.g., farm equipment).	No mitigation required.	No mitigation applies.
TRA-5: Potential to result in inadequate emergency access.	<u>MM-TRA-5(b)</u> : Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider improving emergency access and ensuring compliance with the provisions of the county and city general plan, Emergency Evacuation Plan, and other regional and local plans establishing access during emergencies, as applicable and feasible. Compliance can be achieved through adopting	The Project would be in substantial conformance with this mitigation measure. The identified measures under MM-TRA-5(b) would primarily pertain to the City or a regional transportation or emergency management agency, and are therefore not applicable to the Project. Notwithstanding, the Project substantially conforms to those measures that could be applicable to a private development project, as the Project would implement PM-TRA-1 as described above, which requires the preparation and City approval of a Construction Traffic Management Plan, which would be implemented during Project construction to reduce and avoid potential impacts regarding

	<p>transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: <ul style="list-style-type: none"> ○ Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. ○ Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. ○ Scheduling of truck trips outside of peak morning and evening commute hours. ○ Limiting of lane closures during peak hours to the extent possible. ○ Usage of haul routes minimizing truck traffic on local roadways to the extent possible. ○ Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. ○ Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. ○ Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. ○ Storage of construction materials only in designated areas. 	<p>emergency access. In addition, as described under PM-PS-2 and PM-PS-3, the Project will undergo review by the Los Angeles Fire Department and the Los Angeles Police Department regarding site access and emergency response. Through implementation of these measures, the Project will be consistent with MM-TRA-5(b).</p>
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	<ul style="list-style-type: none"> ○ Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. ● Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. ● Enhance emergency preparedness awareness among public agencies and with the public at large. ● Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: <ul style="list-style-type: none"> ○ Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities. ○ Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format. ○ Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function. 	
TRA-6: Potential to result in conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	No mitigation required.	No mitigation applies.
Utilities and Service Systems	Project – Level Mitigation Measures	Project Consistency/Notes
USS-1: Potential to exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	No mitigation required.	No mitigation applies.

<p>USS-2: Potential to require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</p>	<p>No mitigation required.</p>	<p>No mitigation applies.</p>
<p>USS-3: Require or result in construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</p>	<p>MM-USS-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on utilities and service systems, particularly for construction of storm water drainage facilities including new transportation and land use projects that are within the responsibility of local jurisdictions including the Riverside, San Bernardino, Los Angeles, Ventura, and Orange Counties Flood Control District, and County of Imperial. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures, as applicable and feasible. These mitigation measures are within the responsibility of the Lead Agencies and Regional Water Quality Control Boards of (Regions 4, 6, 8, and 9) pursuant to the provisions of the National Flood Insurance Act, stormwater permitting requirements for stormwater discharges for new constructions, the flood control act, and Urban Waste Management Plan.</p> <p>Such mitigation measures, or other comparable measures, capable of avoiding or reducing significant impacts on the use of existing storm water drainage facilities and can and should be adopted where Lead Agencies identify significant impacts on new storm water drainage facilities.</p> <p>See MM-HYD-5(b).</p>	<p>As described above under HYD-1, the Project already substantially conforms to this mitigation measure because the Project would adhere to all applicable controls imposed via existing City and State regulations, including compliance with the LID Ordinance and SUSMP regulations. Runoff from the Project Site would be either directed in non-erosive drainage devices to landscaped areas for evaporation and/or directed to the existing City storm drain system, captured in on-site below grade cisterns, and/or directed to the existing City storm drain system. Therefore, through compliance with these existing regulatory requirements, the Project would not result in a significant increase in site runoff or significant changes in local drainage patterns, would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems, and would not require or result in construction of new storm water drainage facilities or expansion of existing facilities.</p>
<p>USS-4: Have sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements.</p>	<p>MM-USS-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with EO B-29-15, provisions of the Porter –Cologne Water Quality Control Act, California Domestic Water Supply Permit requirements, and applicable County, City or other Local</p>	<p>The Project already substantially conforms to this mitigation measure through compliance with existing regulations as well as consistency with current regional population projections.</p> <p>Specifically, as described above under PHE-1, the addition of 221 residents represents a 0.0057 percent increase in resident population estimates for the City in 2012, 0.0053 percent increase of the estimated population in 2024 (the Project's anticipated buildout year), and 0.0048 percent of the estimated</p>

	<p>provisions. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. • Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. • Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. • Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. 	<p>population in the City by 2040.^{20,21} This increase would not be considered a substantial increase in population for the area and is within the anticipated SCAG forecast for population.</p> <p>These 91 residential units would represent a 0.0068 percent increase in the overall estimated housing units for the City in 2012, 0.0048 percent of the estimated housing units in 2024, and 0.0054 percent of the estimated housing units for the City by 2040.²² This increase would not be considered a substantial increase in housing for the area as the addition of 91 new multi-family residential units is within the anticipated housing increases based on SCAG projections for housing.</p> <p>Due to its consistency with these regional and local plans and policies, the Project would not induce significant growth or accelerate development in an undeveloped area that exceeds projected/planned levels. Moreover, the Los Angeles Department of Water and Power (LADWP) prepares an Urban Water Management Plan (UWMP) for City adoption every five years. The 2015 UWMP prepared and adopted by the City in 2015, is based on SCAG population projections, and determined that sufficient water supplies exist to serve the City through 2040.²³ Therefore, since the Project would be consistent with SCAG projections for population and housing, the Project would be accounted for in the UWMP's water demand estimates.</p> <p>In addition, to ensure that water demand is reduced to the extent feasible, the Project would be required to comply with City Ordinance No. 170,978 (Landscape Ordinance), which</p>
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²⁰ The latest Citywide average household size is 2.42 residents per housing unit, based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017), www.census.gov/programs-surveys/acs/technical-documentation/table-and-geography-changes/2015/5-year.html, per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, July 31, 2019.

2.42 persons/housing unit x 91 units = 221 residents

²¹ Population Year 2012: (221 residents/3,845,500 total City of LA residents) x 100 = 0.0057 %
Population Year 2024: (221 residents/4,172,886 total projected City of LA residents) x 100 = 0.0053 %
Population Year 2040: (221 residents/4,609,400 total projected City of LA residents) x 100 = 0.0048 %

²² Housing Year 2012: (91 units/1,325,500 total City of LA units) x 100 = 0.0068 %

Housing Year 2024: (91 units/1,481,843 total projected City of LA units) x 100 = 0.0061 %

Housing Year 2040: (91 units/1,690,300 total projected City of LA units) x 100 = 0.0054 %

²³ City of Los Angeles, Department of Water and Power, 2015 Urban Water Management Plan. June 2016.

	<ul style="list-style-type: none"> Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface. 	<p>imposes numerous water conservation measures in landscaping, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).</p> <p>Moreover, as described under EN-2, as a TPP project seeking a CEQA exemption pursuant to SB 743, the Project would be required to design building and landscaping to achieve 25 percent less water usage than the average household in the region as part of the CEQA exemption process. As demonstrated in the energy and water efficiency report prepared for the Project (Attachment E), the Project's water use would be 56.9 percent below the regional baseline, which would be achieved through multiple measures including high efficiency water-using appliances such as clothes washers and dishwashers, low flow fixtures and faucets, and efficient irrigation systems in compliance with the Los Angeles Green Building Code.</p> <p>Thus, it is reasonably anticipated that the Project would not create any water system capacity issues, and sufficient reliable water supplies would be available to meet Project demands. To further ensure consistency with State, regional, and local water conservation regulations as well as MM-USS-4(b), the following water reduction efforts identified under PM-USS-1 and PM-USS-2 would also be implemented.</p> <ul style="list-style-type: none"> PM-USS-1: The Project shall implement all applicable mandatory measures within the Los Angeles Green Building Code that would have the effect of reducing the Project's water use. Water demand will be further reduced through incorporation of the following: <ul style="list-style-type: none"> High-efficiency toilets (maximum 1.28 gallons per flush), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gallons per flush), including no-flush or waterless urinals, in all restrooms as appropriate. Restroom faucets with a maximum flow rate of 1.5 gallons per minute and self-closing design.
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		<ul style="list-style-type: none">• High-efficiency Energy Star-rated dishwashers, if provided.• Prohibiting the use of single-pass cooling equipment (single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system).• Demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwellings.• No more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.• High-efficiency clothes washers (water factor of 6.0 or less), if provided in either individual units and/or in a common laundry room(s).○ PM-USS-2: The Project shall comply with Ordinance No. 170,978 (Landscape Ordinance). Water demand will be further reduced through incorporation of the following:<ul style="list-style-type: none">• Weather-based irrigation controller with rain shutoff.• Matched precipitation (flow) rates for sprinkler heads.• Drip/microspray/subsurface irrigation where appropriate.• Minimum irrigation system distribution uniformity of 75 percent.• Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials.• Use of landscape contouring to minimize precipitation runoff.• A separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater. <p>Through regulatory compliance and the implementation of the above Project measures, the Project will be consistent with this mitigation measure.</p>
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<p>USS-5: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's commitments.</p>	<p>No mitigation required.</p>	<p>No mitigation applies. Notwithstanding, as described in the Utilities Report prepared for the Project (Attachment N), a Sewer Capacity Availability Review (SCAR) that identifies the Project's estimated total flow was submitted to LASAN to verify capacity availability. Based on the approved SCAR, LASAN has confirmed that there is sufficient capacity to service the Project. As further described in the Utility Report, wastewater generated by the Project will be treated at the City's Hyperion Wastewater Treatment Plan, which has excess capacity to not only accommodate the Project's estimated total flow but also accommodate the projected population growth within the City. In addition, the City constantly plans for necessary capacity increases at Hyperion to accommodate projected wastewater generation based on population growth forecasts. As described in the Utilities Report, for the next planning horizon, the City has developed the One Water Los Angeles 2040 Plan. As it relates to wastewater, the One Water LA 2040 Plan includes a Wastewater Facilities Plan, which would guide LASAN decisions on implementing system improvements to its wastewater collection and treatment facilities. The One Water LA 2040 Plan concludes that based on the design capacities and the projected future flows of each water reclamation plant within the City through year 2040, all existing water reclamation plants would have sufficient capacity to manage projected wastewater flows.²⁴In addition, pursuant to LAMC Section 64.15, the City will require sewer gauging and approval of a Sewer Capacity Availability Request before issuing permits for the Project, to ensure adequate infrastructure capacity</p>
<p>USS-6: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.</p>	<p><u>MM-USS-6(b):</u> Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project that has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance pursuant to the provisions of the Solid Waste Diversion Goals and Integrated Waste Management Plan, as</p>	<p>The Project already substantially conforms to this mitigation measure through compliance with existing regulations. Specifically, at the State level, the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) seeks to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000. Pursuant to AB 939, each County is required to prepare and administer a Countywide Integrated Waste Management Plan (ColWMP), pursuant to which landfill</p>

²⁴ One Water LA 2040 Plan, Volume 2: Wastewater Facilities Plan, p. ES-1, April 2018.

	<p>applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: <ul style="list-style-type: none"> ○ Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. ○ Inclusion of a waste management plan that promotes maximum C&D diversion. ○ Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). ○ Reuse of existing structure and shell in renovation projects. ○ Design for deconstruction without compromising safety. ○ Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components. ○ Development of indoor recycling program and space. ○ Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. ○ Locally generated waste should be disposed of regionally, considering distance to disposal site. Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required. 	<p>disposal needs and capacity are continually evaluated as part of the preparation of the ColWMP Annual Report that examines future landfill disposal needs over the next 15-year planning horizon. The most recent ColWMP 2018 Annual Report for Los Angeles County states that no solid waste disposal capacity shortfall is anticipated within the next 15 years (i.e., until 2033) under current conditions.²⁵</p> <p>The City's Solid Waste Management Policy Plan (CiSWMPP) is a long-range policy plan adopted in 1993 to provide direction for the solid waste management. The objective of the CiSWMPP is to promote source reduction or recycling for a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter, and 70 percent of the waste by 2020. The Plan's goal has also been surpassed by the City, which achieved a diversion rate of 76.4 percent in 2012.²⁶ The City has also adopted the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA), which has the primary objective of achieving a zero waste goal through reducing, reusing, recycling, or converting the resources currently going to disposal. The Project would be required to reduce the total estimated waste output through these established City recycling programs, and would also be subject to the City's Recycling Space Allocation Ordinance (Ordinance No. 171,687), which establishes requirements for the inclusion of recycling areas or rooms within development projects.</p> <p>In addition, in compliance with existing City of Los Angeles standards and regulations, the Project would be required to recycle construction and demolition (C&D) waste to the maximum extent possible pursuant to Ordinance No. 181,519 (Citywide Construction and Demolition Waste Recycling Ordinance) that requires all mixed C&D waste generated within City limits to be taken to City-certified C&D waste processors. During construction, temporary waste separation bins would be provided onsite and would be disposed of properly as a part of the Project's regular solid waste disposal program. Compliance with these regulations would ensure that construction waste is</p>
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²⁵ County of Los Angeles Department of Public Works, ColWMP 2018 Annual Report, December 2019, p. 37.

²⁶ LASAN, Recycling, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=auguwlldg_5&_afLoop=10870014375826670#!, accessed May 27, 2020.

	<ul style="list-style-type: none"> ○ Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target. ○ Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. ○ Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. ○ Develop alternative waste management strategies such as composting, recycling, and conversion technologies. ○ Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. ○ Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). ○ Integrate reuse and recycling into residential industrial, institutional and commercial projects. ○ Provide recycling opportunities for residents, the public, and tenant businesses. ○ Provide education and publicity about reducing waste and available recycling services. ○ Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates. ○ Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services. 	<p>recycled and disposed of properly. Overall, compliance with existing regulations would ensure that the Project's waste disposal needs are reduced and can be sufficiently met by local landfills, thereby achieving consistency with this mitigation measure.</p>
<p>USS-7: Potential to comply with federal, state, and local statutes and regulations related to solid waste.</p>	<p>No mitigation required.</p>	<p>No mitigation applies.</p>