SECTION 3
SCEA Criteria and Transit Priority Project Consistency Analysis

3.1 Senate Bill 375

The State of California adopted Senate Bill (SB) 375, the Sustainable Communities and Climate Protection 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 the State's 18 metropolitan planning organizations incorporate a "sustainable communities strategy" with their respective 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.

For the SCAG region, pursuant to SB 375, CARB set greenhouse gas (GHG) emissions reduction targets that were updated in 2018 to an 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions, which became effective October 1, 2018.[1] On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The 2016 RTP/SCS outlines strategies that meet or exceed these targets set by CARB.[2] On June 28, 2016, pursuant to California Government Code Section 65080(b)(2)(1), CARB accepted SCAG's determination that its 2016 RTP/SCS would, if implemented, achieve CARB's applicable GHG reduction targets.[3]

1 California Air Resources Board, SB 375 Regional Plan Climate Targets, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets. Accessed December 2018.

2 Southern California Association of Governments, 2016–2040 Regional Transportation Plan / Sustainable Communities Strategy, Introduction, April 19, 2012, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf. Accessed December 2018.

3 California Air Resources Board, Executive Order No. G-16-066, https://www.arb.ca.gov/cc/sb375/scag_executive_order_g_16_066.pdf. Accessed December 2018.

3.2 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 (Public Resources Code [PRC] Section 21155 (a) and (b)):

1. Is consistent with the use designation, density, building intensity, and applicable policies specified for the project area in SCAG's 2016 RTP/SCS;
2. Contains at least 50 percent residential use, based on total building square footage and if, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provides a minimum net density of at least 20 units per acre; and
4. Is located within one-half mile of a major transit stop or high-quality transit corridor included in the 2016 RTP/SCS.

Consistency with Criterion 1: Project uses designation, density, building intensity, and applicable policies specified for the Project Area in SCAG's 2016 RTP/SCS.

The Project is consistent with applicable goals and policies presented within SCAG's 2016 RTP/SCS, as shown by the consistency analysis presented in **Table 3-2**.

TABLE 3-2
CONSISTENCY ANALYSIS WITH THE 2016–2040 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITY STRATEGY POLICES

Goals and Policies	Consistency Assessment
2016–2040 RTP/SCS Goals	
Goal 1. Aligning the plan investments and policies with improving regional economic development and competitiveness	**Not Applicable.** This Goal is directed towards SCAG and the City of Los Angeles and not does apply to individual development projects such as the Project.
Goal 2: Maximize mobility and accessibility for all people and goods in the region.	**Consistent.** The City of Los Angeles has conducted a comprehensive study that describes the baseline health conditions in the City and provides a context for understanding the demographic conditions, social and economic factors, physical environment, access to health care, and health behaviors contributing to the health of City residents and workers. The findings are documented in the Health Atlas for the City of Los Angeles (Health Atlas), published in June 2013. While the primary focus of the Health Atlas is on factors that affect the health behaviors and the health status of residents and workers, much of the data is relevant to land use transportation and GHG emissions as those topics involve similar issues regarding land use patterns, urban design, and transportation systems. Data in the Health Atlas is organized by Community Plan Area (CPA). The Project Site is located in the Wilshire CPA. According to the City data in the Health Atlas, the Wilshire CPA is rated a 3 on the Walkability Index Score by Community Plan Area, which reflects high walkability.[4] City data in the Health Atlas for the Wilshire CPA also indicate that approximately 23 percent of workers commute to work by walking, biking, and public transportation, as compared to the approximately 5.2 percent of nationwide workers that commute to work by

[4] http://healthyplan.la/the-health-atlas/, p. 111.

Goals and Policies	Consistency Assessment
	walking, biking, and public transportation , based on census data for the 2011 to 2015 period.[5]As the Health Atlas only tracks data at the CPA level, walkability data was also gathered for the Project Site specifically. According to the Walkscore.com, the Project Site is rated 96 for walk score, which means most errands can be accomplished on foot and many residents are able to forgo owning a car.[6] The Project Site also rates "Excellent Transit" in transit with an 81, which means alternative modes of transportation are convenient for most trips.[7] In addition, the City of Los Angeles adopted the Health and Wellness General Plan Element (Plan for a Healthy Los Angeles) in March 2015 that provides a high-level policy vision, along with goals and objectives to elevate health as a priority for the City's future growth and development. Some of the land use goals include accommodating a diversity of land uses, encouraging development near mobility options, supporting transit-oriented development, and emphasizing bicycle mobility. The Project would be consistent with the Plan for a Healthy Los Angeles as the Project Site is located in a transit-rich and pedestrian accessible location with connectivity to many areas within the City. The Project Site is located less than 0.10 miles north of the Metro Rail Wilshire/Vermont light rail station, which is serviced by the Metro Purple Line and the Metro Red Line. The Metro Purple Line route provides a connection between Mid-Wilshire/Koreatown and Downtown Los Angeles. The Purple Line Extension, which is under development, will ultimately extend westward for approximately nine miles, providing additional stations at the Miracle Mile area, the City of Beverly Hills, Century City, and Westwood. The first section of the Purple Line Extension between the new Wilshire/Western station and new Wilshire/La Cienega station is currently under construction and is scheduled for completion in 2023.[8] The Project Site is also located in proximity to multiple bus stops with high frequency transit service. Nearby transit service includes DASH Wilshire Center/Koreatown, and regular metro lines 18, 51, 52, 201, 204 and 351. The Mobility Plan 2035, which was initially adopted by the City Council in August 2015 and amended and re-adopted in November 2015, January 2016, and September 2016, is a comprehensive update of the City's Transportation Element that incorporates "complete streets" principles. The Mobility Plan 2035 identifies a Transit Enhanced Network (TEN), a Neighborhood Enhanced Network (NEN) to support pedestrian activity, and an expanded Bicycle Enhanced Network (BEN). Among other provisions, the Mobility Plan 2035 includes roadway designations pursuant to updated policies and current transportation needs in the City. The Mobility Plan 2035 also incorporates by reference and updates provisions of City's 2010 Bicycle Plan; and serves as the basis for discussion of impacts on bicycle facilities below. The Mobility Plan 2035 designates a network of bicycle lanes (Tier 1 Protected, Tier 2 and Tier 3) and bicycle paths.[9] The Project would support bicycle and transit mobility. Near the Project Site, Tier 2 bike lanes are provided along 7th Street east of Normandie Avenue and South Rampart Boulevard east of Hoover Street. Tier 3 bike lanes are provided along New Hampshire Avenue north of West 6th Street and along W. 4th Street west of Hoover Street. The Project would encourage the utilization of transit due to its close proximity to bus lines, the Metro Wilshire/Vermont Rail Station, and bicycle lanes. The Project would include 158 bicycle parking spaces, satisfying LAMC requirements. Therefore, the Project is consistent with this goal.

5 https://www.bts.gov/sites/bts.dot.gov/files/docs/browse-statistical-products-and-data/bts-publications/transportation-statistics-annual-reports/215366/2017-tsar-ch2.pdf, p. 2-1. October 3, 2018.

6 https://www.walkscore.com/score/550-shatto-pl-los-angeles-ca-90020. Accessed May 5, 2019

7 https://www.walkscore.com/score/550-shatto-pl-los-angeles-ca-90020. Accessed May 5, 2019.

8 https://www.metro.net/projects/westside/. Accessed October 3, 2018.

9 City of Los Angeles Mobility Plan 2035, p. 67, http://ladot.lacity.org/sites/g/files/wph266/f/mobilityplnmemo.pdf.

Goals and Policies	Consistency Assessment
Goal 3: Ensure travel safety and reliability for all people and goods in the region.	**Not Applicable.** This Goal is directed towards SCAG and the City of Los Angeles and not does apply to individual development projects such as the Project. Nevertheless, the Project would improve public safety infrastructure near the Project Site by providing new lighting within the Project Site and around the perimeter including new building identification, commercial accent lighting, wayfinding, balcony lighting, and security lighting. Pedestrian areas including pathways and entryways into the Project would be well-lit for security. Pedestrian access to the Project would be distinct from vehicle driveways and the Project would not mix pedestrian and automobile traffic to ensure pedestrian safety. The Project would be subject to Site Plan review to ensure vehicle and pedestrian safety throughout the Project.
Goal 4: Preserve and ensure a sustainable regional transportation system.	**Not applicable**. This Goal is directed towards SCAG and does not apply to the Project. Nevertheless, the Project would minimize impacts on the existing roadway system by placing housing near jobs and transit, and providing ample bicycle parking and pedestrian infrastructure to incentivize increased biking and walking. The Project also encourages increased rail and transit use, thereby contributing to increased ridership and sustainability of the City's multimodal transportation system in the region. For example, the Project would be located in close proximity to the Metro Wilshire/Vermont Rail Station.
Goal 5: Maximize the productivity of our transportation system.	**Consistent**. This Goal is directed towards SCAG and does not apply to the Project. Nevertheless, the Project would encourage the use of mass transit, walking and bicycling, as the Project would locate mixed-use residential and commercial development on a Project Site that is located near numerous bus lines, the Metro Wilshire/Vermont Rail Station, and bike lanes. Since the Project would develop residential uses within walking distance of existing bus lines and light rail transit stations, and would also provide long-term and short-term bicycle parking, the Project would provide opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the Project area. Thus, the Project would encourage the utilization of mass transit as a mode of transportation to and from the Project Site area and contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. The Project would be consistent with this goal.
Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**Consistent**. The Project would be consistent with this Goal by facilitating the use of alternative modes of transportation, which would aid in reducing car trips and positively impact air quality. The Project includes 158 bicycle parking spaces for the residential and commercial uses of the Project. The Project would encourage pedestrian travel by incorporating new residential and commercial uses in its mixed-use development by locating this development on a Project Site located within walking distance of businesses in the area, as well as within close proximity to multiple transit options. Furthermore, the Project would include pedestrian-friendly landscaping and design, a new street level plaza, streetscape improvements, and street level commercial uses that would enliven the pedestrian experience.
Goal 7: Actively encourage and create incentives for energy efficiency, where possible.	**Consistent**. As described with regard to Goal 6, above, the Project would be consistent with this Goal by reducing passenger car trips and encouraging and supporting transit, which reduces transportation energy demand. In addition, the Project would be required to comply with California Building Code Title 24. The Project would achieve its energy and water efficiency through the implementation of multiple measures including, but not limited to, energy efficient Heating Ventilation and Air Conditioning (HVAC) and lighting systems, and energy star appliances, and low flow plumbing fixtures. The Applicant proposes that 20 percent of the proposed parking spaces would be roughed-in with metal conduit only for future wiring to support future growth of EV charging stations. Of the 20 percent, the Applicant proposes to incorporate 5 percent of the parking spaces as electric vehicle (EV) ready with metal conduit and electric wire pulled ready for charging station equipment installation.
Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent**. The Project's location and mix of land uses would encourage the use of transit, walking and bicycling. The Project would locate its mixed-use residential, office, and commercial development on a Project Site that is located within a HQTA and TPA near numerous bus lines, the Metro Rail Station Wilshire/Vermont, bike lanes, and a pedestrian network. Consistent with land within a HQTA, the Project would be developed at a greater intensity than the development that currently exists on the Project Site and would set aside 11 percent of its total residential units (29 affordable units) for Extremely Low

Goals and Policies	Consistency Assessment
	Income Households. The Project's increased density at the Project Site provides a foundation for the implementation of other strategies for HQTAs and TPAs such as enhanced transit services, and facilitates the use of transit by more people. In turn, as transit ridership in an area increases with density, local transit providers are justified in providing enhanced transit services for the area. As a result, the Project would support and be consistent with land use and growth patterns that facilitate transit and active transportation by: providing a mix of land uses; creating a range of housing opportunities and choices for people at different income levels; creating walkable areas; providing infill development within existing communities; providing a variety of transportation choices; and providing opportunities for residents and visitors to use public transit for work trips, and walk to retail businesses near the Project site. The Project is consistent with this goal.
Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**Not Applicable**. This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. No further discussion is required for individual projects such as the Project.
Guiding Policy 1: Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	**Not Applicable**. This policy is directed towards SCAG in allocating transportation investments. This goal does not apply to the individual development projects such as the Project, and no further analysis is required.
Guiding Policy 2: 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.	**Not Applicable**. This policy is directed towards SCAG in allocating transportation system funding. Nevertheless, the Project would contribute to a safe, well maintained, and efficient multimodal transportation system. As discussed in the Project's Transportation Analysis, the Project would create a less than significant impact at the study intersections. Additionally, the Project would not create a significant impact at any CMP monitoring location.
Guiding Policy 3: RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	**Not Applicable.** This Goal is directed towards SCAG and the City of Los Angeles and does not apply to individual projects such as the Project. The Project Site's urban infill location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian- friendly environment and advances smart growth initiatives. The location of the Project Site also promotes the use of a variety of transportation options, which includes walking and the use of public transportation
Guiding Policy 4: Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	**Not Applicable.** This policy is directed towards transportation investment by SCAG and does not apply to individual projects such as the Project. However, the Project Site's location within a HQTA and a TPA promotes the use of public transit and pedestrian and bicycle activity.
Guiding Policy 5: HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	**Not Applicable**. The policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare and does not apply to individual projects such as the Project.
Guiding Policy 6: The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.	**Not Applicable**. This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles and does not apply to individual projects such as the Project. However, the Project would be located within a HQTA and a TPA and, as such, would support public transportation and other alternative methods of transportation that reduce single-occupancy vehicle use.
Guiding Policy 7: 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.	**Not Applicable**. This policy is directed towards SCAG and governmental agencies to encourage and support particular transportation investments and does not apply to individual projects such as the Project.

Goals and Policies	Consistency Assessment
Guiding Policy 8: 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.	**Not Applicable**. This policy directed towards SCAG and the City of Los Angeles and not does apply to individual projects such as the Project.
Land Use Policy 1: Identify regional strategic areas for infill and investment.	**Not Applicable.** This policy is directed towards SCAG to identify regional strategic areas and does not apply to individual projects such as the Project. However, the Project is an infill development proposed on an urban infill site located in a HQTA and within a TPA. The Project would be providing affordable housing units in a highly urbanized area within the City of Los Angeles.
Land Use Policy 2: Structure the plan on a three-tiered system of centers development	**Not Applicable.** This Land Use Policy is directed towards SCAG and does not apply to individual projects such as the Project. Nevertheless, the Project is an infill development in a HQTA and within a TPA.
Land Use Policy 3: Develop "Complete Communities"	**Consistent.** SCAG describes the development of "complete communities" as providing areas that encourage households to be developed with a range of mobility options to complete short trips.[10] The 2016 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.[11] The Project Site's location near mass transit and in close proximity to services, commercial development, and employment opportunities promotes the use of a variety of transportation options, which include walking, cycling, and the use of public transportation to complete the trips needed to serve its future residents' needs. Therefore, the 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.
Land Use Policy 4: Develop nodes on a corridor.	**Not Applicable**. The 2016 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's goals to identify and develop locations that promote nodes and does not apply to individual projects such as the Project. However, as described above regarding Land Use Policy 3, the Project is located within a HQTA and a TPA. The Project's mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities to meet its residents' needs.
Land Use Policy 5: Plan for additional housing and jobs near transit.	**Consistent**. This Land Use Policy is directed towards SCAG and does not apply to individual projects such as the Project. However, as stated above, the Project would provide commercial uses and residential units in a HQTA and a TPA. The Project Site is located less than 500 feet from the Metro Wilshire/Vermont Rail Station, 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.
Land Use Policy 6: Plan for changing demand in types of housing.	**Consistent**. This Land Use Policy is directed towards SCAG and does not apply to individual projects such as the Project. However, the Project would provide 29 units affordable to Extremely Low Income Households within the City of Los Angeles. The units would help meet the increasing demand for affordable housing in proximity to transit and other forms of alternative transportation such as walking and cycling, to get to basic needs. The overall project including the townhome units, would provide 256 new housing units in range of sizes including studios, one-bedroom, two-bedroom, and three-bedroom units including to help meet the needs of a diversity of household types and sizes. Additionally, of the 256 total dwelling units, 29 units, or approximately 11 percent of the total number of dwelling units, would be designated as restricted affordable housing for Extremely Low Income Households.

[10] http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf, p. 79.

[11] http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf, p. 79.

Goals and Policies	Consistency Assessment
Land Use Policy 7: Continue to protect stable, existing single-family areas.	**Not Applicable**. This Land Use Policy is directed towards SCAG and does not apply to individual projects such as the Project. Even so, the Project would not demolish any existing single-family homes. Additionally, the Project Site is located in an area designated for High Density Residential uses and surrounded by other medium- and high-density residential development.
Land Use Policy 8: Ensure adequate access to open space and preservation of habitat.	**Not Applicable**. This Land Use Policy is directed towards SCAG and does not apply to individual projects such as the Project. Nevertheless, the Project is located within an urbanized area within the City of Los Angeles. Development of the Project would not remove any areas that have significant value as wildlife habitat since the Project Site is currently fully developed. The Project is designed to integrate the new mixed-use building and the former church building into a cohesive, active Project. Both components have been designed to activate the pedestrian environment with the inclusion of a ground level restaurant and outdoor patio, ground level office uses, inclusion of a public plaza and open space, perimeter landscaping, and at-grade and subterranean parking that is hidden from the street.
Land Use Policy 9: Incorporate local input and feedback on future growth.	**Not Applicable**. This Land Use Policy is directed towards SCAG and does not apply to individual projects such as the Project.
Benefit 1: 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.	**Consistent.** This Land Use Policy is directed towards SCAG and does not apply to individual projects such as the Project. However, the Project's mixed-use design and location provide this benefit as the Project proposes greater density on the Project Site, which is an urban infill site located in a HQTA and TPA, which would encourage the use of transit, walking and bicycling. The Project would locate mixed-use residential and commercial development on a Project Site that is located near the Metro Wilshire/Vermont Rail Station and numerous bus lines. The Project would provide a variety of dwelling unit sizes, including studio, one-bedroom, two-bedroom and three-bedroom units that accommodate a range of household types and sizes. In addition, the Project would set aside 11 percent of the total units (29 affordable units) to Extremely Low Income Households. The Project includes 158 bicycle parking spaces for residential and commercial uses. The Project is designed to integrate the new mixed-use building and the former church building into a cohesive, active Project. Both components have been designed to activate the pedestrian environment with the inclusion of a ground level restaurant and outdoor patio, ground level office uses, inclusion of a public plaza and open space, perimeter landscaping, and at-grade and subterranean parking that is hidden from the street. The Project would also would enhance the streetscape and walkability by providing ground floor commercial use, street trees, and landscaping. The Project is located in a major metropolitan area that is well served by regional and local transit, as well as other modes of transportation. The Project is located within approximately 500 feet of the Metro Rail Wilshire/Vermont light rail station. The Project is also located in close proximity to multiple bus routes including Metro bus lines. The Project's long-term and short-term bicycle parking would afford people more opportunities to bicycle, walk and pursue other active alternatives to driving. The Project's location in an urban infill area and its mixture of land uses would provide residents and visitors with employment and dining options that are easily accessible on foot or by bicycle. The Project would contribute to the productivity and use of the regional transportation system by providing housing and jobs near transit. The Project would be consistent with and provide this benefit.
Benefit 2: 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.	**Not applicable**. Benefit 2 is directed towards SCAG and does not apply to individual projects such as the Project. Nevertheless, the Project is an infill, mixed use project that would increase the density on the Project Site, which is located within a High Quality Transit Area and a Transit Priority Area. As such, the Project would support and encourage non-vehicular travel, thereby decreasing trips and congestion, and the time and cost of traveling between places.

Goals and Policies	Consistency Assessment
Benefit 3: The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households.	**Consistent**. As described with regard to Goals 6 and 7, above, the Project would reduce single-passenger vehicle trips and encourage and support transit, which would reduce transportation energy demand. In addition, the Project would be required to comply with California Building Code Title 24. The Project would achieve its energy and water efficiency through the implementation of multiple measures including, but not limited to, energy efficient Heating Ventilation and Air Conditioning (HVAC) and lighting systems, and the applicant proposes that 20 percent of the proposed parking spaces would be roughed-in with metal conduit only for future wiring to support future growth of EV charging stations. Of the 20 percent, the Applicant proposes to incorporate 5 percent of the parking spaces as electric vehicle (EV) ready with metal conduit and electric wire ready for charging station equipment installation. The Project would also allow for lower transportation costs for the Project's future residents by incorporating bicycle-and pedestrian-friendly element sand being located near various bus lines, and the Metro Wilshire/Vermont Station. The Project's location and design will provide future residents with various affordable transportation options. As such, the Project is consistent with achieving this benefit.
Benefit 4: 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.	**Consistent.** See discussion regarding Goals 6 and 7, above. The Project would encourage improved access and mobility by providing residential uses for people at different income levels within walking distance of existing bus lines and light rail transit stations, including numerous Metro and LADOT and DASH bus lines. The Project Site is approximately 500 feet from the Metro Wilshire/Vermont Rail Station. The Project would also provide long-term and short-term bicycle parking which would help people have more opportunities to bicycle, walk and pursue other active alternatives to driving. The Project's location in an urban infill area would provide residents and visitors with shopping and dining options that are easily accessible on foot or by bicycle. The Project's design and location would help to improve air quality and the well-being of people as they would have greater opportunities for pedestrian and bicycling activity and to reduce their reliance on automobiles. The Project would result in and is consistent with achieving this benefit.

Use Designation, Density, and Building Intensity

As discussed above, for the SCAG region, CARB has set GHG emissions reduction targets to 8 percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. The 2016 RTP/SCS outlines strategies that meet or exceed these targets set by CARB[12] and balances Southern California's regional future mobility and housing needs with economic, environmental and public health goals.[13] On June 28, 2016, CARB accepted SCAG's quantification of GHG emission reductions from the 2016 RTP/SCS and its determination that the 2016 RTP/SCS would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by CARB.[14]

For the reasons stated below, the Project is consistent with the land use designation, density, and building intensity in the SCAG 2016 RTP/SCS.

[12] Southern California Association of Governments, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, Introduction, April 19, 2012, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf. Accessed December 2018.

[13] http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf, p. 2.

[14] California Air Resources Board, Executive Order No. G-16-066, https://www.arb.ca.gov/cc/sb375/scag_executive_order_g_16_066.pdf. Accessed December 2018.

Land Use Designation. For its 2016 RTP/SCS, using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 Place Types, and then classified sub-regions into one of three land use development categories (LDCs): urban, compact, or standard.[15] SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region. (2016–2040 RTP/SCS, pp. 20-21.) SCAG notes that the LDCs utilized in the RTP/SCS are not intended to represent detailed land use policies, but are used to describe the general conditions likely to occur within a specific area if recently emerging trends, such as transit-oriented development, were to continue in concert with the implementation of the 2016 RTP/SCS.

The Project Site is located in an area that is within an "Urban" Land Development Category (LDC) – the highest density and most intense land development category assessed in the 2016 RTP/SCS (refer to **Figure 3-1** and **Figure 3-2**). The RTP/SCS defines the 'Urban' areas as often found within and directly adjacent to moderate and high density urban centers. The most intense development types are anticipated in the 'Urban' Land Use Development Category, as compared to 'Compact' and 'Standard,', and is therefore the appropriate Land Use Development Category to accommodate the most intense development types.

According to the 2016 RTP/SCS, "nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multi-family and attached single-family (townhome), which tend to consume less water and energy than the large 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."[16]

The 2016–2040 RTP/SCS includes various "urban" footprint place types, including mixed use, residential, commercial, office, R&D, industrial, civic, and open space. More specifically, the Urban Mixed-Use and Urban Residential footprints are characterized as the following:[17]

- **Urban Mixed Use:** The Urban Mixed-Use place types are exemplified by a variety of intense uses and building types. Typical buildings are between 10 and 40 plus stories tall, with offices and/or residential uses and ground-floor retail space. Parking is typically structured, below or above ground. Workers, residents, and visitors are well served by transit and can walk or bike for many of their transportation needs.
- **Urban Residential:** The Urban Residential place types are typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking is usually structured below or above ground. Residents within Urban Residential place types are well served by transit, and can walk or bicycle for many of their daily needs.

15 http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf, Page 20.
16 http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf, Page 20.
17 SCAG, SCS Background Documentation Appendix, April 2016.

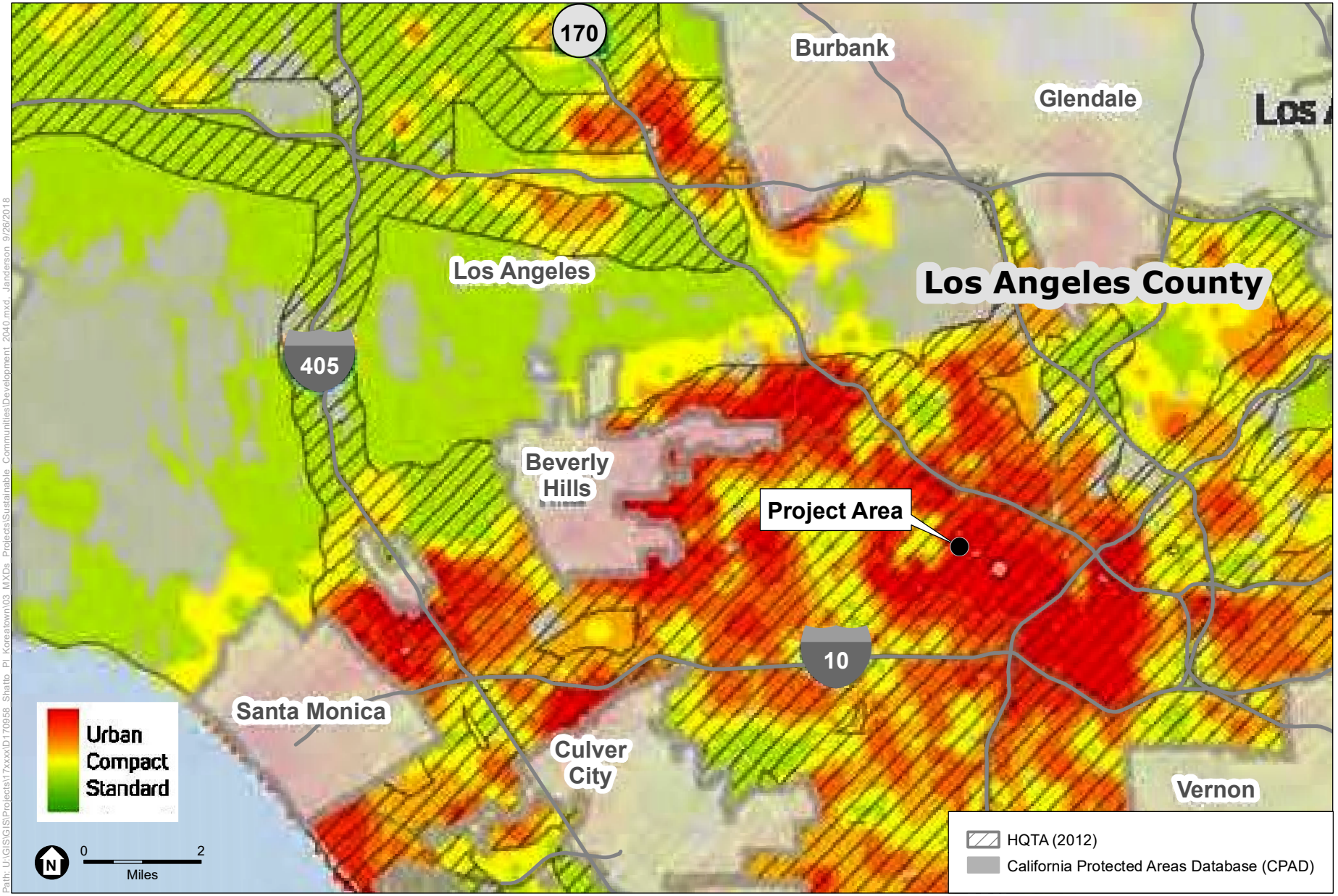
Path: U:\GIS\GIS\Projects\17xxxx\D170958_Shatto_Pl_Koreatown\03_MXDs_Projects\Sustainable_Communities\Development_2012.mxd_Janderson_9/26/2018

SOURCE: SCAG 2015

550 Shatto Place

Forecasted Regional Development Types by Land Development Categories (2012)

Figure 3-1



SOURCE: SCAG 2015

550 Shatto Place

Forecasted Regional Development Types by Land Development Categories (2040)

Figure 3-2

Density. The Project is consistent with the Urban Land Use Development Category and the Urban Mixed Use and Urban Residential place types as described in the 2016 RTP/SCS. The Project Site is located within a highly urbanized area within the City of Los Angeles, within the Wilshire Community Plan Area. On the northern portion of the Project Site, the Project would include a new 341-foot-tall high-rise building containing 252 residential units. The northern portion of the Project Site also includes 2,507 square feet of ground-floor office uses and four townhome units facing Shatto Place. The southern portion of the Project Site would also include the reuse of a former church building that would be converted into 12,800 square feet of restaurant uses. The Project would include subsurface parking. As such, the Project's scale, location, and mixture of land uses would be consistent with the Urban Mixed Use and Urban Residential place types which call for tall, urban buildings, that vertically integrate residential uses and ground floor retail or office uses and subterranean parking near transit as described in the 2016 RTP/SCS.

The Project Site is located within a High Quality Transit Area (HQTA) as defined by SCAG[18] and a Transit Priority Area (TPA) as defined by SB 743, which supports transit opportunities and promotes a walkable environment. The Project Site is well served by public transit as it is located less than 500 feet northwest from the Wilshire/Vermont Metro Rail Station, which serves the Metro Purple Line and the Metro Red Line. The Project Site is also located in close proximity to several bus lines including Metro Lines 18, 51, 52, 201, 204, and 351 and the Wilshire Center/Koreatown DASH line. Additionally, the Project is well served by the existing regional and local road network. The Project Site is 0.95 miles south of U.S. Route 101 (US 101), 1.75 miles west of the Interstate Freeway (I-110), and 1.89 miles north of Interstate 10 (I-10). The Project Site is bounded by Shatto Place on the west, West 6th Street on the south, West 5th Street to the north, and South Westmoreland. As such the Project is highly connected by transit and the regional and local road network.

The 2016 RTP/SCS identifies the HQTAs as appropriate for including high-density development, supporting pedestrian and bike infrastructure, reducing parking requirements, and retaining affordable housing near transit.[19] The Project would promote pedestrian and bicycling activity by developing a Project Site with a mix of uses that would, at the ground floor level, include office and commercial uses, a new public outdoor plaza, and new landscaping along the Project boundaries, particularly along the adjacent sidewalks along West 6th Street and Shatto Place. The Project would also provide 158 bicycle parking spaces, including 141 long-term and 17 short-term spaces.

The Project would restrict 29 (approximately 11 percent) of its proposed 256 units as affordable housing for Extremely Low Income Households. The Project would provide parking that complies with LAMC requirements. In addition, with the approval of the TOC request, the building intensity and density are permitted.

[18] http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf, p. 8.

[19] http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf, p. 25.

Consistency with Criterion 2: Based on total building square footage, the Project contains at least 50 percent residential use, and if Project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.

Table 3-1 shows the proposed land uses, dwelling units, total square feet, FAR, and percentage of use for each site.

TABLE 3-1
PROPOSED LAND USE

Land Use	Units/Square Feet	Percentage of Use
Residential	256 units (29 affordable) 220,437 square feet	93.5%
Commercial	12,800 square feet	5.4%
Office	2,507 square feet	1.1 %
Combined square feet	235,744 square feet	100%
FAR	4.25:1	

As reported in Table 3-1, overall, the Project includes a total floor area of approximately 235,744 square feet of floor area (FAR of 4.25:1) with 93.5 percent dedicated to residential uses. New restaurant uses, totaling up to approximately 12,800 square feet, would be located in the former church structure building, currently being used as a school, that would be repurposed as part of the Project. Approximately 2,507 square feet of ground floor office uses would be included in the new mixed-use building fronting Shatto Place. Residential uses would include approximately 220,437 square feet of floor area and up to 256 dwelling units on 31 floors, including two studios, 150 one-bedroom units, 96 two-bedroom units, and eight three-bedroom units. Of these units, 29 units would be restricted for Extremely Low Income Households. As such, the Project would be consistent with this Criterion 2.

Consistency with Criterion 3: The Project includes a minimum net density of at least 20 dwelling units per acre.

The Project Site consists of a pre-dedicated lot area of approximately 51,236 square feet (1.17 acres). Post dedication and merger, the Project Site would include 56,519 square feet (1.30 acres). Therefore, the Project would provide 256 dwelling units at a density of 197 dwelling units per acre. As such, the Project would be consistent with this Criterion 3.

Consistency with Criterion 4: The Project Site is located within one-half mile of a major transit stop or high-quality transit corridor included in the 2016 RTP/SCS.

A major transit stop is defined 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" and is included in the applicable regional transportation plan (PRC Sections 21064.3 and 21155(b)). A high-quality transit corridor is "[a] corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours" (PRC Section 21155(b)).[20] The City of Los Angeles defines peak hours as between 6 a.m. and 9 a.m. and between 3 p.m. and 7 p.m.[21]

The Project Site is located less than 500 feet from the Metro Wilshire/Vermont Rail Station, which serves the Metro Purple Line and the Metro Red Line and is, therefore, a major transit stop. As discussed above, the Project Site is located within a HQTA defined by SCAG and TPA under SB 743. Since the Project Site is located within 0.5 miles of a major transit stop, it is not required to further demonstrate its proximity to intersecting bus routes or high-quality transit corridors that provide bus service intervals of 15 minutes or less. However, the Project Site is also located in proximity to multiple bus stops with high frequency transit service, as it is serviced by nearby transit lines including DASH Wilshire Center/Koreatown, and regular Metro Lines 18, 51, 52, 201, 204, and 351. While these locations do not provide intersecting bus routes with 15-minute headways or less in the peak hours, with many bus lines serving the Project Site, the Project Site is well served by bus transit access. As such, the Project would be consistent with this Criterion 4.

3.3 Incorporation of Feasible Mitigation Measures, Performance Standards, and Criteria from Prior Applicable EIRs

PRC Sections 21151.2(a) and 21159.28(a) require that a TPP incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs, which for the Project would include the 2016 RTP/SCS Program Environmental Impact Report for Southern California Association of Governments on December 2015 (RTP/SCS PEIR). It is the intent of SCAG that lead agencies and others use the information contained within the PEIR in order to "tier" subsequent environmental documentation of projects in the region.

The Mitigation Monitoring and Reporting Program for the RTP/SCS PEIR (SCAG MMRP) does not include project level mitigation measures that are required to be incorporated into the Project. However, 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 lead agency has

[20] https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=21155. Accessed December 6, 2018.

[21] City of Los Angeles Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines) https://planning.lacity.org/ordinances/docs/toc/TOCGuidelines.pdf.

concluded that a project has the potential to result in significant effects. The City has complied with PRC Sections 21151.2 and 21159.28.

The RTP/SCS PEIR serves as an informational document to inform decision-makers and the public of the potential environmental consequences of approving the proposed Plan. The RTP/SCS PEIR includes mitigation measures designed to help avoid or minimize significant environmental impacts. The RTP/SCS PEIR serves as a first-tier document for later CEQA review of individual projects included in the program.

Project-specific CEQA reviews, including this SCEA document, focus on project-specific impacts and mitigation measures, and need not repeat the broad analyses contained in the PEIR. As discussed by the California Supreme Court, "it is proper for a lead agency to use its discretion to focus a first-tier EIR on only the…program, leaving project-specific details to subsequent EIRs when specific projects are considered" (In re Bay Delta (2008) 43 Cal. 4th 1143, 1174).

The City has reviewed all mitigation measures contained in the RTP/SCS PEIR (and determined their applicability) to the Project. For each such mitigation measure, the City considered whether to use the RTP/SCS PEIR mitigation measure or an equally effective City mitigation measure or federal, State, regional, or City regulation. The City's applicability determination is found on **Table 3-3**, *Project Consistency with 2016–2040 RTP/SCS Mitigation Measures*. As indicated on Table 3-3, the City has incorporated an equally or more effective City mitigation measure or federal, State, regional, or City regulation, or has for other reasons determined that incorporation of the SCAG 2016 RTP/SCS MMRP mitigations measures is not required.

TABLE 3-3
PROJECT CONSISTENCY WITH SCAG 2016-2040 RTP/SCS MITIGATION MEASURES

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Project
Aesthetics		
AES-1: Potential to have a substantial adverse effect on a scenic vista.	**MM-AES-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Use a palette of colors, textures, building materials that are graffiti- resistant, and/or plant materials that complement the surrounding landscape and development. • Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. • Use alternating facades to "break up" large facades and provide visual interest. • Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. • Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. • Retain or replace trees bordering highways, so that clear-cutting is not evident. • Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. • Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions in design of projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.	No mitigation is required. PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2451 states that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within TPA pursuant to CEQA. The Project is a mixed-use, infill project to be developed on a Project Site located in a HQTA and TPA that is located less than 500 from the Metro Rail Wilshire/Vermont light rail station. The Project Site is also located in close proximity to multiple bus routes including Metro bus with high frequency transit service.
AES-2: Potential to substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	No mitigation required.	No mitigation is required. PRC Section 21099, enacted by SB 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Further provisions of SB 743 provide that this legislation "does not affect, change, or modify the

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Project
		authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies (PRC Section 21099(d)(2)(A)), and that aesthetic impacts do not include impacts on historical or cultural resources (Section 21099(d)(2)(B)).
AES-3: Potential to substantially degrade the existing visual character or quality of the site and its surroundings.	**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: • Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. • Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. • Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. • Design projects consistent with design guidelines of applicable general plans. • Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable. • Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.	No mitigation is required. PRC Section 21099, enacted by SB 743, provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Project
AES-4: Potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Potential to result in shade and shadow impacts.	**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: • Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. • Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations. • Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. • Use unidirectional lighting to avoid light trespass onto adjacent properties. • Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. • Provide structural and/or vegetative screening from light-sensitive uses. • Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. • Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. • Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	No mitigation is required. PRC Section 21099, enacted by SB 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment."
Agricultural and Forest Resources		
AF-1: Potential to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.	**MM-AF-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses that are within the jurisdiction and responsibility of the Natural Resources Conservation Service, the California Resources Agency, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Farmland Protection Act and implementing regulations, and the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the Farmland Mapping and Monitoring Program of the California Resources Agency. Such measures may include the following, or other comparable measures identified by the Lead Agency taking into account project and site-specific considerations as applicable and feasible:	No mitigation is required. The Project Site is currently fully developed and is located in a highly urbanized setting, and there is no farmland or agricultural activity on the Project Site or in the vicinity.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Project
	• For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act). • Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. • Maintain and expand agricultural land protections such as urban growth boundaries. Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks. Local governments would be responsible for encouraging the development of agriculture conservation easements or farmland mitigation banks, purchasing conservation agreements or farmland for mitigation, and ensuring that the terms of the conservation easement agreements are upheld. The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see https://www.wildlife.ca.gov/Conservation/Planning/Banking) "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: • Offers landowners economic incentives to protect natural resources; • Saves permittees time and money by providing them with the certainty of pre-approved compensation lands; • Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values; • Provides for long-term protection and management of habitat. • A publicly owned conservation or mitigation bank: • Offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance." 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. • Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. • Include underpasses and overpasses at reasonable intervals to maintain property access. • Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland. • Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities,	

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Project
	as well as policies that provide compensation for property owners if preservation is not feasible. • Contact the California Department of Conservation and each county's Agricultural Commissioner's office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts.	
AF-2: Potential to conflict with existing zoning for agricultural use, or a Williamson Act contract.	**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: • Project relocation or corridor realignment to avoid lands in Williamson Act contracts. • Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection. • Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable.	No mitigation is required. The Project Site is not zoned for agricultural production, there is no farmland at the Project Site, and there are no Williamson Act Contracts in effect for the Project Site.
AF-3: Potential to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).	No mitigation required.	No mitigation is required. The Project Site is currently fully developed and located in an urban environment.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Project
AF-4: Potential to result in the loss of forest land or conversion of forest land to non-forest use.	**MM AF-1(b)** and **MM GHG-3(b)**.	No mitigation is required. The Project Site is currently developed with urban uses, not forest use; therefore, no forest land will be lost or converted to non-forest uses.
AF-5: Potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	**MM AF-1(b)** and **MM GHG-3(b)**.	No mitigation is required. The Project Site is currently fully developed with urban uses, and is not used for any agricultural uses and is not forest land; therefore, no agricultural use or forest land will be converted.
Air Quality		
AIR-1: Potential to conflict with or obstruct implementation of the applicable air quality plan.	No mitigation required.	No mitigation is required.
AIR-2: Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation.	**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. 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: • Minimize land disturbance. • Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. • Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. • Cover trucks when hauling dirt. • Stabilize the surface of dirt piles if not removed immediately. • Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.	The Project would substantially conform to this mitigation measure, as the City would impose the existing regulatory compliance measures listed below on the Project that have been identified by CARB and the South Coast Air Quality Management District (SCAQMD), or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible: • CARB Anti-Idling Air Toxics Control Measure: This measure, codified in Title 13 California Code of Regulations (CCR) Section 2485, applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time, with certain exception for vehicles where idling is a necessary performance activity such as for concrete trucks. • Rule 401 – Visible Emissions: This rule states that a person shall not discharge into the atmosphere from any single source of emission

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Project
	• Minimize unnecessary vehicular and machinery activities. • Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. • On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. • Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy- duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. • Ensure that all construction equipment is properly tuned and maintained. • Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. • Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators. • Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off- peak hours. Minimize obstruction of through traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. • As appropriate, require that portable engines and portable engine- driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. • Implement EPA's National Clean Diesel Program. • Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible. • On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity. • If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines. • Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines. • Convert part of the construction truck fleet to natural gas.	whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view. • Rule 402 – Nuisance: This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. • Rule 403 – Fugitive Dust: This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Dust control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA. • Rule 1113 – Architectural Coatings: This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories. • Rule 1166 – VOC Emissions from Decontamination of Soil: The Project includes MM HAZ-1, which includes features required to comply with this rule. This rule requires ongoing monitoring for soils with VOCs, ongoing testing of soils, the segregation and covering of soils with VOCs, and appropriate removal and disposal of soils with VOCs.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Project
	• Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts. • Fuel all off-road and portable diesel powered equipment with ARB- certified motor vehicle diesel fuel (non-taxed version suitable for use off-road). • Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas. • Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner off-road heavy-duty diesel engines and comply with State off-road regulation. • Use on-road, heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation. • Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary. • Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3-minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit. • Prohibit diesel idling within 1,000 feet of sensitive receptors. • Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors. • The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • The engine size of construction equipment shall be the minimum practical size. • Catalytic converters shall be installed on gasoline-powered equipment. • Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit. • Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite. • Use new or rebuilt equipment. • Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be check by an ASE-certified mechanic and determined to be running in proper condition before it is operated. • Use low rolling resistance tires on long haul class 8 tractor-trailers. • Suspend all construction activities that generate air pollutant emissions during air alerts.	• Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations: This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403). • Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities: The Project would comply with the requirements of this rule if asbestos is found during the renovation and construction activities. With regulatory compliance, the risk related to any existing asbestos-containing building materials (ACBMs) at the Project Site would be reduced to acceptable levels, and the Project would result in no impact with regard to ACBMs. • Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines: The Project emergency generator would comply with the mandated emission limits and operating hour constraints of this rule, including applicable requirements of California Code of Regulations (CCR), Title 17, Section 93115 as incorporated into the rule. In addition to the above regulatory compliance measures, in order to further minimize construction and operational air pollutant emissions, the Project would include a Project Design Feature (PDF) which requires implementation of best management practices to minimize construction-related emissions, as follows: • PDF-AIR-1: Construction equipment operating at the Project Site shall be subject to a number of requirements. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. Construction measures would include, but are not limited to the following: • The Project shall require all off-road diesel equipment greater than 50 horsepower (hp)

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	• Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.	used for this Project to meet USEPA Tier 4 Final off-road emission standards. All equipment shall be outfitted with Best Available Control Technology (BACT) devices, which means including a California Air Resources Board (CARB)-certified Level 3 Diesel Particulate Filter or equivalent. This PDF would allow for a reduction in diesel particulate matter and NOX emissions during construction activities; • All cranes and welders shall be electric-powered; • Forklifts shall be natural gas-powered; • The Project shall utilize low-VOC coatings where commercially available during construction activities to avoid excessive VOC emissions; and • Trucks and other vehicles in loading and unloading queues shall be parked with engines off to reduce vehicle emissions during construction activities. With implementation of CARB and SCAQMD rules and PDF-AIR-1, the Project would minimize construction emissions and would therefore be substantially in conformance with SCAG MM-AIR-2(b).
AIR-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable NAAQS or CAAQS.	No mitigation required.	No mitigation is required.

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AIR-4: Expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially.	**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: • Set technology forcing new engine standards. • Reduce emissions from the in-use fleet. • Require clean fuels, and reduce petroleum dependency. • Work with US EPA to reduce emissions from federal and state sources. • Pursue long-term advanced technology measures. Proposed new transportation-related SIP measures include: *On-Road Sources* • Improvements and Enhancements to California's Smog Check Program • Expanded Passenger Vehicle Retirement • Modifications to Reformulated Gasoline Program • Cleaner In-Use Heavy-Duty Trucks • Ship Auxiliary Engine Cold Ironing and Other Clean Technology • Cleaner Ship Main Engines and Fuel • Port Truck Modernization • Accelerated Introduction of Cleaner Line-Haul Locomotives • Clean Up Existing Commercial Harbor Craft • Limited idling of diesel-powered trucks • Consolidated truck trips and improve traffic flow • Late model engines, Low emission diesel products, engine retrofit technology • Alternative fuels for on-road vehicles *Off-Road Sources* • Cleaner Construction and Other Equipment • Cleaner In-Use Off-Road Equipment • Agricultural Equipment Fleet Modernization • New Emission Standards for Recreational Boats • Off-Road Recreational Vehicle Expanded Emission Standards	The Project would be substantially in conformance with this mitigation measure for the reasons stated below. The City would impose the existing regulatory compliance measures listed therein on the Project that have been identified by CARB and the SCAQMD, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible. In addition to the regulatory compliance measures, in order to further minimize construction and operational air pollutant emissions, the Project would incorporate PDF-AIR-1, described above, which would include implementation of best management practices to minimize construction-related emissions.

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AIR-5: Expose a substantial number of people to objectionable odors.	No mitigation required.	No mitigation is required.
Biological Resources		
BIO-1: Potential to have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	**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 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: • Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. • Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act 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 including the bald eagle: o Avoidance strategies o Contribution of in-lieu fees o Use of mitigation bank credits o Funding of research and recovery efforts o Habitat restoration o Conservation easements o Permanent dedication of habitat o Other comparable measures • Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long- term conservation strategies.	The Project would be substantially in conformance with this mitigation measure for the reasons stated below. The Project Site is an infill site located in an urban area that is currently fully developed with urban uses. The Project Site does not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. There are 12 trees on the Project Site and eight City trees within the Project's right-of-way (five along Shatto Place and three along 6th Street). The Project would remove the 12 existing trees on the Project Site and would provide 64 trees in total for a net increase of 44 trees. Therefore, in order to substantially incorporate the MMs from the RTP/SCS the following Project-specific mitigation measures (MM BIO-1 and MM BIO-2) would be required: **MM BIO-1:** Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. **MM BIO-2:** Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at 213-847-3077. All trees in the public right-of-way shall be provided at a 2 to 1 ratio per the standards of the Urban Forestry Division, Bureau of Street Services, Department of Public Works.

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	• Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources. • Appoint an Environmental Inspector to monitor implementation of mitigation measures. • Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. • Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance. • Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	
BIO-2: Potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations; or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	**MM-BIO-1(b)**. **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 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: • Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act. • Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. • Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California Endangered Species Act, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.	No mitigations are required. The Project is located in a developed, urban area and would be replacing existing school buildings and surface parking. The Project would not be developed on existing open space. Therefore, development of the Project would not result in adverse effects to any riparian habitat or other sensitive habitat that supports any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

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	• Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds. • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season. • Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities. • Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the *Manual of California Vegetation*, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate. • Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. • Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats. • Install fencing and/or mark sensitive habitat to be avoided during construction activities. • Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of temporary disturbance within the project area. • Revegetate with appropriate native vegetation following the completion of construction activities. • Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). • Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	

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BIO-3: Potential to have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	**MM-BIO-1(b)** and **MM-BIO-2(b)**. **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: • Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible. • Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB). • Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: o Permittee-responsible mitigation o Contribution of in-lieu fees o Use of mitigation bank credits • Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether wetlands will be affected and, if necessary, perform a formal wetland delineation.	No mitigations are required. The Project Site is a fully developed urban infill site that is not located on protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies.

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BIO-4: Potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	**MM-BIO-1(b)**, **MM-BIO-2(b)**, and **MM-BIO-3(b)**. **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 polices of counties and cities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur. • Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the Six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. • Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement. • Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. • Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible. • Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area from February 1 through August 31. • Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors. • Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.	The Project would be substantially in conformance with these mitigation measures for the reasons stated below. The Project Site is a fully developed urban infill site 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. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the 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, the Project Site does include ornamental trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Wildlife Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Therefore, in order to substantially incorporate the MMs from the RTP/SCS the following Project-specific mitigation measure would be required: **MM BIO-3:** The Project will result in the removal of vegetation and disturbances to the ground and therefore may result in take of nesting native bird species. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). • Proposed Project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause

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	• 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 CNDDB by a qualified biologist to determine the risk of habitat fragmentation. • Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). • Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible. • Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern. • Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. • Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas. • Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in **MM-BIO-1(b)**, where applicable: o Wildlife movement buffer zones o Corridor realignment o Appropriately spaced breaks in center barriers o Stream rerouting o Culverts o Creation of artificial movement corridors such as freeway under- or overpasses o Other comparable measures • 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,	abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86). • If Project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall: a. Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work. b. If a protected native bird is found, the Project Applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31. c. Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area. d. The Project Applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of

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	seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. • Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species. • Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as they hopscotch across an urban environment, provide connectivity to large-scale habitat areas.	native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the Project.
BIO-5: Potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	**MM-BIO-1(b)**, **MM-BIO-2(b)**, **MM-BIO-3(b)**, and **MM-BIO-4(b)**. **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. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. • Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist. • If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species. • Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. • Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any	The Project would be in substantial conformance with these mitigation measures for the reasons stated below. There are no native tree species within the Project Site that would be subject to the protection of Ordinance No. 177404 of the City of Los Angeles Municipal Code (Section 1. Subdivision 12 of Subsection A of Section 12.21, as amended). However, there are 16 existing non-native, non-protected trees that would be removed as part of the Project. The Project would include a total of 64 trees, including new street trees and trees on the Site. Therefore, in order to substantially incorporate the MMs from the RTP/SCS the following Project-specific mitigation measure would be required: **MM BIO-1** would require that prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way. **MM BIO-2** would require that prior to the removal or planting of any street tree or street in the public right-of-way would require approval and replacement of trees per the requirements of the Board of Public Works. Contact Urban Forestry Division at 213-847-3077. All trees in the public right-of-way shall be provided at a 2 to 1 ratio per the standards of the Urban Forestry Division, Bureau of Street Services, Department of Public Works.

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	time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. • Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. • Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration. • If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. • Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. • Design projects to avoid conflicts with local policies and ordinances protecting biological resources. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: o Avoidance strategies o Contribution of in-lieu fees o Planting of replacement trees at a minimum ratio of 2:1 o Re-landscaping areas with native vegetation post-construction	
BIO-6: Potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	**MM-BIO-1(b)**, **MM-BIO-2(b)**, **MM-BIO-3(b)**, **MM-BIO-4(b)**, and **MM-BIO-5(b)**. **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. Such measures may include the following, or other comparable measures identified by the Lead Agency:	No mitigations are required. The Project Site is not subject to provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not located within or adjacent to an existing Significant Ecological Area.

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	• Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs. • Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in **MM-BIO-1(b)**, where applicable.	
Cultural Resources		
CUL-1: Potential to directly or indirectly destroy unique paleontological resources or sites or unique geological features.	**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. Such measures may include the following, or other comparable measures identified by the Lead Agency: • 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 sites or resources, or to require the substantial alteration of a unique geologic feature. • Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources. • Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible: o All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. o Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique	The Project would be substantially in conformance with this mitigation measure for the reasons stated below. A Paleontological Resources Assessment Report was prepared in July 2018 for the Project which includes a review of the Project's potential for moderate to high sensitivity for paleontological resources. Since Project-related excavation is expected to extend to approximately 60 feet below existing surface, it could encounter paleontological resources below 5 feet and could result in a potentially significant impact to paleontological resources. Therefore, in order to substantially incorporate the MMs from the RTP/SCS, the City has determined that the following mitigation measure is equal to or more effective than SCAG MM-CUL-1(b): **MM GEO-1:** **Retention of a Qualified Paleontologist.** A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP, 2010) (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of excavation and grading during construction, recovery of fossil materials, and reporting as related to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis,

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	paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP. o Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. o Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas. • Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance. • Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.	and shall report to the site in the event potential paleontological resources are encountered. **Construction Worker Paleontological Resources Sensitivity Training**. The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources likely to be encountered within the Project Site and the procedures to be followed if they are found. **Paleontological Resources Monitoring and Plan.** Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use the qualified paleontologist to oversee the implementation of the PRMP. Full-time paleontological resources monitoring shall be conducted for all ground-disturbing activities that exceed 5 feet in depth. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP) under the direction of the Qualified Paleontologist. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified Paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort. If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the

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		discovery location shall cease in a 25-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be salvaged following the standards of the SVP (SVP, 2010) and curated with a certified repository.
CUL-2: Potential to cause a substantial adverse change in the significance of a historical resource, including tribal cultural resources, as defined in CEQA Guidelines Section 15064.5.	**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 [sic] 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 may include the following, or other comparable measures identified by the Lead Agency: • Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified. • Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project. • Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: o Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. o Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources.	The Project would be substantially in conformance with SCAG MM-CUL-2(b), as provided below. Pursuant to CEQA Guidelines Section 15064.5, a Historic Resources Assessment (HRA) Report was prepared for the Project, which satisfies the requirements set forth in SCAG MM-CUL-2(b) to identify if previously evaluated or previously unknown historical resources are present. As discussed in the Project's HRA Report, the former church building on the Project Site was identified by SurveyLA, the citywide historic resources survey, as appearing to be eligible through survey evaluation for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a local Historic-Cultural Monument. The Project's HRA Report re-evaluated the Project site for potential historical significance and determined that the former church building does not appear eligible for designation at the federal, State, or local levels. The Project's HRA Report confirms the SurveyLA conclusion that other school-related buildings on the Project Site are not historically significant. However, because the former church building was identified as eligible for historic designation by SurveyLA, it is treated as a historical resource as defined by CEQA. As discussed in the Project's HRA Report, as the school classroom buildings on the Project Site do not qualify as historical resources, the Project's demolition of these structures would have no impact to historical resources. As analyzed in the Project's HRA Report, the construction of the new mixed-use building and the proposed alternations of the former church building would not impact the historical significance of the former building's Spanish Colonial Revival

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	• Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource. • Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site. • Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified. • Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. • If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. • Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated. • Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources	architecture and the building would remain eligible for historic designation as identified in SurveyLA. In addition, there are two properties in the Project Site vicinity, located at 3109 W. 6th Street and 523 S. Westmoreland Avenue, that were identified as potential historical resources by SurveyLA. The Project's HRA concludes that potential indirect impacts to these resources would be less than significant. During construction of the Project, construction-related vibration has the potential to impact the structural integrity of the former church building, the 3109 West 6th Street and the 523 South Westmoreland Avenue buildings. Therefore, in order to substantially incorporate the MMs from the RTP/SCS, the following project-specific mitigation measures are required: MM-NOISE-4, MM NOISE-5, and MM NOISE-6, the potential for impacts during construction is reduced to less than significant.

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CUL-3: Potential to cause a substantial adverse change in the significance of an archaeological resource, including tribal cultural resources, pursuant to CEQA Guidelines Section 15064.5.	**MM-CUL-2(b)**.	The Project substantially complies with this mitigation measure because the City has determined that the following project-specific mitigation measures are equal to or more effective than the SCAG MM-CUL-2(b): **MM CULT-1:** Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction activities on the Project Site such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The activities to be monitored shall also include off-site improvements in the vicinity of the Project Site that involve ground disturbance, such as utility, sidewalk, or road improvements which would encounter soils that could potentially contain archaeological resources down to a depth of 5-feet. The monitor shall have the authority to direct the pace of construction equipment in areas of higher sensitivity. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older sediments), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified Archaeologist. Prior to commencement of excavation activities, an Archaeological Sensitivity Training shall be given for construction personnel. The training session, shall be carried out by the qualified Archaeologist, will focus on how to identify archaeological resources that may be encountered during earthmoving activities, and the procedures to be followed in such an event. **MM CULT-2:** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A 25-foot buffer shall be established by the qualified

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		Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the qualified Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a "historical resource" pursuant to State CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to PRC Section 21083.2(g), the qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. If any prehistoric archaeological sites are encountered within the project area, consultation with interested Native American parties will be conducted to apprise them of any such findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources. The treatment plan established for the resources shall be in accordance with State CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment under CEQA. If in coordination with the City, it is determined that preservation in place is not feasible, appropriate treatment of the resource shall be developed by the qualified Archaeologist in coordination with the City and may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes. **MM CULT-3:** Prior to the release of the grading bond, the qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact

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		processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Project Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the development and required mitigation measures.
CUL-4: Potential to disturb human remains, including those interred outside of formal cemeteries, including Native American Sacred Sites.	**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: • In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. • If any discovered remains are of Native American origin: o Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. o If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur: ▪ The Native American Heritage Commission is unable to identify a descendent; ▪ The descendant identified fails to make a recommendation; or	The City has determined that the existing regulatory requirements listed below regarding discovery of human remains would apply to the Project and are equal to or more effective than the SCAG MM-CUL-4(b): California PRC Section 5097.98, as amended by Assembly Bill 2641, protects cultural resources and provides procedures in the event human remains of Native American origin are discovered during project implementation. Land owners are required to address the Project's potential impacts to human remains. PRC Section 5097.98 requires notification of the County Coroner in the event of the unanticipated discovery of human remains and a proscribed protocol for their disposition in accordance with applicable regulations, notification of the NAHC and subsequent tribal coordination if remains are determined to be of Native American descent.

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	▪ The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.	
Energy		
EN-1: Potential to increase petroleum and nonrenewable fuel consumption in the regional transportation system.	No mitigation required.	No mitigation is required.
EN-2: Potential to increase residential energy consumption use.	**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: • Integrate green building measures consistent with CALGreen into project design including: o Use energy efficient materials in building design, construction, rehabilitation, and retrofit. o Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. o Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight. o Incorporate passive environmental control systems that account for the characteristics of the natural environment. o Use high-efficiency lighting and cooking devices. o Incorporate passive solar design. o Use high-reflectivity building materials and multiple glazing. o Prohibit gas-powered landscape maintenance equipment. o Install electric vehicle charging stations. o Reduce wood burning stoves or fireplaces. o Provide bike lanes accessibility and parking at residential developments.	The Project substantially conforms with this mitigation measure, because the Project's project design features comply with existing City regulatory requirements. The Project would be constructed to meet or exceed energy standards outlined in the City's Green Building Code, which incorporates the requirements of CALGreen. The Project would also include PDF-GHG-1, which includes energy efficiency features beyond regulatory requirements.

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EN-3: Potential to increase building energy consumption in anticipated development.	**MM-EN-2(b)**.	The Project substantially conforms to this mitigation measure through the Project's design features and regulatory compliance measures. The Project Site will be constructed to meet and would be required to comply with the City's Green Building Code Title 24, which incorporates the requirements of CALGreen. The Project would also include PDF-GHG-1, which includes energy efficiency features beyond regulatory requirements.
EN-4: Potential to increase water consumption and energy use related to water in anticipated development.	No mitigation required.	No mitigation is required.
Geology and Soils		
GEO-1: Potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (ii) strong seismic ground shaking; (iii) seismic related ground-failure, including liquefaction; (iv) landslides.	**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: • 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. • Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site- specific measures have been incorporated into the project design, consistent with the CBC and UBC. • Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas.	The City has determined that the Project already substantially conforms to this mitigation measure, because the Project would be required to comply with the existing seismic design provisions regulations associated with the City of Los Angeles Building Code, which incorporates the 2016 Uniform Building Code (UBC) and 2016 California Building Code (CBC). The 2016 edition of the CBC is based on the 2015 International Building Code (IBC) published by the International Code Council, which replaced the Uniform Building Code. The 2016 CBC contains California amendments based on the American Society of Civil Engineers (ASCE) Minimum Design Standard ASCE/SEI 7-16, Minimum Design Loads for Buildings and Other Structures, provides requirements for general structural design and includes means for determining earthquake loads as well as other loads (such as wind loads) for inclusion into building codes. Furthermore, construction would not exacerbate existing physical conditions pertaining to seismic hazards. Moreover, the Project is subject to regulatory compliance measures, which avoid and/or reduce 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.

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	• Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site- specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.	
GEO-2: Potential to result in substantial soil erosion or the loss of topsoil.	**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: • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site- specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General	The Project substantially conforms with this mitigation measure as it is subject to regulatory compliance measures, such as the preparation of a Wet Weather Erosion Control Plan (WWECP) and a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) permit which are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies, that are capable of avoiding or reducing the Project's potential to result in substantial soil erosion or the loss of topsoil.

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	Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following: o File a Notice of Intent (NOI) with the SWRCB. o 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. o Submit to the RWQCB a copy of the SWPPP and evidence of 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. o After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB. • Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.	
GEO-3: Potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	**MM-GEO-1(b)**.	The Project already substantially conforms to this mitigation measure. As concluded in the Geotechnical Report prepared for the Project, the Project would not contain uses or activities that would exacerbate existing environmental conditions.
GEO-4: Potential to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.	**MM-GEO-1(b)**.	No mitigation is required. As stated in the Geotechnical Report, the Project Site's subsurface materials are generally granular and expected to have a low to moderate potential for expansion. Regardless, the Project would be required to adhere to applicable provisions of the City's Building Code, which would address any potential for expansion. The Project would not contain uses or activities that would exacerbate existing environmental conditions.

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GEO-5: Potential to have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.	No mitigation required.	No mitigation is required.
Greenhouse Gas Emissions		
GHG-1: Potential to directly or indirectly result in an increase in GHG emissions compared to existing conditions (2015).	No mitigation required.	No mitigation is required.
GHG-2: Potential to conflict with SB 375 GHG Emission Reduction Targets.	No mitigation required.	No mitigation is required.
GHG-3: Potential to conflict with AB 32 and or any applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs.	No mitigation required.	No mitigation is required.
GHG Cumulative Impacts	**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 as set forth below, or through comparable measures identified by Lead Agency:	The Project 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. The Project would incorporate the following project design features to reduce energy, conserve water, reduce waste generation, and reduce vehicle travel consistent with statewide strategies and regulations. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions. The Project Site is an infill location close to jobs, off-site housing, and services and in close proximity to

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	• Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision. • Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. • Off-site measures to mitigate a project's emissions. • Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: o Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction; o Use alternative (non-petroleum based) fuels; o Deployment of zero- and/or near zero emission technologies as defined by CARB; o Use lighting systems that are energy efficient, such as LED technology; o Use the minimum feasible amount of GHG-emitting construction materials that is feasible; o Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production; o Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse; o Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy; o Incorporate design measures like WaterSense fixtures and water capture to reduce water consumption; o Use lighter-colored pavement where feasible; o Recycle construction debris to maximum extent feasible; o Protect and plant shade trees in or near construction projects where feasible; and o Solicit bids that include concepts listed above. • Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles. • Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network.	existing and future public transit stops, which would result in reduced VMT, as compared to a project of similar size and land uses at a location without close and walkable access to off-site destinations and public transit stops. Thus, the Project would be consistent with SCAG's 2016–2040 RTP/SCS alignment of transportation, land use, and housing strategies, as the Project would accommodate increases in population, households, employment, and travel demand by implementing smart land use strategies. The Project would also be consistent with applicable City GHG emissions reduction plans, policies, and regulations, including the City's LA Green Plan and the City's Sustainable City pLAn. In addition to consistency with State, regional, and local GHG emission goals and objectives, the Project would be subject to the City's Green Building Code, which incorporates by reference the CALGreen Code, as well as additional City requirements. The following GHG emissions-reducing Project Design Feature (PDF) would be incorporated into the Project: PDF GHG-1: • The Project shall use energy efficient appliances; • The Project shall use low-flow plumbing fixtures; • The Project shall install 141 long-term and 17 short term bicycle parking spaces; • The Project shall utilize drought-tolerant plants in its landscaping; • The Project shall install pre-wiring for EV charging spaces for 20 percent of its parking capacity for future use and; • Of the 20 percent EV parking spaces, 5 percent of the Project's parking capacity will include installed chargers for immediate use by electric vehicles (EV).

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	• Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations. • Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs. • Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles. • Land use siting and design measures that reduce GHG emissions, including: o Developing on infill and brownfields sites; o Building high density and mixed use developments near transit; o Retaining on-site mature trees and vegetation, and planting new canopy trees; o Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and o Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.	

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Hazards and Hazardous Materials		
HAZ-1: Potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	**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: • Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. • Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. • Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials. • Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project. • Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: o The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. o The location of such hazardous materials. o An emergency response plan including employee training information. o A plan that describes the manner in which these materials are handled, transported and disposed. • Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects.	The Project substantially conforms with this mitigation measure as discussed below. A Phase I Environmental Site Assessment (Phase I ESA) dated December 5, 2017 and a Subsurface Investigation Report, dated September 20, 2018 were prepared for the Project. The purpose of the Subsurface Investigation Report was to evaluate the presence of chemicals of concern stemming from historical uses adjacent to the Project Site identified during the Phase I ESA. As indicated in these reports, the Project Site contains contaminated soils below 20 feet that would be removed during excavation. In addition to the applicable SCAG RTP/SCS Mitigation Measures MM-HAZ-1(b), the Project would include Project-specific mitigation measures, MM HAZ-1, MM HAZ-2, and MM HAZ-3 to further reduce potential impacts related to impacted soils, groundwater and vapor intrusion on the Project Site. MM HAZ-1: A Site Specific Soil Mitigation Plan (SMP) will be prepared that will provide guidance to contractors for appropriate handling, screening, and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. These procedures will include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and disposal procedures. The SMP will also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses and schools. In accordance with SCAQMD Rule 1166 requirements, impacted soil removed from the Project Site must comply with the following: • Be transported to an approved treatment/disposal facility. • When loading into trucks is completed, and during transportation, no excavated material

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	• Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. • Avoid overtopping construction equipment fuel gas tanks. • During routine maintenance of construction equipment, properly contain and remove grease and oils. • Properly dispose of discarded containers of fuels and other chemicals.	will extend above the sides or rear of the truck or trailer. • Prior to covering/tarping, loaded impacted soil must be wetted by spraying with dust inhibitors. • The trucks or trailers must be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere. • The exterior of the trucks (including the tires) must be cleaned off prior to the trucks leaving the excavation location and leaving the disposal site before returning to the Project Site. MM HAZ-2: A Groundwater Management Plan (GWMP) will be prepared that includes training and protocol procedures to contractors for avoiding contact with groundwater during excavation and construction of the Project and appropriate disposal protocols of contaminated groundwater. The GWMP will include a requirement for development and implementation of a safety plan to be prepared prior to commencement of construction consistent with Occupational Safety and Health Administration (OSHA) Safety and Health Standards 29 CFR 1910.120 as well as management of groundwater produced through temporary dewatering activities. The safety plan will include necessary training, operating and emergency response procedures, and reporting requirements to regulate all activities that bring workers in contact with potentially contaminated groundwater. In the unlikely event that groundwater contamination occurs, the GWMP will include remedial efforts that may include batch extraction of groundwater using an on-site dewatering system or application of a chemical amendment, such as oxygen or hydrogen source depending on the type of contamination impact. MM HAZ-3: All concrete cuts and utility penetrations into the building pad(s) or concrete slab(s) that underlie the former church building that may occur during the remodeling/repurposing of the existing school building will be sealed to add an additional measure of protection against potential vapor intrusion.

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		Compliance regulatory requirements, SCAG 2016–2040 RTP/SCS Mitigation Measures, and mitigation measures MM HAZ-1, MM HAZ-2, and MM HAZ-3 would ensure no significant construction related impacts related to hazards would occur.
HAZ-2: Potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	**MM-HAZ-1(b)**.	The Project substantially conforms with this mitigation measure. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typical of construction projects. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Also, all construction work would be performed consistent with applicable federal Occupational Safety and Health Administration (OSHA) Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers. However, construction activities or excavation activities could potentially reveal to the presence of unknown hazardous materials in Project Site soil and/or groundwater should such materials be present. With incorporation of Project specific MM-HAZ-1, the Project's impacts would be less than significant. In addition, during construction, all potentially hazardous materials encountered and used at the Project Site would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. This ensures that potential risks associated with construction related activities are minimized. Based on testing conducted for the Project as part of the Subsurface Investigation Report, prepared for the Project, soils beneath the Project Site are considered to be non-hazardous waste when excavated and disposed of during construction activities. However, soils encountered at depths greater than approximately 20 feet below ground surface have evidence of contamination with VOCs. The Project would include MM HAZ-1, listed above that would ensure that the transport and disposal of the contaminated soils removed from the Project

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		Site would not create a significant hazard to the public or the environment. As the majority of the onsite structures were built before the 1978 federal regulations banning the use of asbestos containing building materials (ACBMs) were enacted, there is a potential for the presence of ACBMs in the on-site buildings. If ACBMs are found to be present, they would be abated in compliance with the SCAQMD Rule 1403 and other applicable State and federal rules and regulations. With regulatory compliance, the risk related to any existing ACBMs at the Project Site would be reduced to acceptable levels, and the Project would result in no impact with regard to ACBMs. As the existing onsite buildings were constructed prior to the 1978, federal regulations banning the use of lead-based paints (LBPs). Therefore, there is potential for the presence of LBPs in the onsite buildings. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to Ca/OSHA regulations. With regulatory compliance, the risk related to any existing LBPs at the Project Site would be reduced to acceptable levels, and the Project would result in no impact with regard to LBPs. Groundwater generated during dewatering activities would require treatment prior to discharge to the municipal sewer or stormwater system. As such, the Project would be required to comply with the General National Pollutant Discharge Elimination System (NPDES) requirements and other applicable groundwater water discharge requirements enforced by the Los Angeles Regional Water Quality Control Board (LARWQCB) that ensure that contaminated groundwater removed during construction dewatering is treated prior to discharge to the municipal sewer or stormwater system. In addition, the Project includes MM HAZ-2, to minimize the risk from contact with the contaminated groundwater during construction. There is a low likelihood of a health risk to future employees and visitors to the proposed restaurant uses on the Project Site as a result of vapor intrusion. Even so, the Project includes MM HAZ-3

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		to ensure that the Project's repurposing of the former church building would not result in significant health risk impacts associated with vapor intrusion. The City has determined that, with compliance with applicable regulations and incorporation of the Project specific mitigation measures described above, the Project's potential impacts would be less than significant.
HAZ-3: Potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school.	**MM-HAZ-1(b)**.	The Project substantially conforms with this mitigation measure because the Project includes MM HAZ-1, which requires Project construction activities to comply with SCAQMD Rule 1166 in order to control and minimize the risk associated with excavating, transporting and disposing of potentially impacted or impacted soils that may be encountered at the Project Site. As it is also discussed above, construction of the Project would also involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. With compliance with applicable regulations, construction of the Project would not create a significant risk of exposure to hazardous materials for the public or the environment, including schools.
HAZ-4: Potential to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	**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 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:	No mitigation is required. The Project Site is not currently listed, on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, potential impacts related to soils, groundwater and soil vapor exist on the Project Site. As part of the Phase I ESA, regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the Project Site and properties within the standard search radii. Incorporation of Project specific MM HAZ-1, MM HAZ-2, and MM HAZ-3 and applicable regulatory requirements would ensure potential soils, groundwater and soil vapor hazards would be less than significant.

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	• Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. • Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. • Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. • Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. • Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. • Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. • Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. • Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. • Use best management practices (BMPs) regarding potential soil and groundwater hazards. • Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at	With regulatory compliance, the risk related to any existing ACBMs at the Project Site would be reduced to acceptable levels, and the Project would result in no impact with regard to ACBMs. With regulatory compliance, the risk related to any existing LBPs at the Project Site would be reduced to acceptable levels, and the Project would result in no impact with regard to LBPs.

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	an appropriate off- site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. • Groundwater pumped from the subsurface should be contained on- site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. • Prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. • Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. • If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: 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. • Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. • Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. • Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	

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HAZ-5: Potential for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.	No mitigation required.	No mitigation required.
HAZ-6: Potential for a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.	No mitigation required.	No mitigation is required.
HAZ-7: Potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	**MM-TRA-5(b)**.	The Project substantially conforms to this mitigation measure because the Project would include Project-specific MM TRAF-1, which requires the development of a Construction Management Plan to ensure that adequate emergency access is maintained and that through-access for drivers, including emergency personnel, along all roads would still be provided during construction. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project Site access and circulation plans would be subject to review and approval by the Los Angeles Fire Department (LAFD).

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HAZ-8: Potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	**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: • Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures would be applied to eaves, vents, windows, and doors to avoid any gaps that would allow intrusion by flame or embers. • Adhere to the Multi-Jurisdictional Hazards Mitigation Plan, as well as local general plans, including policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training, sustainable development, brush management, and public outreach. • Encourage the use of fire-resistant vegetation native to Southern California and/or to the local microclimate (e.g., vegetation that has high moisture content, low growth habits, ignition-resistant foliage, or evergreen growth), eliminate brush and chaparral, and discourage the use of fire-promoting species especially non-native, invasive species (e.g., pampas grass, fennel, mustard, or the giant reed) in the immediate vicinity of development in areas with high fire threat. • Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of non-native, invasive species to promote healthy, natural ecosystem regrowth. Native vegetation is more likely to have deep root systems that prevent slope failure and erosion of burned areas than shallow-rooted non-natives. • Submit a fire safety plan (including phasing) to the Lead Agency and local fire agency for their review and approval. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase. • Utilize Fire-wise Land Management by encouraging the use of fire- resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat. • Promote Fire Management Planning that would help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts. • Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat.	No mitigation required. The Project Site is located in a fully urbanized area and there are no wildlands in the vicinity, and is not near a wildland fire hazard.

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Hydrology and Water Quality		
HYD-1: Potential to violate any water quality standards or waste discharge requirements.	**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: • Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. • Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. • Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. • Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. • Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. • Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: o U.S. Army Corps of Engineers (Corps): Section 404. Permit approval from the Corps should be obtained for the placement of dredge or fill material in Waters of the U.S., if any, within the interior of the project site, pursuant to Section 404 of the federal Clean Water Act. o Regional Walter Quality Control Board (RWQCB): Section 401 Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above. o California Department of Fish and Wildlife (CDFW): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires authorization from CDFW. • Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. • Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution	The Project substantially conforms with this mitigation measure because the Project is subject to regulatory compliance measures that are capable of avoiding or reducing the potential impacts on water quality. The Project would comply with 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. In addition, to minimize potential hazards associated with potentially impacted or impacted soils and related to contacting contaminated groundwater during construction, the Project would include MM HAZ-1 and MM HAZ-2. MM HAZ-1 would include requirements that would ensure that potentially impacted or impacted soils would be identified, properly handled and properly transported off-site to a landfill qualified to receive them. MM HAZ-2 would include the development of a Groundwater Management Plan (GWMP), which would include training and protocol procedures for contractors to avoid contact with groundwater during excavation and construction of the Project. The GWMP will include a requirement for development and implementation of a safety plan to be prepared prior to commencement of construction consistent with Occupational Safety and Health Administration (OSHA) Safety and Health as well as management of groundwater produced through temporary dewatering activities. The safety plan will include necessary training, operating and emergency response procedures, and reporting requirements to regulate all activities that bring workers in contact with potentially contaminated groundwater. In the unlikely event that groundwater contamination occurs, the GWMP will include remedial efforts that may include batch extraction of groundwater using an on-site dewatering system or application of a chemical amendment, such as oxygen or hydrogen source depending on the type of contamination impact.

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	of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. • Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies. • Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. • Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. • Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. • Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters. • Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel. • Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. • Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible. • If a proposed project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out.	

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HYD-2: Potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).	**MM-HYD-2(b):** Consistent with the provisions of the Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. Where the Lead Agency has 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: • For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. • Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. • Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	The Project substantially conforms with this mitigation measure, because the Project Site is located in an urbanized area that does not contain any significant groundwater recharge areas. Continual dewatering during operation of the Project would not occur. During construction of the Project, temporary dewatering could be necessary. However, construction-related dewatering activities would be temporary in nature and would not be of such an extent that would substantially alter groundwater supplies.
HYD-3: Potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on or off site.	**MM-HYD-1(b)**.	The Project substantially conforms to this mitigation measure, because the Project is required to comply with the following regulatory requirements: The Project construction would comply with applicable NPDES and City requirements including those requiring the preparation of a Project-specific Stormwater Pollution Prevention Plan (SWPPP). Further, pursuant to the City's LID Ordinance, the Project would be required to capture and manage the first three-quarters of an inch of runoff flow during storm events as defined in the City's BMPs. The bio-filtration flow-through planters would meet the City of Los Angeles' stormwater capture and reuse criteria and LID design standards.

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HYD-4: Potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site.	**MM-HYD-1(b)**.	The Project substantially conforms to this mitigation measure because the Project is required to comply with the following regulatory requirements: the City of Los Angeles's Low Impact Development (LID) design standards, the City of Los Angles Development Best Management Practices Handbook, the Los Angeles Regional Water Quality Control Board requirements, and the National Pollution Discharge Elimination System permit requirements. Because there are no waterbodies within or near the Project Site, flooding is not expected to occur on- or off-site.
HYD-5: Potential to substantially create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or providing substantial additional sources of polluted runoff.	**MM-HYD-1(b)**.	The Project substantially conforms to this mitigation measure because the Project is required to comply with the following regulatory requirements contained in LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. Project's design would increase the Project Site's permeability and would, thus, decrease surface water runoff. Dewatering, treatment, and disposal of groundwater would be conducted in accordance with permitted requirements set forth by the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. In addition, the Project would include appropriate on-site drainage improvements to accommodate anticipated stormwater flows.
HYD-6: Potential to otherwise substantially degrade water quality.	**MM-HYD-1(b)**.	The Project substantially conforms to this mitigation measure, because the Project is required to comply with regulatory requirements, thus, water quality impacts associated with construction and operation of the Project would be less than significant. Therefore, the City has determined that the Project's impacts would be less than significant and no mitigation is required.

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HYD-7: Potential to place housing within a 100-year flood hazard area as mapped on a federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map.	No mitigation required.	No mitigation is required.
HYD-8: Potential to place within a 100-year flood hazard area structures that would impede or redirect flood flows.	**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: • Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program. • Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	No mitigation is required. The Project Site is located in an urbanized area and is not within a 100-year floodplain hazard area, or at risk due to levee or dam failure, seiche, tsunami, or mud flow.

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HYD-9: Potential to expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.	**MM-HYD-8(b**).	No mitigation required. The Project Site is located in an urbanized area and is not within a 100-year floodplain hazard area. Further, the Project Site is not located within a potential inundation area, or at risk due to levee or dam failure, seiche, tsunami, or mud flow. The Project Site is located in a flat urban area, approximately 12 miles east of the Pacific Ocean and is not shown to be located within a tsunami hazard area in the Los Angeles General Plan Safety Element. The Project Site is not located within the proximity of a reservoir, dam, or enclosed body of water. The nearest enclosed body of water is MacArthur Park Lake, located 0.73 miles southeast of the Project Site and surrounded by intervening development. The Project Site is also at a higher elevation (272 feet above mean sea level [MSL]) than MacArthur Lake (260 feet MSL), and therefore, the Project Site is not downstream of the water body.
HYD-10: Potential for inundation by seiche, tsunami, or mudflow.	**MM-HYD-8(b)**.	No mitigation is required. The Project Site is located in an urbanized area and is relatively flat. The Project Site is not within a 100-year floodplain hazard area. Further, the Project Site is not located with a potential inundation area, or at risk due to levee or dam failure, seiche, tsunami, or mud flow. The Project Site is located in a flat urban area, approximately 12 miles east of the Pacific Ocean and is not shown to be located within a tsunami hazard area in the Los Angeles General Plan Safety Element. The Project Site is not located within the proximity of a reservoir, dam, or enclosed body of water. The nearest enclosed body of water is MacArthur Park Lake, located 0.73 miles southeast of the Project Site and surrounded by intervening development. The Project Site is also at a higher elevation than MacArthur Lake, and therefore, the Project Site is not downstream of the water body.

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Land Use and Planning		
LU-1: Potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	**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: • 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.	No mitigation is required. The existing General Plan Land Use designation is Community Commercial. No zone change or general plan amendment has been requested. Pursuant to the voter-approved Measure JJJ of the Los Angeles Municipal Code (LAMC), Section 12.22-A.31 was added to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program. The TOC Affordable Housing Incentive Program guidelines provide for eligibility standards, incentives, and other necessary components for all housing developments that provide a minimum number of On-Site Restricted Affordable Units and that are located within a 0.5-mile radius of a Major Transit Stop. LAMC Section 12.22-A.31 provides for Base and Additional Incentives for projects in lots based on the proximity of Major Transit Stops and classifies these lots into specific Tiers. Per the TOC Tier 4 guidelines, the Project Site is permitted increased density, an increased FAR, reduced parking requirements, reduced yard requirements, and reduced open space requirements. The Project would be consistent with the Tier 4 requirements of LAMC Section 12.22-A.31 as it is located within 750 feet of a train line or rapid bus stop and it would set aside 11 percent of the total number of its residential units (29 units of the 256 units) as affordable for Extremely Low Income households. The Project would be also consistent with the policies and objectives of the Los Angeles Framework Element, Los Angeles General Plan Housing Element, Los Angeles General Plan Mobility Plan 2035, Los Angeles General Plan Noise Element, the City Planning Commission's Do Real Planning document, the SCAG's 2016 RTP/SCS, and the Wilshire Community Plan. The Project proposes a residential and commercial mixed-use project within close proximity to a variety of public transit options. The Project would include residential, commercial, and office uses that would provide much needed

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		housing, business, and job opportunities in a transit friendly location. Therefore, the Project is consistent with goals and policies to contained within these plans that aim to provide new housing, including affordable housing, improve the pedestrian environment, support mixed use development near transit, improve air quality and active transportation (e.g., bicycling and walking), and encourage new high quality development that is compatible with existing uses and development.
LU-2: Potential to physically divide an established community.	**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: • Consider alignments within or adjacent to existing public rights-of-way. • Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. • Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). • Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods. • Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: o Alignment shifts to minimize the area affected. o Reduction of the proposed right-of-way take to minimize the overall area of impact. o Provisions for bicycle, pedestrian, and vehicle access across improved roadways. • Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project. • Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities.	No mitigation is required. The Project would not cause any permanent street closures or block access to any surrounding land use. Since the Project would be developed within a long-established developed urban area along an existing street grid system, the Project would not physically divide an established community by creating new streets or by blocking or changing the existing street grid pattern.

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LU-3: Potential to conflict with any applicable habitat conservation plan or natural community conservation plan.	**MM-BIO-1(b)**, **MM-BIO-2(b)**, **MM-BIO-3(b)**, **MM-BIO-4(b)**, **MM-BIO-5(b)**, and **MM-BIO-6(b)**.	No mitigation is required. The Project Site is not subject to provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not located within or adjacent to an existing Significant Ecological Area.
Mineral Resources		
MIN-1: Potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.	**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: • Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. • Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures: o Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. o 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. o 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. o Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	No mitigation is required. The Project Site is fully developed and no oil wells are present. There are no oil extraction operations and drilling or mining of mineral resources at the Project Site, nor is the Project Site within an area identified for such uses.

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MIN-2: Potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.	**MM-MIN-1(b)**.	No mitigation is required. No oil extraction operations and drilling or mining of mineral resources exist at the Project Site, nor is the Project Site within an area identified as a locally important mineral resource recovery site that has been delineated on a local general plan, specific plan or other land use plan.
Noise		
NOISE-1: Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	**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: • Install temporary noise barriers during construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. • Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices. • Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels. • Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. • Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.	The Project would substantially conform to this SCAG mitigation measure as the City is required to comply with regulatory control measures in LAMC Section 41.40 and Section 112.05, which regulate noise from construction activities, in City of Los Angeles Building Regulations Ordinance No. 178,048, which require a construction site notice to be provided, in LAMC Section 112.02, which require 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, and in LAMC Section 114.03, which prohibit loading/unloading activities within 200 feet of any residential building between the hours of 10:00 p.m. and 7:00 a.m. of the following day. In addition to the above regulatory compliance measures, in order to further minimize construction and operational noise, the Project would include PDFs, which include the implementation of specific requirements and best management practices to minimize Project-related noise. The PDFs are as follows: **PDF-NOISE-1:** The Project will limit construction and demolition to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays or holidays (City observed). **PDF-NOISE-2:** The Project will not require or allow the use of impact pile drivers. **PDF-NOISE-3:** The Project will not allow any delivery truck idling for more than 5 consecutive minutes in the loading area pursuant to State regulation (Title 13 California Code of Regulations [CCR], Section 2485). Signs will be posted in

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	• Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. • Designate an on-site construction complaint and enforcement manager for the project. • Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. • Ensure that construction equipment is not idle for an extended time in the vicinity of noise-sensitive receptors. • Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors. • Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive receptors to the maximum extent feasible. • Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way. • Use noise barriers to protect sensitive receptors from excessive noise levels during construction. • Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls. • Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. • Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. • Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.	delivery loading areas specifying this idling restriction. **PDF-NOISE-4:** The Project will not require or allow operation of any amplified sound system in the outdoor areas except for downward or inward facing speakers playing background music that will be confined to the outside ground-level dining patio along West 6th Street and the amenity decks on level two, 30, and 31. Furthermore, the Project would implement the following mitigation measures to reduce construction and operational noise to less-than-significant levels. The mitigation measures are as follows: **MM NOISE-1:** The Project shall implement construction noise reduction strategies to reduce noise levels from construction affecting the noise-sensitive residential receptors located to the east of the Project Site, with a performance standard of achieving a construction noise level of less than 66 dBA Leq at the noise-sensitive residential receptors adjacent to the east of the Project Site. The noise reduction strategies shall include one or a combination of the following to achieve the performance standard. • Use construction equipment, fixed or mobile, that individually generates less noise than presumed in the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). Examples of such equipment are medium, compact, small, or mini model versions of backhoes, cranes, excavators, loaders, or tractors; or newer model equipment; or other applicable equipment that are equipped with reduced noise-generating engines. Construction equipment noise levels shall be documented based on manufacturer's specifications. The construction contractor shall keep construction equipment noise level documentation on-site for the duration of Project construction. • Noise-generating equipment operated at the Project Site shall be equipped with California industry standard noise control devices to effectively reduce noise levels, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no

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		additional noise, due to worn or improperly maintained parts, would be generated. The reduction in noise level from noise shielding and muffling devices shall be documented based on manufacturer's specifications. The construction contractor shall keep noise shielding and muffling device documentation on-site and documentation demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications on-site for the duration of Project construction. • Construction and demolition activities shall be scheduled so as to minimize or avoid operating multiple heavy pieces of equipment such as a large dozer, concrete saw, and excavator, simultaneously at the perimeter of the Project Site along the eastern boundary of the Project Site. • The Project shall provide temporary minimum 8-foot-tall construction noise barriers along property lines facing adjacent off-site residential buildings to the east and northeast. The temporary barriers shall at a minimum remain in place during early Project construction phases (up to the start of framing) when the use of heavy equipment is prevalent. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel. • The Project shall offer noise mitigation measures to the residential units located directly adjacent to the eastern boundary of the Project Site for those residential units in which the temporary construction noise barrier would not block the line-of-sight between the construction equipment and the residential unit windows facing the Project Site. These mitigation measures may include installation of temporary vertical sheeting at noise-sensitive points, such as residential unit windows facing the Project Site, to provide noise attenuation.

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		• The Project shall stage noise-generating construction equipment as far away from the noise-sensitive receptors adjacent to the east of the Project Site as practicable; minimize the number of noise-generating construction equipment in simultaneous use; and/or provide other noise-reducing techniques. The effectiveness of the noise reduction strategies to achieve the performance standard shall be documented by on-site noise monitoring conducted by a qualified acoustical analyst using a Type 1 instrument in accordance with the American National Standards Institute (ANSI) S1.4. Noise monitoring shall be conducted during early Project construction phases when the use of heavy equipment is prevalent. **MM NOISE-2:** The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the Project Site. Signs shall also be posted at the Project Site that include permitted construction days and hours. **MM NOISE-3:** The Project shall install a sound enclosure or equivalent noise attenuation measures for the Project's operational emergency generators that shall provide a minimum noise reduction of 15 dBA. The generator would generate noise levels of approximately 81 dBA (Leq) at 25 feet with the noise attenuation measures. At Plan Check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure. The City has determined that, with compliance with City regulatory requirements, incorporation of PDF-NOISE-1 through PDF-NOISE-4, and implementation of mitigation measures MM-NOISE-1 through MM-NOISE-3, the Project would minimize its construction and operational noise effects. As a result, the City has determined that the Project's noise impacts would be less than significant, and that the Project would therefore minimize its effects substantially in conformance with SCAG MM-NOISE-1(b).

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NOISE-2: Result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	**MM-NOISE-1(b)**. **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 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: • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. • For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. • 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.	The Project would substantially conform to these mitigation measures for the reasons set forth below. In order to minimize vibration levels, the Project would include a PDF, which includes the implementation of specific requirements and best management practices to minimize vibration. The PDF is as follows: **PDF-NOISE-2:** The Project will not require or allow the use of impact pile drivers and will not require or allow blasting during construction activities. Furthermore, the Project would implement the following mitigation measures to reduce vibration to less-than-significant levels. The mitigation measures are as follows: **MM NOISE-4:** The Project shall implement construction vibration reduction strategies to reduce vibration levels from construction affecting vibration-sensitive receptors to the east of the Project Site, with a performance standard of achieving a construction vibration level of less than 0.5 inches per second PPV at the face of the on-site former church building, less than 0.3 inches per second PPV at the face of the 3109 West 6th Street building and the 523 South Westmoreland Avenue building, and 72 VdB or less at occupied vibration-sensitive residential receptors adjacent to the east of the Project Site. Vibration reduction strategies shall include one or a combination of the following to achieve the performance standards: • Use construction equipment, fixed or mobile, that individually generates less vibration than presumed in the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual. Examples of such equipment are medium, compact, small, or mini model versions of bulldozers, drills, or trucks; or newer model equipment with lower vibration levels; or other applicable equipment that are equipped with reduced vibration-generating engines. Construction equipment vibration levels shall be documented based on manufacturer's specifications or other equipment or testing documentation. The construction contractor shall keep construction equipment vibration level

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		documentation on-site for the duration of Project construction. • Prior to obtaining a building permit, the effectiveness of the vibration reduction strategies to achieve the performance standard shall be documented in a vibration study conducted by a qualified acoustical/vibration engineer based on detailed Project plans for Plan Check. **MM NOISE-5:** Prior to construction, the Applicant shall retain the services of a qualified acoustical/vibration engineer to review the proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the on-site former church building, the 3109 West 6th Street building, and the 523 South Westmoreland Avenue building. The Applicant and qualified acoustical/vibration engineer shall conduct a pre-construction survey that visually identifies the existing conditions of the on-site former church building, the 3109 West 6th Street building, and the 523 South Westmoreland Avenue building. During construction, the contractor shall install and maintain at least one continuously operational automated vibrational monitors on the on-site former church building, the 3109 West 6th Street building, and the 523 South Westmoreland Avenue building. The monitors shall be capable of being programmed with two predetermined vibratory velocities levels: • On-site former church building: a first-level alarm equivalent to a 0.48 inches per second PPV at the face of the on-site former church building and a regulatory alarm level equivalent to 0.5 inches per second PPV at the face of the on-site former church building. • 3109 West 6th Street building and the 523 South Westmoreland Avenue building: a first-level alarm equivalent to a 0.28 inches per second PPV at the face of the 3109 West 6th Street building and the 523 South Westmoreland Avenue building and a regulatory alarm level equivalent to 0.3 inches per second PPV at the

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		face of the 3109 West 6th Street building and the 523 South Westmoreland Avenue building. The monitoring system shall produce real-time specific alarms (for example, via text message and/or email to on-site personnel) when velocities exceed either of the predetermined levels. In the event of a first-level alarm, feasible steps to reduce vibratory levels shall be undertaken, including but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the event of an exceedance of the threshold level, the contractor shall review the construction work in the vicinity and investigate construction methods that would reduce vibration levels in the vicinity. If it is determined that the construction work is causing an exceedance of the vibration threshold level, the contractor shall also visually inspect the on-site former church building, the 3109 West 6th Street building, and the 523 South Westmoreland Avenue building for damage. Results of the inspection shall be logged. In the event damage occurs to finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant, and if warranted, in a manner that meets the Secretary of the Interior's Standards. **MM NOISE-6:** Prior to the issuance of grading permits, the Applicant will provide a shoring plan prepared by a qualified structural engineer who meets the relevant Secretary of the Interior's Professional Standards, for review and approval by the City of Los Angeles. The shoring plan will ensure the protection of the on-site former church building on the Project Site, as well as the potential historic resources adjacent to the Project Site at 3109 West 6th Street and 523 South Westmoreland Avenue, during construction.
NOISE-3: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	**MM-NOISE-1(b)**.	The Project substantially conforms to this mitigation measure for the reasons stated above.

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NOISE-4: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	**MM-NOISE-1(b)**.	The Project substantially conforms to this mitigation measure as stated above.
NOISE-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in the exposure of people residing or working in the project area to excessive noise levels.	No mitigation required.	No mitigation is required.
NOISE-6: For a project within the vicinity of a private airstrip, result in the exposure of people residing or working in the project area to excessive noise levels.	No mitigation required.	No mitigation is required.
Population, Housing, and Employment		
PHE-1: Potential to induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	**MM-LU-1(b)**.	No mitigation is required. The Project would provide infill replacement development within a currently developed urban setting. It would not add new infrastructure beyond that required to connect the Project to existing utility lines, and adjacent roadways. Therefore, the Project would not open new areas to development; or promote development in an area not otherwise expected to be developed. The Project's 256 residential units are estimated to result in an increase of the residential population of approximately 622 residents. As the Project would replace existing school uses with new restaurant and office employment, the Project would result in a net increase of 20 employees. The Project's estimated housing, population, and employment growth would be within the estimated growth projections for 2021 (Project buildout year), and SCAG's 2040 growth projections based on the SCAG 2016 RTP/SCS, and

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		would occur on a Project Site located within a HQTA and TPA.
PHE-2: Potential to displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere.	**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: • Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. • Prioritize the use existing ROWs, wherever feasible. • Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.	The Project Site is currently developed with school uses and does not contain any existing housing. Therefore, development of the Project would not displace any existing housing and would not require construction of replacement housing.
PHE-3: Potential to displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	**MM-PHE-2(b)**.	No mitigation is required. The Project Site is currently developed with school uses and does not contain any existing residential uses.
Public Services		
PS-1: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection and	**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)**. **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	See above regarding AES-1, AES-3, AES-4, AF-1, AF-2, BIO-1 through BIO-3, CUL1 through CUL-4, GEO-1, and HYD-1, and below regarding USS-3, USS-4 and USS-6. The Project substantially conforms to this mitigation measure because the Project would also be subject to compliance with fire protection design standards, as necessary, per the California Building Code, California Fire Code, the City of Los Angeles Municipal Code and the Los Angeles Fire Department (LAFD), to ensure adequate fire protection. In addition, the City of Los Angeles requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire

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emergency response services.	measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible: • Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements. • During project-level review of government facilities projects, require implementation of Mitigation Measures 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.	access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the LAFD. The Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the Project such that it would require construction of new fire facilities. Even if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the Project area is highly developed, and the site of a fire station or expansion of a fire station would likely be on an infill lot that would likely be less than an acre in size.
PS-2: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public protective security services.	**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)**, **MMCUL-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)**. **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, taking in to account project and site-specific considerations as applicable and feasible, including: • 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. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel. • During project-level review of government facilities projects, require implementation of Mitigation Measures 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	See above regarding AES-1, AES-3, AES-4, AF-1, AF-2, BIO-1 through BIO-3, CUL1 through CUL-4, GEO-1, and HYD-1, and below regarding USS-3, USS-4 and USS-6. The Project substantially conforms to this mitigation measure because the Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios. In addition, in order to substantially incorporate the MMs from the RTP/SCS the Project would include the following Project specific mitigation measures: **MM PS-1:** A construction fence will be constructed around the Project Site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances. **MM PS-2:** The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through

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	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.	Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits. MM PS-3: Prior to the occupancy of the Project, the Applicant will provide the Olympic Area Commanding Officer with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.
PS-3: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools services.	**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)**. **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: • Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable. • During project-level review of government facilities projects, require implementation of Mitigation Measures 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.	No mitigation is required. None of the schools serving the Project Site is overcrowded, and there is capacity in all six schools serving the Project Site. Furthermore, since payment of appropriate school fees to LAUSD is required by law and is considered to be full mitigation.

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Recreation		
REC-1: Potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	**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: • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: o Increasing the accessibility to natural areas for outdoor recreation. o Promoting infill development and redevelopment to revitalize existing communities. o Utilizing “green” development techniques. o Promoting water-efficient land use and development. o Encouraging multiple uses. o Including trail systems and trail segments in General Plan recreation standards. • Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the HQTA. • Where construction or expansion of recreational facilities is included in the project or required to meet public park service ratios, require implementation of Mitigation Measures 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	No mitigation is required. The Project would provide 21,450 square feet of credited open space, and would be compliant with open space requirements. The Project would also provide an additional 42,775 square feet of uncredited exterior and interior private open space which would include a ground floor plaza, private terraces, gym/fitness room, community room, and swimming pool. The Project applicant would be responsible for meeting any parkland dedication or fee requirements pursuant to the Quimby Act and applicable LAMC requirements, as necessary.

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	water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	
REC-2: Potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	**MM-REC-1(b)**.	No mitigation is required. The Project would provide 21,450 square feet of credited open space, and would be compliant with open space requirements. The Project would also provide an additional 42,775 square feet of uncredited exterior and interior private open space which would include a ground floor plaza, private terraces, gym/fitness room, community room, and swimming pool. These recreational amenities would help relieve stress on the City's existing park and recreational system. The Project does not include, nor would it necessitate, a park or public recreational facility component, the construction of which could have an adverse environmental impact.
Transportation		
TRA-1: Potential to conflict with the established measures of effectiveness for the performance of the circulation system, by increasing the daily VMT, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	**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: • Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation. • Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides. • Provide a vanpool for employees. • Fund capital improvement projects to accommodate future traffic demand in the area. • Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including:	The Project already substantially conforms to this mitigation measure because based on the Transportation Impact Study prepared for the Project by Gibson Transportation in October 2018, construction and operation of the Project would have a less-than-significant impact on the street system in the vicinity of the Project. The Project Applicant would be required to submit formal construction staging and traffic control plans for review and approval by LADOT prior to the issuance of any construction permits. Therefore, in order to substantially incorporate the MMs from the RTP/SCS the Project would include a Project specific mitigation measures (MM TRAF-1) that would require the preparation of a Construction Management Plan. MM TRAF-1 is as follows: **MM-TRAF-1:** The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate: • Requiring workers and construction trucks to generally travel outside of the peak hours

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	o Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement; o Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document); o 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; o Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan; o Direct transit sales or subsidized transit passes, Guaranteed ride home program; o Pre-tax commuter benefits (checks); o On-site car-sharing program (such as City Car Share, Zip Car, etc.); o On-site carpooling program; o Distribution of information concerning alternative transportation options; o Parking spaces sold/leased separately; and o Parking management strategies, including attendant/valet parking and shared parking spaces. • Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride- sharing, and designating adequate passenger loading and unloading and waiting areas. • Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible. • Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services. • Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work. • Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs. • Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower- emitting vehicles. • Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions.	• Prohibition of construction worker parking on nearby residential streets • Temporary traffic control during all construction activities encroaching on public rights-of-way to improve traffic flow and safety on public roadways • Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets • Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate • Scheduling of construction-related deliveries so as to generally occur outside the commuter peak hours • Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety. To further reduce any construction related conflicts near schools, the following Project specific mitigation measures are included: **MM TRAF-2:** There shall be no staging or parking of construction vehicles, including vehicles to transport workers on any of the streets adjacent to the school. **MM TRAF-3:** LADBS shall assign specific haul route hours of operation based upon Young Oak Kim Academy's hours of operation. **MM TRAF-4:** Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus. **MM TRAF-5:** The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead

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	• Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles. • Purchase, or create incentives for purchasing, low or zero-emission vehicles. • Create local "light vehicle" networks, such as neighborhood electric vehicle systems. • Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles. • Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles. • Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives. • Project Selection: o Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. o Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints. • Public Involvement: o Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community members and other stakeholders, especially to those traditionally underserved by transportation services. • Transit and Multimodal Impact Fees: o Assess transit and multimodal 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. • System Monitoring: o Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency. • Arterial Traffic Management: o Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. • Signal Synchronization:	protection, due to sidewalk closure or blockage, at all times. Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account. Thus, with the Project's incorporation of MM TRAF-1, MM TRAF-2 MM TRAF-3, MM TRAF-4, and MM TRAF-5, construction of the Project would not result in a significant impact to the performance of the circulation system.

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	o Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic. • HOV Lanes: o Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions. • Delivery Schedules: o 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. o Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives. • Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities. • Bicycle and Pedestrian Trails: o Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations. • Bicycle Safety Program: o Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers. • Bicycle and Pedestrian Project Funding: o Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects. • Bicycle Parking: o Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists). • Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following: o Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation; o Eliminate or reduce minimum parking requirements for new buildings;	

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	o "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space); o Use parking pricing to discourage private vehicle use, especially at peak times; o Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities; o 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; o Encourage shared parking programs in mixed-use and transit-oriented development areas. • Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: o Promote the use of peripheral parking by increasing on- site parking rates and offering reduced rates for peripheral parking; o Encourage special event center operators to advertise and offer discounted transit passes with event tickets; o 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; o Promote the use of bicycles by providing space for the operation of valet bicycle parking service. • Parking "Cash-out" Program: o Require new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use. • Pedestrian and Bicycle Promotion: o Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation. • Fleet Replacement: o 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.	

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TRA-2: Potential to conflict with an applicable congestion management program, including, but not limited to, VMT and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways	**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: • Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: o Advocate for a regional, market-based system to price or charge for auto trips during peak hours. o Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation. o 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. o 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. o Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay. • Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency: o 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	As described in the MM-TRA-2(b), this mitigation measure is applicable if the Lead Agency has identified that a project has the potential for significant effects related to congestion management. Project impacts related to congestion management would be less than significant and this mitigation measure is not required. Nevertheless, to reduce any potential impacts related to construction, Project specific mitigation measures, MM TRAF-1, MM TRAF-2, MM TRAF-3, MM TRAF-4, and MM TRAF-5 described above would be incorporated.

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	closure procedures, signs, cones for drivers, and designated construction access routes. o Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur. o Location of construction staging areas for materials, equipment, and vehicles at an approved location. o 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. o Provision for accommodation of pedestrian flow. o As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces. o 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 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. o Any heavy equipment brought to the construction site shall be transported by truck, where feasible. o No materials or equipment shall be stored on the traveled roadway at any time. o Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion. o All equipment shall be equipped with mufflers. o 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. o Promote “least polluting” ways to connect people and goods to their destinations. • Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency: o Ensure transportation centers are multi-modal to allow transportation modes to intersect.	

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	o 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. o To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges. o Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations. o Coordinate schedules and routes across service lines with neighboring transit authorities. o Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles). o 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. o 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. o Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets. o Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible. • Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including: o Ensure transit stops and bus lanes are safe, convenient, clean and efficient. o Ensure transit stops have clearly marked street-level designation, and are accessible. o Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate. o 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. • Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including: o Develop a Regional Pass system to reduce the number of different passes and tickets required of system users. o Implement "Smart Bus" technology, using GPS and electronic displays at transit stops to provide customers with "real-time" arrival and departure time information	

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	(and to allow the system operator to respond more quickly and effectively to disruptions in service). o Investigate the feasibility of an on-line trip-planning program. • Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including: o Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic. o Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access. • Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including: o Designate a certain percentage of parking spaces for ride-sharing vehicles. o Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles. o Provide a web site or message board for coordinating shared rides. o Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit. o Hire or designate a rideshare coordinator to develop and implement ridesharing programs. • Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including: o Provide assistance to regional and local ridesharing organizations. o Advocate for legislation to maintain and expand incentives for employer ridesharing programs. o Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes. o Provide public recognition of effective programs through awards, top ten lists, and other mechanisms. • Implement a “guaranteed ride home” program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program. • Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations. • Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers. • Work with existing shuttle service providers to coordinate their services.	

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	• Facilitate employment opportunities that minimize the need for private vehicle trips, including: o Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations. o Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate. • Enforce state idling laws for commercial vehicles, including delivery and construction vehicles. • Organize events and workshops to promote GHG-reducing activities. • Implement a Parking Management Program to discourage private vehicle use, including: o Encouraging carpools and vanpools with preferential parking and a reduced parking fee. o Institute a parking cash-out program. o Renegotiate employee contracts, where possible, to eliminate parking subsidies. o Install on-street parking meters with fee structures designed to discourage private vehicle use. o Establish a parking fee for all single-occupant vehicles. • Work with school districts to improve pedestrian and bicycle to schools and restore school bus service. • Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities. • Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency. • Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers. • Synchronize traffic signals to reduce congestion and air quality. • Work with community groups and business associations to organize and publicize walking tours and bicycle events. • Support legislative efforts to increase funding for local street repair.	
TRA-3: Potential to result in a significant change in air traffic patterns, including either an increase in air traffic levels or a change in location that results in substantial safety risks.	No mitigation required.	No mitigation is required.

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TRA-4: Potential to substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections), increased volumes or incompatible uses (e.g., farm equipment).	No mitigation required.	No mitigation is required.
TRA-5: Potential to result in inadequate emergency access.	**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: • Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: o 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. o 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. o Scheduling of truck trips outside of peak morning and evening commute hours. o Limiting of lane closures during peak hours to the extent possible. o Usage of haul routes minimizing truck traffic on local roadways to the extent possible. o Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. o Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones.	The Project substantially conforms to this mitigation measure, because emergency access to the Project site would be provided by the existing street system, and the Project is designed and would be constructed in accordance with LAMC requirements to ensure proper emergency access. Moreover, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lane of opposing traffic. As described above, the Project would include a Project specific mitigation measures which would include protocols to minimize impacts on surrounding roadways during construction.

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	o 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. o Storage of construction materials only in designated areas. o Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. • Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. • Enhance emergency preparedness awareness among public agencies and with the public at large. • Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: o Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities. o Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format. o Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function.	
TRA-6: Potential to result in conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	No mitigation required.	No mitigation required.
Utilities and Service Systems		
USS-1: Potential to exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	No mitigation required.	No mitigation is required.

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USS-2: Potential to require or result in construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	No mitigation required.	No mitigation is required.
USS-3: Require or result in construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	**MM-HYD-5(b)**. **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.	The Project substantially conforms to these mitigation measures, because the largely impervious existing Project Site conditions and the increase in the amount of landscaping and other pervious surfaces, the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Dewatering, treatment, and disposal of groundwater would be conducted in accordance with permitted requirements set forth by the Los Angeles Regional Water Quality Control Board (LARWQCB)'s Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater discharges. In addition, the Project would be designed to comply with the City of Los Angeles's Low Impact Development (LID) design standard. Runoff from the Project site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity. Therefore, the City has determined that the Project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems.

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USS-4: Have sufficient water supplies available to serve the project from existing entitlements and resources or will require new or expanded entitlements.	**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: • Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. • Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. • Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. • Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. • Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.	The Project substantially conforms to this mitigation measure because the net increase of water demand from the 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. The Project would emphasize water conservation, which would be achieved through the use of energy star appliances and low flow plumbing fixtures.
USS-5: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's commitments.	No mitigation required.	No mitigation is required.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Project
USS-6: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	**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: • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: o Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. o Inclusion of a waste management plan that promotes maximum C&D diversion. o 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.). o Reuse of existing structure and shell in renovation projects. o Design for deconstruction without compromising safety. o Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components. o Development of indoor recycling program and space. o 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. o Locally generated waste should be disposed of regionally, considering distance to disposal site. Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required. o 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.	The Project substantially conforms to this mitigation measure because the Project would comply with the City of Los Angeles Green Building Code, which requires the recycling and/or salvaging of 65 percent of non-hazardous construction and demolition waste. Construction and Demolition materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this Ordinance, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain Assembly Bill 939 (AB 939) Compliance Permits and to transport C&D waste to City certified C&D processing facilities. As stated earlier, MM HAZ-1, would include a Site Soil Mitigation Plan that will be used in guidance for any hazardous materials encountered at the Project Site during grading and excavation activities. Hazardous soils will be handled, transported, and disposed of in accordance with SCAQMD Rule 1166 in Class I landfills, which are located out of County.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Project
	o 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. o Develop alternative waste management strategies such as composting, recycling, and conversion technologies. o Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. o Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). o Integrate reuse and recycling into residential industrial, institutional and commercial projects. o Provide recycling opportunities for residents, the public, and tenant businesses. o Provide education and publicity about reducing waste and available recycling services. o Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates. o 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.	
USS-7: Potential to comply with federal, state, and local statutes and regulations related to solid waste.	No mitigation required.	No mitigation is required.

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