

### III. TRANSIT PRIORITY PROJECTS CONSISTENCY ANALYSIS

I. SUSTAINABLE COMMUNITIES STRATEGY		
	Yes	No
The project is consistent with the general land use designation, density, building intensity, and applicable policies specified for the project areas in SCAG's adopted Sustainable Communities Strategy.	X	
II. TRANSIT PRIORITY PROJECT		
<i>To be considered a Transit Priority Project (TPP) as defined by PRC Section 21155(b), the project must meet all of the following criteria.</i>		
	Yes	No
Based on total building square footage, the project contains at least 50 percent residential use.	X	
AND, if the project contains between 26 percent and 50 percent non-residential uses, the Floor Area Ratio (FAR) is greater than 0.75.	n/a	
The project includes a minimum net density of at least 20 dwelling units per acre.	X	
The project site is located within one-half mile of either the following which have been included in the SCAG Regional Transportation Plan: (a) a major transit stop that contains an existing rail station, a ferry terminal served by transit, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during peak commute periods; or (b) a high quality transit corridor that has fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.	X	

#### 1. SENATE BILL 375

The State of California adopted Senate Bill (SB) 37, the Sustainable Communities and Climate Protection Act of 2008, to outline growth strategies and better integrate regional land use and transportation planning which will help the State meet its greenhouse gas reduction mandates. SB 375 requires that State's 18 metropolitan planning organizations to incorporate a "sustainable communities strategy" with the regional transportation plans to achieve their respective region's greenhouse gas emission reduction targets set by the California Air Resources Board (CARB). The Southern California Association of Governments (SCAG) is the metropolitan planning organization that has jurisdiction over the Project site.

SCAG adopted the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS) on April 7, 2016. For the SCAG region, CARB has set greenhouse gas reduction

targets to eight percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035. The 2016 RTP/SCS outlines strategies to meet or exceed the targets set by ARB.<sup>1</sup>

## 2. TRANSIT PRIORITY PROJECT CRITERIA

SB 375 provides CEQA streamlining benefits to transit priority projects (TPPs). A TPP is a project that meets the following four criteria (See Public Resources Code Section (PRC §) 21155 (a) and (b)):

1. Be consistent with the use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the CARB has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented achieve the greenhouse gas emission reduction targets established by CARB;
2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent of the 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provide a minimum net density of at least 20 units per acre; and
4. Be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

### *Consistency with Criterion #1*

On April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016-2040 RTP/SCS balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals. On June 28, 2016, ARB accepted SCAG's quantification of GHG emission reductions from the 2016-2040 RTP/SCS and determined that the 2016-2040 RTP/SCS

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<sup>1</sup> Southern California Association of Governments, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, Introduction, April 19, 2012.

would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by ARB.<sup>2</sup>

### **Use Designation, Density, and Building Intensity**

The Project Site area is located within an Urban Land Development Category. The 2016-2040 RTP/SCS describes the Urban Land Development Category as:

*These areas are often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.<sup>3</sup>*

The Proposed Project would be consistent with the Urban Land Use Development Category. The Proposed Project is located within a highly urbanized area within the City of Los Angeles, within the Hollywood Community Plan Area. The Proposed Project is an infill multi-family residential project that would provide 68 net new housing units. The Proposed Project is located within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area (TPA) as defined by SB 743, which supports transit opportunities and promotes a walkable environment. Additionally, access to the Project Site is served by a well-connected street network, which consists of a grid pattern as is most of the City of Los Angeles. As such, the Proposed Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle.

The 2016-2040 RTP/SCS further demonstrates that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Proposed Project is an affordable senior housing project, which includes 68 units. The Proposed Project promotes pedestrian activity and

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<sup>2</sup> ARB Executive Order No. 16-066

<sup>3</sup> Southern California Association of Governments, *Final 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy*, Adopted April 2016, Chapter 2, 'Where We Are Today', [http://scagrtpsc.net/Documents/2016/final/f2016RTPSCS\\_02\\_WhereWeAreToday.pdf](http://scagrtpsc.net/Documents/2016/final/f2016RTPSCS_02_WhereWeAreToday.pdf), page 20, accessed January 8, 2018.

bicycling activity by providing landscaping along the public right-of-way, outdoor courtyard area, and outdoor green space and walking paths.

The Proposed Project would restrict 67 out of its proposed 68 units as senior citizen, Very Low Income units. The Proposed Project would provide parking that is consistent with LAMC standards. Therefore, the Proposed Project is similar to other developments within HQTAs.

The RTP/SCS includes various urban footprint place types, including mixed use, residential, commercial, office, research and development, industrial, civic and open space.<sup>4</sup> The Proposed Project is consistent with the 'Urban Residential' place type within the urban land development category:

*"The most intense residential-focused type, Urban Residential areas are typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs."*

The land use mix for this place type is typically approximately 64 percent residential, 4 percent employment, 12 percent mixed use, and 21 percent open space/civic. The residential mix is 100 percent multifamily. The average total net Floor Area Ratio (FAR) is 9.0, floors range from 5-60 feet, and the gross density ranges from 0-50+ employees per acre and 75-500+ households per acre.<sup>5</sup>

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<sup>4</sup> Southern California Association of Governments, 2016-2040 RTP/SCS Background Documentation, 'Place Types Categorized Into Land Development Categories (LDCs); SCAG 2016-2040 RTP/SCS, Urban Footprint Place Types, [http://scagrtpscsc.net/Documents/2016/draft/d2016RTPSCS\\_SCSBackgroundDocumentation.pdf](http://scagrtpscsc.net/Documents/2016/draft/d2016RTPSCS_SCSBackgroundDocumentation.pdf), accessed January 8, 2018.

<sup>5</sup> Southern California Association of Governments, 2016-2040 RTP/SCS Urban Footprint Place Types Summary, page 1, [http://scagrtpscsc.net/documents/2016/supplemental/UrbanFootprint\\_PlaceTypesSummary.pdf](http://scagrtpscsc.net/documents/2016/supplemental/UrbanFootprint_PlaceTypesSummary.pdf), accessed January 8, 2018.

**Table III-1**  
**SCAG Population and Housing Projections for the**  
**City of Los Angeles, Los Angeles County, and the SCAG Region**

<b>Population</b>			
<b>Region</b>	<b>2012</b>	<b>2040</b>	<b>% Growth (2012-2040)</b>
Los Angeles City	3,845,500	4,609,400	20
Los Angeles County	9,923,000	11,514,000	16
SCAG Region	18,322,000	22,138,000	21
<b>Households</b>			
<b>Region</b>	<b>2012</b>	<b>2040</b>	<b>% Growth (2012-2040)</b>
Los Angeles City	1,325,500	1,690,300	28
Los Angeles County	3,257,000	3,946,000	21
SCAG Region	5,885,000	7,412,000	26
<b>Employment</b>			
<b>Region</b>	<b>2012</b>	<b>2040</b>	<b>% Growth (2012-2040)</b>
Los Angeles City	1,696,400	2,169,100	28
Los Angeles County	4,246,000	5,226,000	23
SCAG Region	7,440,000	9,872,000	33
Source: SCAG, adopted 2016-2040 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.			

Based on the Hollywood Community Plan Area's current household (e.g., an average of 2.74 persons per multi-family household for the Hollywood Community Plan area), the construction of 68 new multi-family residential dwelling units<sup>6</sup> would result in a potential increase of approximately 186 net new residents in the City of Los Angeles. The proposed increase in housing units and population would be consistent with SCAG's forecast of 364,800 additional households and approximately 763,900 persons in the City of Los Angeles between 2012 and 2040.

<sup>6</sup> There would be a total of 67 new senior housing units and one unit set aside for an on-site manager. Thus the number of potential new residents presented is a worst-case scenario, given that the senior housing units will in all likelihood be occupied by a maximum of two persons, and in many cases by a sole occupant. Census statistics show that average household size decreases with age, especially after age 45, and is below two persons per household for households over age 65. National Association of Home Builders 50+ Housing Council, *Approving 55+ Housing: Facts That Matter*, <https://www.winchester.us/DocumentCenter/View/1182>, accessed October 16, 2017.

### Applicable Policies Specified for the Project Area

The Proposed Project is consistent with SCAG's growth projections for the City of Los Angeles, which supports the conclusion that the Proposed Project is consistent with SCAG policies. Refer to Section V, Sustainable Communities Environmental Assessment, Section 13, Population and Housing, for a discussion on the Proposed Project's consistency with SCAG's population and housing growth. The Proposed Project would be consistent with applicable goals and policies presented within SCAG's 2016-2040 RTP/SCS. Refer to Table III-2 below for the Proposed Project's consistency analysis.

**Table III-2**  
**Consistency Analysis with the**  
**2016-2040 Regional Transportation Plan / Sustainable Community Strategy**

<b>Goals and Policies</b>	<b>Consistency Assessment</b>
<b>2016-2040 RTP/SCS Goal 1:</b> Align the plan investments and policies with improving regional economic development and competitiveness.	<b>Not Applicable.</b> This Goal is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project.
<b>2016-2040 RTP/SCS Goal 2:</b> Maximize mobility and accessibility for all people and goods in the region.	<b>Consistent.</b> The Project Site is located in a highly urbanized area in the City of Los Angeles within a High Quality Transit Area (HQT <sup>7</sup> ) and a Transit Priority Area (TPA). The Proposed Project would develop 67 affordable units for seniors, one (1) market-rate unit for an on-site manager, 32 studio units, and 36 one-bedroom units. The Project Site is located less than one-half mile from the intersection of two major bus lines, 217 and 780 Metro, with frequency of service intervals of 20 minutes or less during peak commute periods. The Project Site is also located less than one-half mile of the Metro Red Line Hollywood/Highland station. The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.

<sup>7</sup> As defined by SCAG, a High Quality Transit Area features frequent transit service and/or major transit stations. [http://scagrtpscs.net/SiteAssets/ExecutiveSummary/assets/resources/Exhibit5-1\\_HighQualityTransitAreaInTheSCAGregionFor2040Plan.pdf](http://scagrtpscs.net/SiteAssets/ExecutiveSummary/assets/resources/Exhibit5-1_HighQualityTransitAreaInTheSCAGregionFor2040Plan.pdf), accessed September 12, 2018

Goals and Policies	Consistency Assessment
<b>2016-2040 RTP/SCS Goal 3:</b> Ensure travel safety and reliability for all people and goods in the region.	<b>Not Applicable/Consistent.</b> While not necessarily applicable on a project-specific basis, the Project would support this action/strategy improving local access, with appropriate design considerations to ensure travel safety and reliability.
<b>2016-2040 RTP/SCS Goal 4:</b> Preserve and ensure a sustainable regional transportation system.	<b>Not Applicable.</b> This goal is directed towards SCAG and does not apply to the Proposed Project. The 2016-2040 RTP states, “A transportation system is sustainable if it maintains its overall performance over time in an equitable manner with minimum damage to the environment, and at the same time does not compromise the ability of future generations to address their transportation needs. Sustainability, therefore, pertains to how our decisions today impact future generations. One of the measures used to evaluate system sustainability is the total inflation-adjusted cost per capita to maintain our overall multimodal transportation system performance at current conditions. The 2016 RTP/SCS includes two additional new measures to support this outcome: State Highway System pavement condition and local roads pavement condition.” <sup>8</sup> As discussed in the Proposed Project’s Traffic Study, the Proposed Project would create a less than significant impact at any of the study intersections.
<b>2016-2040 RTP/SCS Goal 5:</b> Maximize the productivity of our transportation system.	<b>Consistent.</b> The Proposed Project includes 68 new multi-family residential units and is located close to a variety of transit options as a mode of transportation to and from the Project Site. Thus, the Proposed Project will contribute to the productivity and use of the regional transportation system by providing housing near transit. Moreover, as discussed in the Proposed Project’s Traffic Study, the Proposed Project would have a less than significant impact at all of the study intersections.

<sup>8</sup> SCAG, 2016-2040 RTP/SCS, April 2016 (page 164).

Goals and Policies	Consistency Assessment
<p><b>2016-2040 RTP/SCS Goal 6:</b> Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).</p>	<p><b>Consistent.</b> The Proposed Project would place new residential units in a HQTa and a TPA. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation.</p>
<p><b>2016-2040 RTP/SCS Goal 7:</b> Actively encourage and create incentives for energy efficiency, where possible.</p>	<p><b>Consistent.</b> The Proposed Project would comply with the City of Los Angeles Green Building Code, the California Green Building Standards Code (CALGreen), and the Project will incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought tolerant planting, and high performance building envelopment.</p>
<p><b>2016-2040 RTP/SCS Goal 8:</b> Encourage land use and growth patterns that facilitate transit and active transportation.</p>	<p><b>Consistent.</b> As stated above, the Project Site is located in a highly urbanized area in the City of Los Angeles within a HQTa and a TPA. The Project Site is located less than one-half mile from the intersection of two major bus lines, 217 and 780 Metro, with frequency of service intervals of 20 minutes or less during peak commute periods. The Project Site is also located less than one-half mile of a Metro Red Line station. The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal as well.</p>
<p><b>2016-2040 RTP/SCS Goal 9:</b> Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.</p>	<p><b>Not Applicable.</b> This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. No further discussion is required.</p>



Goals and Policies	Consistency Assessment
<b>2016-2040 RTP/SCS Guiding Policy 1:</b> Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	<b>Not Applicable.</b> This policy is directed towards SCAG in allocating transportation investments. This goal does not apply to the individual development projects and no further analysis is required.
<b>2016-2040 RTP/SCS Guiding Policy 2:</b> Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.	<b>Not Applicable.</b> This policy is directed towards SCAG in allocating transportation system funding. Nevertheless, the Proposed Project would contribute to a safe, well maintained, and efficient multimodal transportation system. As discussed in the Proposed Project's Transportation Analysis <sup>9</sup> , the Proposed Project would create a less than significant impact at the study intersections. Additionally, the Proposed Project would not create a significant impact at any CMP monitoring location.
<b>2016-2040 RTP/SCS Guiding Policy 3:</b> RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	<b>Not Applicable.</b> This Goal is directed towards SCAG and the City of Los Angeles and does not apply to the Proposed Project. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation
<b>2016-2040 RTP/SCS Guiding Policy 4:</b> Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	<b>Not Applicable.</b> This policy is directed towards transportation investment by SCAG. However, the Proposed Project's location within a HQTa and a TPA promotes the use of public transit and pedestrian activity.
<b>2016-2040 RTP/SCS Guiding Policy 5:</b> HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	<b>Not Applicable.</b> The policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare. Although this policy is not applicable to the Proposed Project, the Proposed Project's location in a HQTa and a TPA promotes the use of public transit and pedestrian activity.

<sup>9</sup> **Transportation Impact Analysis for the Proposed Senior Apartments At 6650 Franklin Avenue**, Linscott Law & Greenspan Engineers, October 20, 2016. Approved by Los Angeles Department of Transportation (LADOT) January 26, 2017, incorporated herein by reference and included as Appendix G to this analysis.

Goals and Policies	Consistency Assessment
<b>2016-2040 RTP/SCS Guiding Policy 6:</b> The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.	<b>Not Applicable.</b> This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. However, the Proposed Project would support the policy as it is located within a HQTa and a TPA and would support public transportation and other alternative methods of transportation.
<b>2016-2040 RTP/SCS Guiding Policy 7:</b> The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.	<b>Not Applicable.</b> This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments.
<b>2016-2040 RTP/SCS Guiding Policy 8:</b> Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.	<b>Not Applicable.</b> This policy directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project.
<b>2016-2040 RTP/SCS Land Use Policy 1:</b> Identify regional strategies areas for infill and investment.	<b>Not Applicable.</b> This policy is directed towards SCAG to identify regional strategic areas. The Proposed Project is an infill development in a HQTa and within a transit priority area. The Proposed Project would be providing affordable housing units in a highly urbanized area within the City of Los Angeles.
<b>2016-2040 RTP/SCS Land Use Policy 2:</b> Structure the plan on a three-tiered system of centers development. <sup>10</sup>	<b>Not Applicable.</b> This Land Use Policy is directed towards SCAG and does not apply to the Proposed Project.

<sup>10</sup> The 2016-2040 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012-2035 RTP/SCS. The complete language from the original SCAG Advisory Land Use Policies is “Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment.” A more detailed description of these strategies and policies can be found on pages 90-92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.

Goals and Policies	Consistency Assessment
<p><b>2016-2040 RTP/SCS Land Use Policy 3:</b> Develop “Complete Communities”</p>	<p><b>Consistent.</b> SCAG describes the development of “complete communities” to provide areas that encourages households to be developed with a range of mobility options to complete short trips. The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.<sup>11</sup></p> <p>As stated above, the Proposed Project would place senior housing units in a transit-rich area and in the proximity of other existing senior housing units. The Project Site’s location near mass transit and in proximity to services, retail stores, and employment opportunities promotes the use of a variety of transportation options, which include walking, cycling, and the use of public transportation. Therefore, the Proposed Project would be consistent with SCAG’s goals of increasing mixed commercial/residential uses in transit-rich areas near services, retail, and employment opportunities to reduce vehicles-per-miles traveled.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 4:</b> Develop nodes on a corridor.</p>	<p><b>Not Applicable.</b> The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents’ daily needs and that support livable corridors. This policy is directed towards SCAG and the City goals to identify and develop locations that promote nodes. The Proposed Project is located within a HQTAs and a transit-priority area. The Proposed Project’s mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities.</p>

<sup>11</sup> SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).

Goals and Policies	Consistency Assessment
<p><b>2016-2040 RTP/SCS Land Use Policy 5:</b> Plan for additional housing and jobs near transit.</p>	<p><b>Consistent.</b> As stated above, the Proposed Project would provide senior housing units in a HQTA and a TPA. The Project Site is located less than one-half mile from the intersection of two major bus lines, 217 and 780 Metro, with frequency of service intervals of 20 minutes or less during peak commute periods, which would promote the use of a variety of transportation options, which includes walking and the use of public transportation.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 6:</b> Plan for changing demand in types of housing.</p>	<p><b>Consistent.</b> The Proposed Project would provide 67 affordable senior housing units and manager's unit within the City of Los Angeles. The units would help meet the increasing demand for senior housing in proximity to transit and other forms of alternative transportation such as walking and cycling, to get to basic needs.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 7:</b> Continue to protect stable, existing single-family areas.</p>	<p><b>Not Applicable.</b> This Land Use Policy is not applicable to the Proposed Project because the Proposed Project would not demolish any existing single-family homes. Additionally, the Project site is in an area designated for High Density Residential uses and surrounding by other medium- and high-density residential development.</p>
<p><b>2016-2040 RTP/SCS Land Use Policy 8:</b> Ensure adequate access to open space and preservation of habitat.</p>	<p><b>Not Applicable.</b> This Land Use Policy is directed towards SCAG and does not apply to the Proposed Project. The Proposed Project is located within an urbanized area within the City of Los Angeles. Development of the Proposed Project would not remove any areas that have significant value as wildlife habitat since the Project Site is fully developed. The Proposed Project would provide approximately 2,300 square feet of new private open space in the form of balconies, a 1,300-square-foot indoor community room, a 500-square-foot rooftop deck, and a 2,900-square-foot courtyard at the podium level. The new building (described as 'Building B' in the section II, Project Description) provides 7,000 square feet of total useable open space, including 4,700 square feet of common open space. Therefore, the open space exceeds the required amount pursuant to LAMC 12.21 G.</p>

Goals and Policies	Consistency Assessment
<b>2016-2040 RTP/SCS Land Use Policy 9:</b> Incorporate local input and feedback on future growth.	<b>Not Applicable.</b> This Land Use Policy is directed towards SCAG and does not apply to the Proposed Project.
<b>2016-2040 RTP/SCS Benefit 1:</b> The RTP/SCS will promote the development of better places to live and work through measures that encourage more compact development in certain areas of the region, varied housing options, bicycle and pedestrian improvement, and efficient transportation infrastructure.	<b>Consistent.</b> The Proposed Project will provide affordable housing for seniors in a TPA. The Proposed Project will provide a variety of dwelling units sizes, 32 studio units and 36 one-bedroom units ranging from approximately 420 to 520 square feet. The Proposed Project is dedicating 99% of proposed units restricted to Low and Very Low Income Households.
<b>2016-2040 RTP/SCS Benefit 2:</b> The RTP/SCS will encourage strategic transportation investments that add appropriate capacity and improve critical road conditions in the region, increase transit capacity and expand mobility options. Meanwhile, the Plan outlines strategies for developing land in coming decades that will place destinations closer together, thereby decreasing the time and cost of traveling between them.	<b>Not Applicable.</b> Benefit 2 is directed towards SCAG and not does apply to the Proposed Project. The Proposed Project is an infill, residential project located within a HQTa and a TPA, thereby decreasing time and cost of traveling between places.
<b>2016-2040 RTP/SCS Benefit 3:</b> The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households.	<b>Consistent.</b> The Proposed Project includes numerous energy-efficient design features, such as ENERGY STAR rated appliances. <sup>12</sup> It will comply with the City of Los Angeles Green Building Code and the CALGreen. The Project's location near various bus and subway lines will provide future residents with various affordable transportation options.

<sup>12</sup> The ENERGY STAR program, developed by the US Environmental Protection Agency in 1992, is a voluntary measure intended to reduce energy consumption and improve energy efficiency, which has resulted in appliance companies, car companies, home builders, and more stepping in to create and promote more energy efficient products. For products to be designated as ENERGY STAR they must be certified by an independent third-party to provide increased energy efficiency. If the product costs more than a similar non-ENERGY STAR product the purchaser must be able to recoup their investment through utility savings.

Goals and Policies	Consistency Assessment
<b>2016-2040 RTP/SCS Benefit 4:</b> Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.	<b>Consistent.</b> The Proposed Project will encourage improved access and mobility by providing units within an urbanized area of the City of Los Angeles. Dining options surrounding the Project Site are easily accessible by transit options. The Proposed Project proposes approximately 2,300 square feet of private open space in the form of balconies, a 1,300-square-foot indoor community room, a 500-square-foot rooftop deck, and a 2,900-square-foot courtyard at the podium level. In addition, the Proposed Project will provide 7,000 square feet of total useable open space, including 4,700 square feet of common open space. A minimum of 25% of the outdoor common open space will be landscaped with a palette of drought-tolerant plantings. All of these features compliment the features designed to make affordable and accessible units for seniors in the most integrated living setting possible.
<i>Source: SCAG, 2016-2040 RTP/SCS, April 2016, Impact Sciences, 2017.</i>	

#### *Consistency with Criterion #2*

The Proposed Project includes the construction of a total floor area of approximately 53,370 square feet. The Proposed Project includes 68 new multi-family residential units (67 affordable senior units and one on-site-manager's unit); residential uses (which would include indoor community space and mandated outdoor open space) would comprise 100 percent of the building uses. As such, the Proposed Project would be consistent with this Criterion.

#### *Consistency with Criterion #3*

The Project Site is approximately 0.78 acres. The Proposed Project includes 68 new multi-family residential units; as such, the Proposed Project provides approximately 88.3 dwelling units per acre. As such, the Proposed Project would be consistent with this Criterion.

#### *Consistency with Criterion #4*

PRC §21155 (b) defines a "high-quality transit corridor" as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

PRC §21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC §21064.3 defines "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." PRC §21155 (b) states that a "major transit stop" is defined in PRC §21064.3, except that, for purposes of PRC §21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

The Project Site is located less than one-half mile from the Hollywood/Highland Station of the Metro Red Line. The Site is served by the LADOT DASH Hollywood line, directly abutting the property. Additionally, there are several major bus routes running along Franklin Avenue, Highland Avenue, Hollywood Boulevard, and Cahuenga Boulevard (Metro Routes 237 and 656 on Highland Avenue, Routes 212, 217, 222, and 312 on Hollywood Boulevard). Moreover, the 2016-2040 *RTP/SCS* identifies the Project Site as being within a HQT. Therefore, the Proposed Project is located within a high-quality transit corridor. The Proposed Project is consistent with this Criterion.

### **3. INCORPORATION OF APPLICABLE MITIGATION MEASURES FROM PRIOR EIRS**

PRC §21151.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs, including the 2016-2040 *RTP/SCS* Draft Program Environmental Impact Report for Southern California Association of Governments on December 2015 (*RTP/SCS* PEIR).

The Mitigation Monitoring and Reporting Program for the *RTP/SCS* PEIR (SCAG MMRP) does not include project level mitigation measures that are required of the Proposed Project. The SCAG MMRP does provide a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. The City has complied with PRC §21151.2 by reviewing all of the suggested mitigation measures in the SCAG MMRP and reviewed them for imposition on the project. No mitigation measures were imposed if the project was found to be in substantial compliance with the mitigation measure as proposed or if the SCAG MMRP mitigation measure was found not to be relevant. If the project was not found to be in

substantial compliance or the mitigation measure was found relevant, the City considered whether to use the SCAG MMRP mitigation measure or an equally effective City mitigation measure. The City's analysis is found in **Table III-3** below.

**Table III-3**  
**Consistency Analysis with the**  
**2016-2040 RTP/SCS Project Level Mitigation Measures**

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
<b>Aesthetics</b>		
Scenic Vistas	<p>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:</p> <ul style="list-style-type: none"> <li>• Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development.</li> <li>• Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile.</li> <li>• Use alternating facades to “break up” large facades and provide visual interest.</li> <li>• Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas.</li> <li>• Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements.</li> <li>• Retain or replace trees bordering highways, so that clear-cutting is not evident.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<p>Measures not relevant. The proposed project is in a Transit Priority Area (TPA). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.</p>



Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
Visual Character	<p>MM-AES-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 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"> <li>• 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.</li> <li>• Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors.</li> <li>• 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.</li> <li>• Design projects consistent with design guidelines of applicable general plans.</li> <li>• 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.</li> <li>• 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 billboards in good condition, and replace compromised native vegetation and landscape.</li> </ul>	<p>Measures not relevant. The proposed project is in a Transit Priority Area (TPA). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
Light, glare, shade.	<p>MM-AES-4(b): 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"> <li>• Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties.</li> <li>• Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations.</li> <li>• Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.</li> <li>• Use unidirectional lighting to avoid light trespass onto adjacent properties.</li> <li>• Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses.</li> <li>• Provide structural and/or vegetative screening from light-sensitive uses.</li> <li>• Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.</li> <li>• Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.</li> <li>• Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.</li> </ul>	Measures not relevant. The proposed project is in a Transit Priority Area (TPA). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.
<b>Agricultural and Forest Resources</b>		
Conversion of farmland to non-ag uses. Conversion of forest land.	<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</p>	Measure not relevant because agricultural and forest land do not exist in the urban infill area where the proposed project is located.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	<p>account project and site-specific considerations as applicable and feasible:</p> <ul style="list-style-type: none"> <li>• 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).</li> <li>• Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance.</li> <li>• Maintain and expand agricultural land protections such as urban growth boundaries.</li> </ul> <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 <a href="https://www.wildlife.ca.gov/Conservation/Planning/Banking">https://www.wildlife.ca.gov/Conservation/Planning/Banking</a>)</p> <p>“A conservation or mitigation bank is privately or publicly owned land managed for its natural resource values. In exchange for permanently 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. A privately owned conservation or mitigation bank is a free-market enterprise that:</p> <ul style="list-style-type: none"> <li>• Offers landowners economic incentives to protect natural resources;</li> <li>• Saves permittees time and money by providing them with the certainty of pre-approved compensation lands;</li> <li>• Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values;</li> <li>• Provides for long-term protection and management of habitat.</li> <li>• A publicly owned conservation or mitigation bank:</li> <li>• Offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance.”</li> </ul> <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"> <li>• 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.</li> <li>• Include underpasses and overpasses at reasonable intervals to maintain property access.</li> <li>• Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.</li> <li>• 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</li> </ul>	

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	<p>provide compensation for property owners if preservation is not feasible.</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	
Zoning for Ag use, Williamson Act Contract.	<p>MM-AF-2(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 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"> <li>• Project relocation or corridor realignment to avoid lands in Williamson Act contracts.</li> <li>• 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.</li> <li>• Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable.</li> </ul>	Measure not relevant because agricultural land does not exist in urban infill area where the proposed project is located.
<b>Air Quality</b>		
Violation of air quality standards.	<p>MM-AIR-2(b): 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 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>The Proposed Project substantially complies with this measure. The following regulatory control measures would address this measure; no additional measures required:</p> <p>RCM AIR-1: Demolition, grading</p>

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	<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"> <li>• Minimize land disturbance.</li> <li>• Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas.</li> <li>• Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.</li> <li>• Cover trucks when hauling dirt.</li> <li>• Stabilize the surface of dirt piles if not removed immediately.</li> <li>• Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.</li> <li>• Minimize unnecessary vehicular and machinery activities.</li> <li>• Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.</li> <li>• On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.</li> <li>• 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.</li> <li>• Ensure that all construction equipment is properly tuned and maintained.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>	<p>and construction activities must comply with provisions of the SCAQMD District Rule 403, including the following:</p> <ul style="list-style-type: none"> <li>• Apply water to disturbed areas of the site three times a day</li> <li>• Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes</li> <li>• Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.</li> <li>• Limit soil disturbance to the amounts analyzed in this air quality analysis.</li> <li>• All materials transported off-site shall be securely covered.</li> <li>• Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).</li> <li>• Traffic speeds on all unpaved roads to be reduced to 15 mph or less.</li> </ul> <p>RCM AIR-2: Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule</p>

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	<p>to equipment operation at the site.</p> <ul style="list-style-type: none"> <li>• Implement EPA's National Clean Diesel Program.</li> <li>• 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.</li> <li>• On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity.</li> <li>• If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines.</li> <li>• Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines</li> <li>• Convert part of the construction truck fleet to natural gas.</li> <li>• Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts</li> <li>• Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road)</li> <li>• Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas</li> <li>• Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner off-road heavy-duty diesel engines and comply with State off-road regulation</li> <li>• 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</li> <li>• 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</li> <li>• 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.</li> <li>• Prohibit diesel idling within 1,000 feet of sensitive receptors.</li> <li>• Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.</li> <li>• 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.</li> <li>• The engine size of construction equipment shall be the minimum practical size.</li> <li>• Catalytic converters shall be installed on gasoline-powered</li> </ul>	<p>1113, which governs the VOC content of architectural coatings.</p>

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	<p>equipment.</p> <ul style="list-style-type: none"> <li>• Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit.</li> <li>• Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite.</li> <li>• Use new or rebuilt equipment.</li> <li>• Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be checked by an ASE-certified mechanic and determined to be running in proper condition before it is operated.</li> <li>• Use low rolling resistance tires on long haul class 8 tractor-trailers.</li> <li>• Suspend all construction activities that generate air pollutant emissions during air alerts.</li> <li>• Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.</li> </ul>	
Sensitive receptors.	<p>MM-AIR-4(b): 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"> <li>• Set technology forcing new engine standards</li> <li>• Reduce emissions from the in-use fleet</li> <li>• Require clean fuels, and reduce petroleum dependency</li> <li>• Work with US EPA to reduce emissions from federal and state sources</li> <li>• Pursue long-term advanced technology measures.</li> </ul>	<p>The Proposed Project substantially complies with this measure. As previously discussed and list above, regulatory control measures would address this measure; no additional measures required.</p>
<b>Biological Resources</b>		
Candidate, sensitive, or special status species. Riparian or other sensitive natural community. Wetlands. Species movement. Local	<p>MM-BIO-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 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</p>	<p>This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in urban areas in close proximity to transit and therefore Proposed Project site is not anticipated to contain any critical habitat or support any species identified or designated as a candidate, sensitive, or</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
<p>policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.</p>	<p>regulations from the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and/or the California 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"> <li>• Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible</li> <li>• 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 of 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Appoint an Environmental Inspector to monitor implementation of mitigation measures.</li> <li>• 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.</li> <li>• Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance.</li> <li>• Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols 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.</li> </ul>	<p>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. Additionally, adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to nesting birds if present.</p> <p>Los Angeles Municipal Code (LAMC) Sec. 46 Tree Preservation Ordinance (Ordinance No. 177,404) applies to protected trees (4 inches and greater in diameter) that are located on public and private properties. A Tree Report completed for the Proposed Project determined that none of the trees on site are of a protected species.</p>
<p>Riparian or other sensitive natural community. Wetlands. Species movement. Local policies or ordinances protection biological resources.</p>	<p>MM-BIO-2(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 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</p>	<p>This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in an urban area in close proximity to transit and therefore would not contain riparian areas, wetlands or be expected to affect species movement or conservation plans.</p>



Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
HCP, NCCP or other conservation plans.	<p>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"> <li>• 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.</li> <li>• 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</li> <li>• 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 Fully-Protected Species afforded protection pursuant to the State Fish and Game Code.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible.</li> <li>• 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.</li> <li>• Install fencing and/or mark sensitive habitat to be avoided during construction activities.</li> <li>• Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native</li> </ul>	

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	<p>vegetation to all areas of temporary disturbance within the project area.</p> <ul style="list-style-type: none"> <li>• Revegetate with appropriate native vegetation following the completion of construction activities.</li> <li>• Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).</li> <li>• 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 straw bales or other silt-catching devices, and using settling basins to minimize soil transport.</li> </ul>	
<p>Wetlands Species movement.</p> <p>Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.</p>	<p>MM-BIO-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 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"> <li>• Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible.</li> <li>• 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).</li> <li>• 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 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</li> </ul>	<p>This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in an urban area in close proximity to transit and therefore would not impact wetlands and would not affect species movement or, policies, or regulations protecting biological resources.</p>

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	<p>and watershed planning information.</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	
<p>Species movement.</p> <p>Local policies or ordinances protecting biological resources.</p> <p>HCP, NCCP or other conservation plans.</p>	<p>MM-BIO-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 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.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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 the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.</li> <li>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.</li> <li>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.</li> <li>Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible.</li> <li>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.</li> <li>Prohibit construction activities within 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</li> </ul>	<p>The Proposed Project substantially complies with this measure.</p> <p>The site is located in a developed urbanized area and does not provide habitat for sensitive Biological resources. There are no SEAs within the vicinity of the Project Site.<sup>13</sup> Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Proposed Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area. However, a number of mature trees are scattered along the parkways and within the Project Site. Although the trees are all ornamental and nonnative, they may provide suitable habitat, including nesting habitat, for migratory birds. A tree</p>

<sup>13</sup> City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, <http://planning.lacity.org/cwd/gnpln/consvelt.pdf>, accessed September 8, 2017, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, [http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF\\_DraftEIR/GPF\\_FEIR\\_DEIR2.18.pdf](http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf), accessed September 8, 2017.

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	<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat).</li> <li>• 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.</li> <li>• 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 Criterium 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.</li> <li>• Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.</li> <li>• 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.</li> <li>• 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</li> </ul>	<p>survey report was conducted by Tree Case Management in May 2017. Of the 27 identified trees on the Project site, 22 would be removed, with the remaining five trees either preserved in place, or removed, depending on construction methods. The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. Implementation of MM-BIO-4(B) would require that the Proposed Project comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. The Proposed Project will be required to comply</p>

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	<p>establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul>	<p>with the provisions of the MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found.</p>
<p>Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.</p>	<p>MM-BIO-5(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 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.</p> <ul style="list-style-type: none"> <li>Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.</li> <li>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.</li> <li>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</li> </ul>	<p>The Proposed Project substantially complies with this measure. The site is located in a developed urbanized area and does not provide habitat for sensitive Biological resources. There are no SEAs within the vicinity of the Project Site.<sup>14</sup> Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Proposed Project. A tree survey was prepared and no protected trees as</p>

<sup>14</sup> City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, <http://planning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed September 8, 2017, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, [http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF\\_DraftEIR/GPF\\_FEIR\\_DEIR2.18.pdf](http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf), accessed September 8, 2017.

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	<p>species.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Design projects to avoid conflicts with local policies and ordinances protecting biological resources.</li> <li>• 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.</li> </ul>	<p>defined under Los Angeles Municipal Code (LAMC) Ordinance 177,404, i.e., Oaks (<i>Quercus</i> sp.) indigenous to California but excluding the Scrub Oak (<i>Quercus dumosa</i>), Southern California Black Walnut (<i>Juglans californica</i> var. <i>californica</i>), Western Sycamore (<i>Platanus racemosa</i>) and California Bay (<i>Umbellularia californica</i>), present on the project site. In addition, all significant (with 8-inch or greater trunk diameter or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.</p>

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Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	<p>MM-BIO-6(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 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.</p> <ul style="list-style-type: none"> <li>Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs.</li> <li>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.</li> <li>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.</li> </ul>	This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in an urban area in close proximity to transit and therefore would not affect species movement.
Cultural Resources		
Paleontological resources, unique geological features.	<p>MM-CUL-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 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.</p> <ul style="list-style-type: none"> <li>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.</li> <li>Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources.</li> </ul>	<p>The Proposed Project substantially complies with this measure. The Proposed Project is on a previously developed site in an urban area. No unique geological features exist on the site and the potential for the discovery of any unique paleontological resources is considered extremely remote. Implementation of <b>MM-CUL-4</b> would protect paleontological resources from potential impacts associated with the Project: <b>CUL-MM-4</b> If paleontological resources are discovered during</p>

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	<ul style="list-style-type: none"> <li>Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance</li> <li>Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.</li> </ul>	<p>excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if appropriate, salvage. The paleontologist shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey,</p>



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		study or report, and a copy of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.
Historical resources, archeological resources.	<p>MM-CUL-2(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 on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, 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 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 include:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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:</li> <li>• Employ design measures to avoid historical resources and</li> </ul>	<p>The Proposed Project would comply with this Mitigation Measure because City imposes a MM that is equal or more effective than the SCAG MM, as it incorporates measures that avoid or reduce the significant effects on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Such measures include the following:</p> <p>CUL-MM-1: The applicant will engage a historic preservation consultant that meets the Secretary of the Interior's Professional Qualifications Standards to ensure that the connection from the proposed new building to the Montecito Apartments is done with a minimum loss of historic fabric in</p>

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	<p>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> <ul style="list-style-type: none"> <li>• Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources</li> </ul>	<p>compliance with the Secretary of the Interior's Standards for Rehabilitation. The historic preservation consultant will review drawings and conduct on-site construction monitoring throughout the construction phase.</p> <p>CUL-MM-2: The Project shall include a shoring plan to ensure the protection of the Montecito Apartments during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil.</p>

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Human remains.	<p>MM-CUL-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 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 18950-18961 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"> <li>• 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.</li> <li>• If any discovered remains are of Native American origin: Contact the County Coroner to contact the Native American Heritage Commission (NAHC) to ascertain the proper descendants from the deceased individual. The coroner should make 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.</li> </ul>	<p>The Proposed Project substantially complies with this measure.</p> <p>The following regulatory control measure would address this measure:</p> <p>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 (PRC) 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"> <li>▪ Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays)</li> <li>• If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission</li> </ul>

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		<p>(NAHC).</p> <ul style="list-style-type: none"> <li>• The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.</li> <li>• The most likely descendent may make recommendations to the landowner or person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods.</li> <li>• If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.</li> </ul>
<b>Energy</b>		
Residential and commercial energy use.	<p>MM-EN-2(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 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"> <li>• Integrate green building measures consistent with CALGreen into project design</li> <li>• Use energy efficient materials in building design, construction, rehabilitation, and retrofit.</li> <li>• Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.</li> <li>• Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight.</li> <li>• Incorporate passive environmental control systems that account for</li> </ul>	<p>The Proposed Project substantially complies with this measure through PDFs and RCMs.</p> <p>The Proposed Project is located near transit resulting in low fuel consumption and would be multi-family residential development one of the most energy efficient housing types. The Proposed Project will also be constructed to meet all CALGreen and the City's Green Building Code standards. See also regulatory control measures to reduce</p>

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	<p>the characteristics of the natural environment.</p> <ul style="list-style-type: none"> <li>• Use high-efficiency lighting and cooking devices.</li> <li>• Incorporate passive solar design.</li> <li>• Use high-reflectivity building materials and multiple glazing.</li> <li>• Prohibit gas-powered landscape maintenance equipment.</li> <li>• Install electric vehicle charging stations.</li> <li>• Reduce wood burning stoves or fireplaces.</li> <li>• Provide bike lanes accessibility and parking at residential developments.</li> </ul>	GHG emissions.
<b>Geology and Soils</b>		
<p>Earthquake or other seismic activity. Unstable geologic unit or soil, expansive soils.</p>	<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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>	<p>The Proposed Project substantially complies with this measure. The Proposed Project would not exacerbate geologic impacts.</p> <p>Further, the Proposed Project already substantially conforms with this Mitigation Measure as it is subject to regulatory compliance measures, which are 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.</p> <p>GEO-RCM-1: Prior to issuance of any permit, a geology/soils report shall be submitted to the Grading Division to provide design recommendations for the proposed grading/construction along with an</p>

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	<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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 and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.</li> </ul>	<p>evaluation by the project geologist to confirm that the proposed habitable structures are located within the shadow zone of the fault study exploration.</p> <p>In compliance with GEO-RCM-1, a report has been completed and approved by the Los Angeles Department of Building and Safety, Grading Division for the Proposed Project.</p> <p>GEO-RCM-2: During construction, the project engineering geologist shall observe all excavations that expose the natural alluvial soils and bedrock to verify the conclusions of the fault investigation, and confirm that no Holocene faults or ground deformation are exposed. The project engineering geologist shall post a notice on the job site for the City Inspector and the Contractor stating that the excavation (or portion thereof) has been observed, documented and meets the conditions of the report. No fill or lagging shall be placed until the LADBS Inspector has verified the documentation.</p> <p>GEO-RCM-3: A supplemental report that summarizes the geologist's observations (including photographs and simple logs of</p>

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		excavations) shall be submitted to the Grading Division of the Department upon completion of the excavations. If evidence of active faulting is observed, the Grading Division shall be notified immediately. (7009)
Soil erosion, loss of top soil.	<p>MM-GEO-2(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 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"> <li>• 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.</li> <li>• 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"> <li>• File a Notice of Intent (NOI) with the SWRCB.</li> <li>• 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.</li> <li>• Submit to the RWQCB a copy of the SWPPP and evidence of</li> </ul> </li> </ul>	<p>The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to regulatory compliance measures which are capable of avoiding or reducing the significant effects on the potential for the Proposed Project 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.</p> <p>In addition, in compliance with GEO-RCM-1, a report has been completed and approved by the Los Angeles Department of Building and Safety, Grading Division for the Proposed Project.</p>

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	<p>submittal of the NOI to the SWRCB. Implementation of the SWPPP should start with the commencement of construction and continue through the completion of the project.</p> <ul style="list-style-type: none"> <li>• After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB.</li> <li>• 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.</li> <li>• 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.</li> </ul>	
Greenhouse Gases		
GHG Emissions, plan consistency.	<p>MM-GHG-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 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 set forth below:</p> <ul style="list-style-type: none"> <li>• Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision.</li> <li>• 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.</li> <li>• Off-site measures to mitigate a project's emissions.</li> <li>• Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions</li> <li>• 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</li> </ul>	<p>The Proposed Project already substantially conforms with this Mitigation Measure as it is consistent with State, regional, and City of Los Angeles GHG emission reduction goals and objectives, therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In addition to consistency with State, regional, and local GHG emission goals and objectives, the Proposed Project has incorporated various measures to reduce GHG emissions. For example, the Proposed Project would incorporate specific measures to the extent feasible including, but are not limited to electric vehicle charging stations in the parking</p>



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	<p>coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs.</li> <li>• Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles.</li> <li>• Land use siting and design measures that reduce GHG emissions.</li> </ul>	<p>structure; five (5) percent of total spaces would be designated for low emitting, fuel efficient and carpool/van pool vehicles; and 15 percent of the roof area set aside for future solar panels.</p>
<b>Hazards</b>		
<p>Routine transport, use or disposal of hazardous materials, reasonably foreseeable upset, accident. Hazardous emissions near a school.</p>	<p>MM-HAZ-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 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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep</li> </ul>	<p>This Mitigation Measure is not relevant to the Project as the Proposed Project will not result in the routine transport, use, or disposal of hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes, and the use of such substances would comply with State Health Codes and Regulations. Construction could involve the use of potential hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance</p>

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	<p>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.</p> <ul style="list-style-type: none"> <li>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.</li> <li>Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.</li> <li>Avoid overtopping construction equipment fuel gas tanks.</li> <li>During routine maintenance of construction equipment, properly contain and remove grease and oils.</li> <li>Properly dispose of discarded containers of fuels and other chemicals.</li> </ul>	<p>with applicable standards and regulations. According to the Phase I Environmental Site Assessment prepared on September 19, 2014 found the presence of lead-based paint on the project site. The Phase I discusses recommendations to be found in an XRF Survey of the Project under a separate cover (EMG Project No. 110951.14R-001.182), however; there are only minor alterations would be taken to the existing adjacent structure and all regulatory measures would cover any risks. Furthermore, the City of Los Angeles maintains specific code requirements when developments find lead-based paint. All construction activities would occur in adherence with these regulations guiding such activities to minimize any upset or accident release of hazardous materials into the environment.</p>
Hazardous materials sites, Government Code section 65962.5.	MM-HAZ-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 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	This Mitigation Measure is not relevant to the Project as a Phase I Environmental Site Assessment completed for the Proposed Project site indicates that based on review of the regulatory database report, and by cross-referencing name, address, and zip code,

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	<p>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> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency.</li> <li>• 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 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</li> </ul>	<p>EMG was able to conclude that the Project is not 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 not create a significant hazard to the public or the environment.</p>

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	<p>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"> <li>• Use best management practices (BMPs) regarding potential soil and groundwater hazards.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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: 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.</li> <li>• 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.</li> <li>• 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</li> </ul>	

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	<p>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.</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	
Wildland fire risk.	<p>MM-HAZ-8(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 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 measures may include the following, or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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</li> </ul>	This Mitigation Measure is not relevant to the Project as the Project Site is located in an urbanized area that does not contain any wildlands or urbanized areas intermixed with wildlands.

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	<p>and erosion of burned areas than shallow-rooted non-natives.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat.</li> </ul>	
<b>Hydrology and Water Quality</b>		
<p>Violation of water quality standards or waste discharge requirements. Alteration of site drainage, runoff exceeding stormwater drainage system capacity, other degrading water quality.</p>	<p>MM-HYD-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 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"> <li>• Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction.</li> <li>• Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.</li> <li>• 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.</li> <li>• Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.</li> <li>• Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.</li> <li>• 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.</li> <li>• Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.</li> </ul>	<p>The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to regulatory compliance measures which are 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 Board, the City of Los Angeles Low Impact Development (LID) Ordinance and other regulatory agency requirements including, but not limited to, the National Pollution Discharge Elimination System (NPDES) permitting requirements.</p>

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	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	
Depletion of groundwater supply, interfere with groundwater supply.	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	This Mitigation Measure is not relevant to the Project as the Project Site is located in an urbanized area that does not contain any

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	<p>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 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> <p>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.</p> <p>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.</p> <p>Avoid designs that require continual dewatering where feasible.</p> <p>Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface</p> <p>Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.</p>	significant groundwater recharge areas.
Structures within 100-year floodplain hazard area, risk due to levee or dam failure, seiche, tsunami, or mud flow.	<p>MM-HYD-8(b): 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"> <li>• 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.</li> <li>• 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</li> </ul>	This Mitigation Measure is not relevant to the Project as the Project Site is located in an urbanized area that is not within 100-year floodplain hazard area, or at risk due to levee or dam failure, seiche, tsunami, or mud flow.



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	floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	
<b>Land Use</b>		
Land use plans, policies and regulations.	<p>MM-LU-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 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"> <li>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.</li> </ul>	<p>The Proposed Project substantially complies with this measure.</p> <p>The Proposed Project is located in proximity to transit and would be consistent with plans and policies with respect to any potential physical environmental impacts.</p>
Physically divide a community.	<p>MM-LU-2(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 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"> <li>Consider alignments within or adjacent to existing public rights-of-way.</li> <li>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.</li> <li>Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).</li> <li>Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods.</li> <li>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: o Alignment shifts to minimize the area affected</li> </ul>	<p>This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in an urban area and would not divide a community.</p>

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	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>	
<b>Mineral Resources</b>		
Loss of availability of a known mineral resource.	<p>MM-MIN-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 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. 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> <ul style="list-style-type: none"> <li>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.</li> <li>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:</li> <li>Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable.</li> <li>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.</li> <li>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.</li> <li>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</li> </ul>	This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in an urban area where no mineral extraction is taking place.

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	space or other general plan land use categories and zoning that allow for mining of mineral resources.	
Noise		
Expose people to noise in excess of local standards. Excessive groundborne vibration or noise levels. Substantial permanent increase in noise level. Substantial temporary increase in noise levels.	<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"> <li>• Install temporary noise barriers during construction.</li> <li>• Include permanent noise barriers and sound-attenuating features as part of the project design.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Designate an on-site construction complaint and enforcement manager for the project.</li> <li>• Ensure that construction equipment are properly maintained per</li> </ul>	<p>The Proposed Project substantially complies with this measure. The City imposes the following MMs on the project that are equal or more effective than the SCAG MM:</p> <p>NOI-MM-1: All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA.</p> <p>NOI-MM-2: Temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA shall be erected along the Project's northern and western boundaries to obstruct line of sight noise travel from the Project site to Canyon Co-Op School, Las Palmas Senior Citizen Center, and Franklin Avenue Residences.</p> <p>NOI-MM-3: At the Project's eastern and southern boundaries, temporary sound barriers capable of achieving a sound attenuation of at least 15 dBA shall be erected to obstruct line of sight noise travel between the Project site and Cherokee Avenue Residences.</p>

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	<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors.</li> <li>• Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors.</li> <li>• 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.</li> <li>• Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way.</li> <li>• Use noise barriers to protect sensitive receptors from excessive noise levels during construction.</li> <li>• 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.</li> <li>• 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.</li> <li>• Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.</li> <li>• 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.</li> </ul>	<p>In addition, , the Project in part complies with this MM under regulatory control measures relating to LAMC which regulates noise from construction activities, City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided, and LAMC Section 112.02 which requires that any heating, ventilation, and air conditioning (HVAC) system within any zone of the City not cause an increase in ambient noise levels on any other occupied property, would be applied to the Proposed Project.</p>
Expose people to excessive groundborne vibration or noise.	MM-NOISE-2(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 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	This Mitigation Measure is not applicable to the Proposed Project, as analysis has demonstrated that no sensitive receptor would experience potentially damaging levels of ground-borne

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	<p>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"> <li>• 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.</li> <li>• 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.</li> <li>• 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 pile driving noise can be shielded more effectively by a noise barrier/curtain.</li> <li>• 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.</li> </ul>	<p>vibration from the Project's construction activities.</p> <p><i>Note: On-Site sensitive receptors could be as close as a similar distance to the receptors at 1847 N Cherokee. Although on-site receptors are not required to be analyzed under CEQA, the impacts at these receptors would be similar to the impacts experienced at the neighboring 1847 N Cherokee residences, which would be less than significant.</i></p>
Population, Housing and Employment		
Displacement of housing requiring replacement housing elsewhere.	<p>MM-PHE-2(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 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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Prioritize the use existing ROWs, wherever feasible.</li> <li>• Develop a construction schedule that minimizes potential neighborhood detonation from protracted waiting periods between right-of-way acquisition and construction.</li> </ul>	<p>This Mitigation Measure is applicable to transportation projects and would not apply to the Proposed Project. Further, the Proposed Project would involve the construction of new housing and would not involve any displacement of housing.</p>

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<b>Public Services</b>		
Adverse effects associated with new or physically altered government facilities for fire protection and emergency response.	<p>MM-PS-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 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> <ul style="list-style-type: none"> <li>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.</li> <li>During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) 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.</li> </ul>	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact fire protection or emergency services.
Adverse effects associated with new or physically altered government facilities for police protection.	<p>MM-PS-2(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 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,</p>	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact police protection services.

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	<p>taking in to account project and site-specific considerations as applicable and feasible, including:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel.</li> <li>• During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) 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.</li> </ul>	
Adverse effects associated with new or physically altered government facilities for schools.	<p>MM-PS-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 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"> <li>• Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.</li> <li>• During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction</li> </ul>	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact school services.

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	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.	
<b>Recreation</b>		
Increase use and physical deterioration of recreational facilities.	<p>MM-REC-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 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"> <li>• 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.</li> <li>• 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: 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.</li> <li>• 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 in acres of neighborhood park area available per capita in the HQTA.</li> </ul>	<p>This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact recreational facilities.</p> <p>Further, the Proposed Project would substantially comply with the MM by implementing the following regulatory compliance measure :</p> <p>PS-RCM-4: Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.</p>



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Traffic and Transportation		
Conflict with measures of effectiveness for performance of the circulation system.	<p>MM-TRA-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 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 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"> <li>• Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.</li> <li>• 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.</li> <li>• Provide a vanpool for employees.</li> <li>• Fund capital improvement projects to accommodate future traffic demand in the area.</li> <li>• 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: 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 o Pre-tax commuter benefits (checks), On-site car-sharing program (such as City Car Share, Zip Car, etc.), On-site carpooling program, Distribution of information concerning alternative transportation options o Parking spaces sold/leased separately, Parking management strategies; including attendant/valet parking and shared parking spaces.</li> <li>• 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.</li> <li>• Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit</li> </ul>	<p>The Proposed Project already substantially complies with this Mitigation Measure because it incorporates project design features that avoid or reduce 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.</p> <p>In addition, a Construction Plan shall be submitted to LADOT for review and approval in accordance with the LAMC prior to the start of any construction work as well as a traffic study, approved by LADOT on January 26, 2017, determined to incorporate project design features.</p>

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	<p>facilities when feasible.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs.</li> <li>• 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.</li> <li>• Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions.</li> <li>• 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.</li> <li>• Purchase, or create incentives for purchasing, low or zero-emission vehicles.</li> <li>• Create local "light vehicle" networks, such as neighborhood electric vehicle systems.</li> <li>• Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles.</li> <li>• Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.</li> <li>• 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.</li> <li>• Project Selection: Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. <ul style="list-style-type: none"> <li>o Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints.</li> </ul> </li> <li>• Public Involvement: 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.</li> <li>• Transit and Multimodal Impact Fees: Assess transit and multimodal</li> </ul>	

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	<p>impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations. o Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions.</p> <ul style="list-style-type: none"> <li>• System Monitoring: Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency.</li> <li>• Arterial Traffic Management: Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary.</li> <li>• Signal Synchronization: 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.</li> <li>• HOV Lanes: Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions.</li> <li>• Delivery Schedules: 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.</li> <li>• 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.</li> <li>• Bicycle and Pedestrian Trails: 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.</li> <li>• Bicycle Safety Program: Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers.</li> <li>• Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects.</li> <li>• Bicycle Parking: 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).</li> <li>• Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following: Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation; Eliminate or</li> </ul>	

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	<p>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.</p> <ul style="list-style-type: none"> <li>Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: 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; Promote the use of bicycles by providing space for the operation of valet bicycle parking service.</li> <li>Parking “Cash-out” Program: Require new office developments with more than 50 employees to offer a Parking “Cash-out” Program to discourage private vehicle use.</li> <li>Pedestrian and Bicycle Promotion: 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.</li> <li>Fleet Replacement: 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.</li> </ul>	
Conflict with applicable Congestion Management Plan.	<p>MM-TRA-2(b): 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"> <li>Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities,</li> </ul>	<p>This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would generate enough traffic to significantly impact the adopted Congestion Management Plan.</p>

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	<p>including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: 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.</p> <ul style="list-style-type: none"> <li>• 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: 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 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 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, Repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to</li> </ul>	

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	<p>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.</p> <ul style="list-style-type: none"> <li>• 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: Ensure transportation centers are multi-modal to allow transportation modes to intersect. 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.</li> <li>• Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including: Ensure transit stops and bus lanes are safe, convenient, clean and efficient. Ensure transit stops have clearly</li> </ul>	

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	<p>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.</p> <ul style="list-style-type: none"> <li>• Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including: 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.</li> <li>• 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: 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.</li> <li>• Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including: 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.</li> <li>• Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including: 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. Provide public recognition of effective programs through awards, top ten lists, and other mechanisms.</li> <li>• 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.</li> <li>• Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations.</li> <li>• Create a free or low-cost local area shuttle system that includes a</li> </ul>	

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	<p>fixed route to popular tourist destinations or shopping and business centers.</p> <ul style="list-style-type: none"> <li>• Work with existing shuttle service providers to coordinate their services.</li> <li>• Facilitate employment opportunities that minimize the need for private vehicle trips, including:               <ul style="list-style-type: none"> <li>o 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.</li> </ul> </li> <li>• Enforce state idling laws for commercial vehicles, including delivery and construction vehicles.</li> <li>• Organize events and workshops to promote GHG-reducing activities.</li> <li>• Implement a Parking Management Program to discourage private vehicle use, including: 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.</li> <li>• Work with school districts to improve pedestrian and bicycle to schools and restore school bus service</li> <li>• Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities.</li> <li>• Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency.</li> <li>• Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers.</li> <li>• Synchronize traffic signals to reduce congestion and air quality.</li> <li>• Work with community groups and business associations to organize and publicize walking tours and bicycle events.</li> <li>• Support legislative efforts to increase funding for local street repair.</li> </ul>	
<p>Inadequate emergency access.</p> <p>Impair or interfere with Emergency Response Plan or Evacuation Plan.</p>	<p>MM-TRA-5(b): 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 transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad</li> </ul>	<p>The Proposed Project already substantially complies with this Mitigation Measure because the design of the Proposed Project would not cause any alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. In addition, the Applicant will submit a parking</p>



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	<p>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: 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. Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Enhance emergency preparedness awareness among public agencies and with the public at large.</li> <li>• Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: 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.</li> </ul>	<p>and driveway plan for review by the Los Angeles Fire Department (LAFD), the Bureau of Engineering (BOE) and the Los Angeles Department of Transportation (LADOT) to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access.</p>

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Utilities and Service Systems		
Require new or expanded entitlements for wastewater treatment.	<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. 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>This Mitigation Measure is not applicable to the Proposed Project because analysis has demonstrated that the net increase of wastewater from the Proposed Project would not significantly impact the Hyperion Water Treatment Plant and no new or expanded entitlements for wastewater treatment would be required.</p>
Require new or expanded entitlements for water supply.	<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 provisions. Such measures may include the following or other comparable measures identified by the Lead Agency:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.</li> <li>• 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</li> </ul>	<p>This Mitigation Measure is not applicable to the Proposed Project because analysis has demonstrated that the net increase of water demand from the Proposed Project would be within the projections of the City of Los Angeles's 2015 Urban Water Management Plan and no new or expanded entitlements for water supply would be required.</p>

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	<p>possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Avoid designs that require continual dewatering where feasible.</li> <li>• Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.</li> </ul>	
Landfill capacity.	<p>MM-USS-6(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 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 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"> <li>• Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: Reuse and minimization of construction and demolition (C&amp;D) debris and diversion of C&amp;D waste from landfills to recycling facilities, Inclusion of a waste management plan that promotes maximum C&amp;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</li> </ul>	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to regulatory compliance measures that avoid or reduce 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.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	<p>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, Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target. o 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>	
SOURCE: 2016 SCAG RTP/SCS FEIR; Impact Sciences, 2018		

#### 4. SB 375 STREAMLINING BENEFITS

Pursuant to PRC §21155.2(a), if the Proposed Project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to PRC §21081, shall be eligible for either the provisions of subdivision (b) (sustainable communities environmental assessment) or (c) (limited analysis EIR). The Proposed Project would follow subdivision (b), and the Proposed Project would be reviewed through a sustainable communities environmental assessment (SCEA), which provides streamlining benefits.

PRC §21155.2(b) states that an initial study shall be prepared to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to PRC §21159.28 based on substantial evidence in light of the whole record. The initial study shall identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports.

Where the lead agency determines that a cumulative effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable. As such streamlining benefits include:

1. Cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports shall not be treated as cumulatively considerable for the Proposed Project (PRC §21155.2(b)(1));
2. Growth-inducing impacts are not required to be referenced, described, or discussed (PRC §21159.28(a));
3. Project-specific or cumulative impacts from cars and light-duty truck trips generated by the Proposed Project on global warming or the regional transportation network are not required to be referenced, described, or discussed (PRC §21159.28(a));
4. Reduced density alternatives are not required to be referenced, described, or discussed to address the effects of car and light-duty truck trips generated by the Proposed Project (PRC §21159.28(b)).

The City of Los Angeles, Department of City Planning would incorporate all applicable streamlining benefits in the environmental review of the Proposed Project.

## 5. SCOPE OF ANALYSIS

Pursuant to PRC §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to PRC §21159.28 based on substantial evidence in light of the whole record. The SCEA would also be required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. As such, the SCEA would analyze the following topics:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Mandatory Findings of Significance