LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

FINAL
ENVIRONMENTAL IMPACT REPORT

Cornfield Arroyo Seco Specific Plan (CASP) Update

Environmental Case: ENV-2021-2643-EIR
State Clearinghouse No.: 2021040206

Project Location: The Project Area comprises the entire area within the boundaries of the existing Cornfield Arroyo Seco Specific Plan (CASP), which is generally bordered by Chinatown to the west, Lincoln Heights to the east, and Cypress Park to the north. The Project Area is located entirely within Los Angeles City Council District One and within both the Downtown and the Northeast Los Angeles Community Plan Areas. Interstate 5 (I-5) and State Route-110 (SR-110) bisect the northern portion of the Project Area. Entrances and exits to and from SR-110 are located on the northern perimeter of the Project Area. Entrances and exits to I-5 are located at North Broadway/Pasadena Avenue and at Avenue 26 across from Lacy Street. Other major arterials located in the Project Area include Figueroa Street in the northern portion of the Project Area, San Fernando Road in the central portion of the Project Area, and Spring Street, Broadway Avenue, and Main Street in the southern portion of the Project Area. The Project Area is approximately 600 acres (0.93 square miles).

Council District: 1 (Hernandez)

Project Description: The Proposed Project is an update of the existing CASP. The update includes new land use and zoning regulations, incentives, and boundaries, for the purpose of encouraging affordable, mixed-income, and permanent supportive housing production. The Proposed Project would strengthen the existing CASP's affordable housing requirements, including the recalibration of the CASP's existing incentive zoning system; establish a new Community Benefits Program that incentivizes new publicly-accessible open space and community facilities; include provisions that facilitate the production of new 100% affordable housing and permanent supportive housing projects on public land; increase the zoning capacity for housing in targeted areas; and adopt a modernized zoning system based on the City's new modular Zoning Code. The Proposed Project would supersede the text, maps, and tables of the existing CASP, and will include the adoption of necessary revisions and any other amendments necessary to implement this update, including amendments to General Plan elements (such as the Framework Element), community plans, the Los Angeles Municipal Code (LAMC) Chapter 1 and Chapter 1A, specific plans, and other City ordinances.

PREPARED BY:
The City of Los Angeles
Department of City Planning

PREPARED WITH THE ASSISTANCE OF:
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July 2024

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1.0 INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared by the Los Angeles Department of City Planning (DCP) for the proposed project, which includes the Cornfield Arroyo Seco Specific Plan (CASP) Update (herein referred to as "Proposed Project" or "Project"). This Final EIR complies with the requirements of the California Environmental Quality Act (CEQA) statutes (Cal. Pub. Res. Code, Section 21000 et. seq.) and implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq.) (the "CEQA Guidelines").

1.1 CEQA REQUIREMENTS

Before approving a project that may cause a significant environmental impact, CEQA requires the lead agency to prepare and certify a Final EIR. According to the CEQA Guidelines, Section 15132, the Final EIR shall consist of:

- The Draft EIR or a revision of the Draft EIR;
- Comments and recommendations received on the Draft EIR, either verbatim or in summary;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- The responses of the lead agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the lead agency.

As shown, under the CEQA Guidelines, the Final EIR includes the Draft EIR as well the other items listed. For purposes of clarity, the term "Final EIR" in this document refers to everything contained in this document (as described in Section 1.3, below) and not the Draft EIR. The term "EIR" in this document refers to the Final EIR and the Draft EIR.

1.2 PUBLIC REVIEW PROCESS

Pursuant to CEQA Guidelines Section 15082, the City filed a Notice of Preparation (NOP) with the State Clearinghouse in the Office of Planning and Research (State Clearinghouse No. 2021040206) as an indication that an EIR would be prepared. The Department of City Planning published the NOP for this Draft EIR for a 30-day public review period on April 8, 2021. The NOP was distributed to trustee agencies, responsible agencies, and other interested parties to request information and concerns relative to the potential environmental impacts of the Proposed Project.

Information, data and observations addressing comments from these letters were included throughout the Draft EIR where relevant. The NOP and NOP comment letters received are included in Appendix A of this EIR. A public Scoping Meeting was held on April 22, 2021, to provide early consultation for the public to express their concerns about the Proposed Project and to acquire information and make recommendations on issues to be addressed in the Draft EIR, including the scope of impacts, alternatives, and potential mitigation. The Draft EIR was circulated for a 60-day public review from July 10, 2023 to September 18, 2023.

1.3 CONTENT AND ORGANIZATION OF THE FINAL EIR

The Final EIR (this document) summarizes the project information presented in the Draft EIR and contains responses to comments on environmental issues received from agencies, organizations, and individuals who reviewed the Draft EIR. Chapters 1 through 6 of the Draft EIR, in addition to the following chapters, together constitute the Final EIR as required by the CEQA Guidelines.

- **Chapter 1** – **Introduction.** This chapter summarizes the contents of the Final EIR and the environmental review process.
- **Chapter 2** – **Corrections and Additions to the Draft EIR.** This chapter provides a list of changes that were made to the Draft EIR. These revisions are shown in strikeout and underline text in this chapter.
- **Chapter 3** – **Responses to Comments.** During the public review period for the Draft EIR, the City received 10 comment letters. This chapter contains summaries of these comment letters and the City's responses to those comments that raise significant environmental points. A list of individuals, organizations, and public agencies commenting on the Draft EIR is provided within this section.
- **Chapter 4** – **Mitigation Monitoring Program (MMP).** This chapter includes the Mitigation Monitoring Program (MMP) prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Section 15091(d) and 15097 of the *State CEQA Guidelines*.

1.4 REVIEW AND CERTIFICATION OF THE FINAL EIR

Consistent with CEQA (Public Resource Code Section 21092.5), responses to agency comments are being forwarded to each commenting agency prior to certification of the Final EIR. In addition, responses are also being distributed to all commenters via email. The Final EIR can be downloaded at: https://planning.lacity.gov/development-services/eir

1.5 SUMMARY OF THE PROPOSED PROJECT

The Proposed Project is an update of the existing Cornfield Arroyo Seco Specific Plan (CASP). The update includes new land use and zoning regulations, incentives, and boundaries, for the purpose of encouraging affordable, mixed-income, and permanent supportive housing production. The Proposed Project would supersede the text, maps, and tables of the existing CASP, and will include the adoption of necessary revisions and any other amendments necessary to implement this update, including amendments to General Plan elements (such as the Framework Element), community plans, the Los Angeles Municipal Code (LAMC) Chapter 1 and Chapter 1A, specific plans, and other City ordinances.

The Proposed Project would strengthen the existing CASP's affordable housing requirements, including the recalibration of the CASP's existing incentive zoning system; establish a new Community Benefits Program that incentivizes new publicly-accessible open space and community facilities; include provisions that facilitate the production of new 100% affordable housing and permanent supportive housing projects on public land; increase the zoning capacity for housing in targeted areas; and adopt a modernized zoning system based on the City's new modular Zoning Code. The Proposed Project would also update the building form, urban design, open space, parking, conservation, performance, and sign standards of the existing CASP, including adopting standards in the new Zoning Code in lieu of those in the existing CASP, as necessary to support housing production and implement technical revisions that ensure consistency, clarity, and ease of implementation and reflect current and

future demographic, regulatory, environmental, and economic conditions. The Project Area boundaries would be revised to exclude parcels that currently do not contain zoning such as RD zones within the Project Area, or to exclude peripheral open space areas adjacent to Elysian Park in the Silver Lake-Echo Park-Elysian Valley Community Plan Area. The Proposed Project would retain the existing ministerial review process for subsequent qualifying development projects.

The purpose of the Proposed Project is to encourage the production of affordable, mixed-income, and permanent supportive housing in the Project Area, in a manner consistent with the underlying vision and purpose of the existing CASP.

Objectives of the Proposed Project are as follows:

- Increase the production of affordable, mixed-income, and permanent supportive housing within the Project Area.
- Protect residents, especially low-income households, from indirect and direct displacement, and ensure stability of existing vulnerable communities.
- Design and regulate housing to promote health and well-being, increase access to amenities such as parks and public transit, contribute to a sense of place, foster community and belonging, and plan for a sustainable future.
- Build, operate, and maintain welcoming and accessible housing for Angelenos with unique needs, including those with disabilities, large families, older adults, and other people facing housing barriers and economic insecurity.
- Refine Plan standards, processes, and procedures to be more intuitive and transparent, with the goal of enhancing development certainty for both market-rate and affordable housing developers; and
- While reducing overall employment capacity, preserve employment areas that show a concentration of jobs, while supporting small and/or legacy businesses, local employment, and new productive uses and employment spaces, such as light industrial and general commercial uses.

1.6 SUMMARY OF THE PROPOSED PROJECT IMPACTS

Section 15382 of the *State CEQA Guidelines* defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project, including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance." In order to approve a project with significant and unavoidable impacts, the lead agency must adopt a written Statement of Overriding Considerations (in accordance with Section 15093 of the State CEQA Guidelines) demonstrating that the decisionmaker has found that on balance the benefits of approving the Proposed Project outweigh the negative environmental consequences.

Project impacts found to be significant and unavoidable are the impacts to Air Quality due to exceedance of criteria air pollutant emission standards from construction and operation related emissions including nitrogen oxides (NOx), particulate matter (PM), and volatile organic compounds (VOCs); impacts to Cultural Resources due to the loss of historical resources; Noise impacts for temporary construction-related noise and construction-related ground vibration impacts; and impacts to Transportation and Traffic, specifically traffic safety impacts related to highway off-ramp queuing. Impacts found to be potentially significant but able to be reduced to a less than significant level with the imposition of proposed mitigation include Air Quality impacts to sensitive receptors from construction-related activities; Biological Resources impacts to birds or other special status species from construction activities; Cultural Resources impacts from ground-disturbing activities to archaeological resources; Geology and Soils impacts from ground-disturbing activities to

paleontological resources; Hazards and Hazardous material impacts resulting from contaminated soils; Tribal Resources impacts from unanticipated discovery of tribal cultural resources; and Utilities and Services impacts on water facilities and supply.

1.7 MODIFICATIONS AND TECHNICAL REFINEMENTS TO THE PROPOSED PROJECT

As a result of comments received on the Draft Environmental Impact Report (EIR) and through the Proposed Project's public hearing process during and following the September 2023 public hearing, and with recommended changes from the City Planning Commission (CPC), changes have been made to the text, tables, and maps of the Proposed CASP. As described below, the changes to the Proposed Project are found to make only minor changes to the overall project described in Chapter 3, Project Description have been analyzed in the EIR and this section discusses how the minor modifications to the Proposed Project do not result in significant new information under *State CEQA Guidelines* Section 15088.5 as a result of causing a new significant impact or substantial increase in the severity of an environmental impact. Although these changes do not constitute significant new information per CEQA, they remain subject to final adoption by the City Council and Mayor.

Proposed CASP (Specific Plan Document)

Based on comments received during and after the September 2023 public hearing and recommendations from the City Planning Commission during the December 14, 2023 public hearing, the following modifications and refinements have been made to the Proposed CASP specific plan document:

- **Chapter 1 (Introduction):**
  - Added clarification that the CASP Special District does not apply on lots located within the Freeway Special District ("FWY").
  - Revised Map 1-2 to denote the parcels subject to the FWY Special District and clarify that the Hybrid Industrial, Public Facilities, and Open Space General Plan Land Use Designations correspond with the CASP Special District.
- **Chapter 2 (Form):**
  - Revised Form Districts Map 2-1 to change where Form Districts CASP-FOR, CASP-FO1, CASP-FO2, and CASP FO-3 are applied for properties west of the Los Angeles River.
  - Revised Form Districts Table 2-1 to change the Bonus Floor Area Ratio (FAR) in Form Districts CASP-FOR and CASP-FO1 to 4.5 to be consistent with the Local Affordable Housing Incentive Program text in Chapter 7 (Community Benefits Program).
  - Revised Form Districts Table 2-1 to change the maximum story height to 7 stories in Form District CASP-FOR, compared to a maximum story height of 5 stories.
- **Chapter 3 (Frontage):**
  - Edited Frontage Districts Table 3-1 to correct a typographical error, changing the minimum planting area for River frontages from 75 feet to 75 percent.
- **Chapter 5 (Use):**
  - Revised Use Districts Map 5-1 to apply the Urban Village Use District to a three-acre block bound by Darwin Avenue, Avenue 20, North Main Street, and Avenue 19.

  - Revised 5.D.2 and 5.E.2 to change the minimum non-residential floor area for a Dwelling or Live/Work use to 15 percent of floor area, with a minimum obligation of 0.5 FAR and a maximum obligation of 1.0 FAR.
  - Revised 5.C.2, 5.D.2, and 5.E.2 to introduce additional limits on warehousing uses, outdoor storage, textile manufacturing, and motor vehicle uses; and to add a "CU2" Conditional Use Permit requirement for the sale of alcoholic beverages for on-site consumption or retail.

- **Chapter 7 (Community Benefits Program):**
  - Revised 7.B.1 to change the Bonus Floor Area from a 100 percent FAR increase to 4.5 FAR.
  - Added Section 7.B.2.c to add advertising requirements and criteria for new deed-restricted affordable units.

- **Chapter 8 (Streets):**
  - Revised Subarea 1 Street Map to replace Proposed Street Extension with Proposed Paseo for the segment of proposed Naud Street between Sotello Street and Mesnager Street.
  - Revised 8.B.4 to include specifications for Proposed Paseo and additional specifications for Proposed Street Extension, including minimum widths.

1.8 ENVIRONMENTAL IMPACTS OF MODIFICATIONS AND TECHNICAL REFINEMENTS TO THE PROPOSED PROJECT

The modifications and technical refinements to the Proposed Project include items such as:

- Edits to text, tables, and maps to improve clarity and to address typographical errors and internal consistency within the document.
- Modifications to the application of Form Districts, which include FAR, height, bulk, and massing standards, on specific parcels.
- Modifications to the application of Use Districts on specific parcels, along with changes to the allowable uses of each Use District to improve land use compatibility and Citywide consistency.
- Modifications to the Community Benefits Program to allow for greater Bonus Floor Area as part of the Local Affordable Housing Incentive Program.
- Refinements to street improvement requirements with additional design specifications, including new distinctions between a Proposed Paseo and a Proposed Street Extension.

The modifications would not result in notable physical changes with the potential to result in significant environmental impacts. Of the zoning and land use changes outlined above, the total acreage where the Form Districts have changed is approximately 3.5% of the total land area of the Project Area, while the total acreage where Use Districts have changed is approximately 0.5% of the total land area of the Project Area. Importantly, none of the above zoning changes resulted in increased Base FAR regulations that would result in substantial changes to building size or development. Further, it should be noted that while these changes occur at the parcel level, the overall reasonably expected development of the Project Area has not changed, either increased or decreased. As projects are developed and buildout of the Proposed Project occurs, it is unlikely that all parcels with identified land use changes will be redeveloped or that parcels will be redeveloped to the full potential that the proposed zoning allows. The proposed changes outlined above are intended to help increase the design flexibility and feasibility of individual projects but do not change the reasonably expected development at an

aggregate level, which is shaped by numerous factors such as physical site constraints, other zoning and building code regulations, public review processes, historical preservation goals and regulations, historical development patterns, land values, and market factors. The EIR for the Proposed Project identifies and discloses impacts for the entirety of the Project Area and does not identify any one parcel where impacts could occur, but rather identifies the types of impacts that could occur throughout the Project Area as build out of the Proposed Project occurs. Therefore, these modifications to the Proposed Project are found to not result in new significant impacts or a substantial increase in the severity of an impact identified in the DEIR and are found to not constitute significant new information for purposes of *State CEQA Guidelines* Section 15088.5.

2.0 CORRECTIONS AND ADDITIONS

As required by California Environmental Quality Act (CEQA) Guidelines Section 15088, this chapter provides corrections or clarifications of certain statements in the Draft Environmental Impact Report (DEIR). The correction(s) and/or addition(s) do not constitute significant new information, as defined by CEQA Guidelines Section 15088.5, because none would result in new significant impacts or a substantial increase in the severity of any impact already identified in the DEIR.

New information is not significant unless the DEIR changes in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project. Specifically, Section 15088.5(a) defines significant new information which requires recirculation to be any of the following:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
4. The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043).

Corrections or information has been added to the DEIR pursuant to CEQA Guidelines Section 15132, as part of the preparation of the Final EIR (FEIR). Additions to the text of the DEIR are shown by underline and deletions from the text of the DEIR are shown by ~~strikethrough~~ unless otherwise described. Where mitigation measures are replaced in their entirety with a new measure that mirrors a City Environmental Protection Measure (EPM), only the underlined replacement measure is provided herein; the measure from the DEIR that has been replaced is not shown in ~~strikethrough~~ text. Where mitigation measures are replaced or revised, the replacement or revised measures are listed under the relevant impact section; however, the revisions also apply to mitigation measure listed in the *Executive Summary*.

As noted above, the following corrections and additions included herein involve minor modifications that clarify or amplify information contained in the DEIR and none would result in new significant impacts from those identified in the DEIR impact analysis or conclusions.

SECTION 4.2, AIR QUALITY

Page 4.2-28 – Revise Mitigation Measure 4.2-2 to read as follows:

4.2-2 Construction Emissions Reduction

~~The City shall require all projects that involve construction-related activity to comply with the following and require the developers to notify any contractors, and include in any agreements with contractors and subcontractors, the following, or equivalent, best management practices in construction specifications:~~

SECTION 4.3, BIOLOGICAL RESOURCES

Page 4.3-26 – Insert the following text after the fourth paragraph as follows:

> Non-listed bat species, protected under CFGC, may occur within the Project Area in trees with exfoliating bark, tree hollows, broad leafed trees, palm fronds, bridges, hollow beams, attics, and eaves of buildings. Bats typically have a maternity season (generally from April 1 through August 31) and maternity roosts will be situated in areas to raise young. Depending on the species, some bats may not migrate and will use the same roost year-round. Additionally, bats may go into torpor (a temporary hibernation) during colder months (generally November to February) where bats may not be detectable while they are in deep sleep, making any potential relocations or evictions more challenging during this time frame. Many non-listed bat species are adapted to human disturbance and may roost throughout the Project Area. As such, tree trimming or removal as well as removal of structures with suitable crevices in the Project Area would have the potential to disturb a roosting bat, which could constitute a violation of the CFGC. In addition to direct impacts to roosting bats, temporary, indirect impacts including excessive noise or dust could affect bats. Therefore, impacts to active non-listed bats would be *potentially significant* before mitigation.

Page 4.3-27 – Revise Mitigation Measure 4.3-1 to read as follows:

> For individual projects that will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present, a qualified biologist shall be retained by the applicant to conduct an initial site assessment. The assessment will include a review of biological resources with potential on the Project site and surrounding area. It will include a search of the California Natural Diversity Database (CNDDB) ~~and iNaturalist maps~~ to determine where sightings have occurred or habitats for nesting birds, or bat species have previously been identified. A site assessment survey may be required for sites that are in proximity to areas where habitats for nesting birds or bat species occur. Species-specific surveys may be required for sites that contain suitable habitats for nesting birds or non-listed bat species. Species-specific surveys for sites that contain suitable habitat for protected species and non-listed bat species, and preparation of a report that includes an impact analysis with emphasis on identifying endangered, threatened, sensitive, regionally, locally unique species, and sensitive habitat, and potential direct, indirect, and cumulative biological impacts with specific mitigation measures necessary to avoid those impacts. If any observations of special status species and non-listed bat species are made during a biological resource assessment for individual projects, the biologist shall submit all observations of special status species and non-listed bat species to CNDDB and all observations of special status plant populations or sensitive communities to CDFW's Vegetation Classification and Mapping Program within 90 calendar days of the observation.

SECTION 4.4, CULTURAL RESOURCES

Page 4.4-13 - Insert the following text after the last paragraph as follows:

> *William Mead Homes Site*
>
> In 2024, Rincon Consultants, Inc. prepared a cultural resources impacts assessment for the William Mead Homes site located within the Project Area (Appendix C – William Mead Homes Project Cultural Resources Impact Report). Totaling approximately 20 acres, the site is currently developed with William Mead Homes, a public housing complex that was

constructed in 1941-1942 and has been previously determined eligible for listing in the National Register of Historic Places (NRHP) with the California State Historic Preservation Officers (SHPO) concurrence. The assessment includes a California Historical Resources Information System (CHRIS) records search; a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search; background research including in-depth review of geotechnical, soil remediation, archival, academic, and ethnographic information; a review of past historical resources surveys, inventories, and previous historical resources evaluations of William Mead Homes; an archaeological and built environment pedestrian survey of the William Mead Homes site; an analysis of the sensitivity of the William Mead Homes site to contain archaeological resources; and an impacts assessment and recommended mitigation measures for archaeological and built environment resources.

The background research and field survey completed as part of the study confirmed the presence of one previously determined NRHP-eligible property within the William Mead Homes site. William Mead Homes has been determined eligible for listing in the NRHP under Criterion A for its association with the development of public and defense worker housing in Los Angeles during World War II, and under NRHP Criterion C as an excellent example of a Los Angeles public housing development that embodies the planning and design principles of the Garden City and Modern movements. SHPO concurred with the eligibility determination in 2002. Due to its formal determination of NRHP eligibility, the property is automatically listed in the California Register of Historical Resources (CRHR) and is considered a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines.

Page 4.4-33 – Revise the last paragraph to read as follows:

All discretionary projects that have the potential to impact historical resources must be individually reviewed by the Office of Historic Resources. While the Office of Historic Resources reports that it is extremely uncommon in the City to lose designated historical resources when a property owner has complied with the City's regulations, the Cultural Heritage Ordinance and the Building Code, it cannot prevent a property from being demolished or redeveloped or prevent structures from being altered. Rather these ordinances provide for processes, including environmental review, but they do not prohibit demolition. It is possible that demolition and/or significant alteration to some of the historical resources within the Project Area would occur during the life of the Proposed Project. <u>For example, the Housing Authority of the City of Los Angeles (HACLA) is exploring the potential future redevelopment of housing on the William Mead Homes site, which is composed of one built environment historical resource, the William Mead Homes property. The resource was determined eligible for the NRHP, with SHPO concurrence, and is listed in the CRHR; the property therefore qualifies as a historical resource as defined by Section 15064.5(a) of the CEQA Guidelines (see Appendix C – William Mead Homes Project Cultural Resources Impact Report). Redevelopment of the William Mead Homes site, which could occur due to the Proposed Project, would result in the demolition of buildings and structures that contribute to the resource's eligibility for listing in the NRHP and CRHR. A project that may cause a substantial adverse change in the significance of a historic resource is one where the change would result in the significance of the resource being materially impaired. As such, the future redevelopment of the site would cause the material impairment of William Mead Homes, meaning it would alter in an adverse manner, those physical characteristics that convey its historical significance and that justify its inclusion in the NRHP and CRHR.</u> Therefore, the Proposed Project's impacts related to historical resources would be potentially ***significant and unavoidable***.

Page 4.4-34 – Revise the first paragraph to read as follows:

Mitigation Measures

If the contributing building and structures on the William Mead Homes site are demolished, HACLA will be required to implement the following Mitigation Measures.

4.4-1(a) Interpretive Display

HACLA, as lead agency and Applicant, shall retain a qualified historian or architectural historian meeting the Secretary of the Interior's Qualification Standards (NPS 1983) in coordination with the City of Los Angeles Office of Historic Resources to prepare content for an interpretive display in a portion of the project site which will be open to the public. The interpretive display shall be completed and installed prior to the issuance of occupancy permits for the new development. It shall include a brief history of William Mead Homes and present its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the project which led to the demolition of the historical resource. The display shall be professionally written, illustrated, and designed, and shall include the website address associated with the informational website created by implementation of Mitigation Measure 4.4-1(b). The Interpretive Display may be rotated amongst publicly accessible spaces located throughout the project site with approval by HACLA. This mitigation measure shall only apply to any future redevelopment of the William Mead Homes site.

4.4-1(b) Informational Website

HACLA shall add to their existing website a section dedicated to the history of William Mead Homes and public housing in Los Angeles within six months of the issuance of a grading permit for the project. The website shall be maintained by HACLA and shall provide content on the history of William Mead Homes, the significance of public housing in the city, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of the site within the context of public housing in the city. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's Professional Qualifications Standards for history or architectural history and shall be periodically updated, as needed, if new scholarly information related to the history or significance of William Mead Homes and public housing become available following the initial publishing of the website. This mitigation measure shall only apply to any future redevelopment of the William Mead Homes site.

Significance After Mitigation

~~No feasible mitigation measures have been identified.~~ As discussed above, historical resources that are designated under HCM may be demolished if an applicant goes through the discretionary review process and prepares necessary environmental review. Resources included in 2011 Project Area Survey are not prohibited from demolition or alteration, provided they go through the appropriate process including environmental review. As a policy matter, the City finds that requiring additional review of projects otherwise undergoing discretionary review is undesirable based on the requirements it would place on City resources and the delay it would result in for projects. Additionally, as a policy matter, the City finds that it is undesirable to put additional regulations or processes on ministerial projects involving historical resources that are designated under the HCM or identified in the 2011 Project Area Survey. Based on the above, there is no feasible mitigation to prevent the demolition or

substantial alteration of historical resources. Mitigation Measures 4.4-1(a) and 4.4-1(b) above would serve to reduce historical resources impacts to the greatest extent feasible relative to the potential future redevelopment of the William Mead Homes site. However, even after mitigation, ~~Therefore,~~ impacts to historical resources, including the William Mead Homes site, from the Proposed Project ~~Plan~~ will remain ~~be~~ ***significant and unavoidable***.

Page 4.4-35 – Revise the first paragraph of Mitigation Measure 4.4-2(a) to read as follows:

4.4-2(a) Archaeological Resources Evaluation and Avoidance/Recovery

CR1-1: Inadvertent Discovery

a. Applicability Threshold

Any Project that requires a permit for grading or excavation.

b. Standard

~~For any project that requires a permit for grading or excavation, if~~ If a possible archaeological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Archaeologist has been retained to evaluate the find in accordance with National Register of Historic Places and California Register of Historical Resources criteria. The Qualified Archaeologist may adjust this avoidance area, ensuring appropriate temporary protection measures of the find are taken while also considering ongoing construction needs in the surrounding area. Temporary staking and delineation of the avoidance area shall be installed around the find in order to avoid any disturbance from construction equipment. Ground Disturbance Activities may continue unimpeded on other portions of the site outside the specified radius.

Page 4.4-35 – Revise the first five paragraphs of Mitigation Measure 4.4-2(b) to read as follows:

4.4-2(b) Noticing

Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner.

Archaeological, Paleontological, and Tribal Cultural Resources Notice: Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to:

~~Prior to issuance of a permit for grading or excavation all project applicants will receive notice and acknowledge receipt of the following notice:~~

~~Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to:~~

- California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."

- Public Resources Code Section 5097.5(a) states: "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." A violation of Section 5097.5 is a misdemeanor subject to a fine up to $10,000 and/or a year in jail, and potential restitution.
- ~~California Code of Regulations, Title 14, Section 4307 states: "No person shall remove, injure, deface or destroy any object of paleontological, archaeological, or historical interest or value." Section 1427 "recognizes that California's archaeological resources are endangered by urban development and population growth and by natural forces…Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archaeological or historical interest or value, whether situated on private lands or within any public park of place, is guilty of a misdemeanor. It is a misdemeanor to alter any archaeological evidence found in any cave, or to remove any materials from a cave."~~

Page 4.4-37 – Revise the first two paragraphs of Mitigation Measure 4.4-2(c) to read as follows:

4.4-2(c) Zanja Madre

CR2-1: Zanja Madre HAER Documentation

a. Applicability Threshold

Any project that requires a permit for grading or excavation and that is located within one mile of the currently known and mapped segments of the Zanja system.

b. Standard

Projects within 500 feet of the currently mapped known segments of the Zanja system (see Appendix F) have increased likelihood of encountering segments of the Zanja system during construction. The Zanja system includes the Zanja Madre and its outbranching secondary Zanja segments. If possible, segments of the Zanja system are uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a qualified archaeologist has been retained to inspect and evaluate the find. The qualified archaeologist may adjust this avoidance area, ensuring appropriate temporary protection measures of the find are taken while also considering ongoing construction needs in the surrounding area. Temporary staking and delineation of the avoidance area shall be installed around the find in order to avoid any disturbance from construction equipment. Ground Disturbance Activities may continue unimpeded on other portions of the site outside the specified radius.

SECTION 4.6, GEOLOGY AND SOILS

Page 4.6-3 – Revise the paragraph under *Project Area Liquefaction* as follows:

The majority of the Project Area is located in a liquification zone and would be subject to earthquake induced liquification. In particular, according to the California Department of Conservation (DOC), California Geological Survey (CGS) unit, the Project Area is situated

within the Los Angeles Liquefaction Zone[1]. According to CGS, their maps are used by cities and counties to regulate development and by property owners selling property within areas where seismic hazards zones have been identified. The maps helps digitally illustrate areas where liquefaction and landslides may occur during a strong earthquake.

Page 4.6-5 – Revise the paragraph under *Project Area Landslides* as follows:

According to the Los Angeles Seismic Hazard Map, there are no landslide zones in the Project Area. However, sections of slope on Elysian Park directly bordering the northern portion of the ~~Plan~~ Project Area~~s~~ ~~are~~ is relatively steep and may be subjected to instability and are designated as landslide zones by CGS. According to CGS and the DOC, minimal portions of the Project Area contain mapped Landslide Zones, which are used by cities and counties to regulate development.[2] In this case, the Project Area contains portions of the Los Angeles Landslide Zone, especially those areas near the Interstate-10 freeway.

Page 4.6-27 – Revise Mitigation Measure 4.6-6(b) in its entirety to read as follows:

4.6-6(b) Treatment of Paleontological Resources

CR3-1: Inadvertent Discovery

a. Applicability Threshold

Any Project that requires a permit for grading or excavation.

b. Standard

If a probable paleontological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Paleontologist has been retained to evaluate the find in accordance with the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. Any paleontological materials that are uncovered shall not be moved or collected by anyone other than a Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor. If cleared by the Qualified Paleontologist, Ground Disturbance Activities may continue unimpeded on other portions of the site. The found deposit(s) shall be treated in accordance with the Society of Vertebrate Paleontology's Standard Procedures. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by Qualified Paleontologist. A report that describes the resource and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Paleontologist according to current professional standards and maintained pursuant to the proof of compliance requirements in Subsection I.D.6. If appropriate, the report should also contain the Qualified Paleontologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply.

Page 4.6-27 – Revise Mitigation Measure 4.6-6(c) in its entirety to read as follows:

[1] *https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps*

[2] *https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-landslide-zones-doc-hosted/about*

Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner.

Archaeological, Paleontological, and Tribal Cultural Resources Notice: Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to:

- California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."
- Public Resources Code Section 5097.5(a) provides: "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." A violation of Section 5097.5 is a misdemeanor subject to a fine up to $10,000 and/or a year in jail, and potential restitution.

The following best practices are recognized by paleontologists and environmental consultants to ensure paleontological resources are not damaged during construction or Ground Disturbance Activities:

- A paleontological resources records search shall be requested from and conducted by the Natural History Museum of Los Angeles County to determine whether any paleontological resources have been previously identified on or near the Project site. The results of this records search shall be used as an indicator of the paleontological sensitivity of the Project site.
- A Qualified Paleontologist shall be retained and use all reasonable methods, consistent with professional standards and best practices, to determine the potential for paleontological resources to be present on the Project site.
- If the Qualified Paleontologist determines there is a high potential that paleontological resources may be located on the Project site and it is possible that such resources will be impacted by the Project, the Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor shall observe all Ground Disturbance Activities within those areas identified as having an undetermined or high potential in order to identify any resources and avoid potential impacts to such resources. In the event of a possible paleontological discovery, the Qualified Paleontologist or Paleontological Monitor shall have the authority to temporarily halt earthwork activities within an appropriate radius of the find, as determined by the Qualified Paleontologist, necessary to protect the resource or other potential resources on or near the Project site. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment.
- Prior to the start of construction, the Qualified Paleontologist or his/her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff.

- If paleontological resources are uncovered (in either a previously disturbed or undisturbed area), all work should cease in the area of the find until a Qualified Paleontologist has evaluated the find in accordance with federal, state, and local guidelines, including the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP, 2010).
- If fossils are discovered, a Qualified Paleontologist shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist has the authority to temporarily direct, divert or halt construction activity to ensure the fossil(s) can be removed in a safe and timely manner. Handling and disposition of fossils is done at the direction and guidance of a Qualified Paleontologist.
- Personnel of the Project should not collect or move any paleontological materials or associated materials.
- If cleared by the Qualified Paleontologist, construction activity may continue unimpeded on other portions of the Project site.
- Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Qualified Paleontologist, and the Qualified Paleontologist clears the site for construction activity.

SECTION 4.8, HAZARDS AND HAZARDOUS MATERIALS

Page 4.8-44 – Revise Mitigation Measure 4.8-4(a) in its entirety to read as follows:

4.8-4(a) Database Review, Investigation, and Remediation

HM1-2: Environmental Site Assessment

a. Applicability Threshold

Any Project that requires a grading, excavation, or building permit from LADBS and which is:

- Located on or within 500 feet of a Hazardous Materials site listed in any of the following databases:
  - State Water Resources Control Board GeoTracker (refer to https://geotracker.waterboards.ca.gov);
  - DTSC EnviroStor (refer to https://www.envirostor.dtsc.ca.gov/public);
  - DTSC Hazardous Waste Tracking System (refer to https://hwts.dtsc.ca.gov);
  - LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at https://www.lafd.org/fire-prevention/cupa/public-records);
  - Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California

Accidental Release Prevention inventory lists at https://fire.lacounty.gov/public-records-requests);

- SCAQMD Facility Information Detail (refer to https://xappprod.aqmd.gov/find); or

- Located on or within 500 feet of a Hazardous Materials site designated as a Resource Conservation and Recovery Act (RCRA) Small Quantity Generator or Large Quantity Generator (refer to the USEPA Envirofacts database at https://enviro.epa.gov/index.html); or
- Located in an Oil Drilling District (O) or located on or within 50 feet of a property identified as having an oil well or an oil field (active or inactive) by the California Geologic Energy Management Division (refer to https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx); or
- Located on land currently or previously designated with an industrial use class or industrial zoning, in whole or in part; or
- Located on land currently or previously used for a gas station or dry cleaning facility.

Or:

- The Applicant or Owner are aware or have reason to be aware that the Project site was previously used for an industrial use, gas station or dry cleaner.

And:

- The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or site conditions.

b. Standard

A Phase I Environmental Site Assessment shall be prepared by a Qualified Environmental Professional in accordance with State standards/guidelines and current professional standards, including the American Society for Testing and Materials' (ASTM) Standard Practice for Environmental Site Assessments, to evaluate whether the site, or the surrounding area, is contaminated with hazardous substances from any past or current land uses, including contamination related to the storage, transport, generation, or disposal of toxic or Hazardous Waste or materials.

If the Phase I identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I, a Phase II Environmental Site Assessment shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II Environmental Site Assessment(s) shall be maintained pursuant to the proof of compliance requirements in Section I.D.6 and made available for review and inclusion in the case file by the appropriate regulatory agency, such as the State Water Resources Control Board, the State Department of Toxic Substances Control, or the LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II Environmental Site Assessment or by the appropriate regulatory agency shall be implemented and, if required, a No Further Action letter shall be issued by the appropriate regulatory agency prior to issuance of any permit from LADBS, unless the regulating agency determines that remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval by a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance with and completion of the

remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained pursuant to the proof of compliance requirements in Section I.D.6.

SECTION 4.11, NOISE

Page 4.11-24 – Revise Mitigation Measure 4.11-1 in its entirety to read as follows:

4.11-1 Project-Specific Noise Study

NV1-6: Noise Study

a. Applicability Threshold

Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from LADBS; are located within 500 feet of Noise-Sensitive Uses; and have one or more of the following characteristics:

- Two or more subterranean levels;
- 20,000 cubic yards or more of excavated material
- Simultaneous use of five or more pieces of construction equipment; or
- Construction duration (excluding architectural coatings) of 18 months or more.

Or any Project whose construction activities involve impact pile driving or the use of 300 horsepower equipment.

b. Standard

A Noise Study prepared by a Qualified Noise Expert shall be required and prepared prior to obtaining any permit by LADBS. The Noise Study shall characterize expected sources of earthwork and construction noise that may affect identified Noise-Sensitive Uses, quantify expected noise levels at these Noise-Sensitive Uses, and recommend measures to reduce noise exposure to the extent noise reduction measures are available and feasible, and to demonstrate compliance with any noise requirements in the LAMC. Specifically, the Noise Study shall identify noise reduction devices or techniques to reduce noise levels in accordance with accepted industry practices and in compliance with LAMC standards. Noise reduction devices or techniques shall include but not be limited to mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. The Noise Study shall identify anticipated noise reductions at Noise-Sensitive Uses associated with the noise reduction measures. Applicants and Owners shall be required to implement and comply with all measures identified and recommended in the Noise Study. The Noise Study and copies of any contractor agreements shall be maintained pursuant to the proof of compliance requirements in Section I.D.6.

Page 4.11-27 – Revise Mitigation Measure 4.11-2(a) in its entirety to read as follows:

4.11-2(a) Vibration Control Plan

NV2-1: Baseline Survey and Vibration Control Plan

a. Applicability Threshold

Any Project, with the exception of Projects limited to the construction of 2,000 square feet or less of floor area dedicated to residential uses, whose earthwork or construction activities: (1) involve the use of construction equipment, including Heavy Construction Equipment, that produces 0.12 PPV or more of vibration at a distance of 25 feet (see reference vibration levels in Appendix F); (2) require a permit from LADBS; and (3) which occur:

- Within 25 feet of any building extremely susceptible to vibration damage, including unreinforced masonry buildings, tilt-up concrete wall buildings, wood-frame multi-story buildings with soft, weak or open front walls, and non-ductile concrete buildings, or a building that is designated or determined to be a historic resource pursuant to local or state law or that is determined to be potentially eligible for historic designation in a Historic Resources Survey; or
- Within 15 feet of non-engineered timber and masonry buildings.

Or any Project whose construction activities involve the use of pile drivers within 135 feet of any building extremely susceptible to vibration damage, including existing unreinforced masonry buildings, existing tilt-up concrete wall buildings, existing wood-frame multi-story buildings with soft, weak or open front walls, and existing non-ductile concrete buildings, or a building that is designated or determined to be a historic resource pursuant to local or state law or that is determined to be potentially eligible for historic designation in a Historic Resources Survey.

b. Standard

Prior to demolition, grading/excavation, or construction, a Qualified Structural Engineer shall prepare a survey establishing baseline structural conditions of potentially affected structures and a Vibration Control Plan, which shall include methods to minimize vibration, including, but not limited to:

- A visual inspection of the potentially affected structures to document (by video and/or photography) the apparent physical condition of the building (e.g., cracks, broken panes, etc.).
- A shoring design to protect the identified structures from potential damage;
- Use of drilled piles or a sonic vibratory pile driver rather than impact pile driving, when the use of vibrating equipment is unavoidable;
- Use of rubber-tired equipment rather than metal-tracked equipment; and
- Avoiding the use of vibrating equipment when allowed by best engineering practice.

SECTION 4.16, TRIBAL CULTURAL RESOURCES

Page 4.16-6 – Revise the first paragraph of Mitigation Measure 4.16-1(a) to read as follows:

4.16-1(a) Unanticipated Discovery of Tribal Cultural Resources

CR4: Inadvertent Discovery

a. Applicability Threshold

Any Project that requires a permit for grading or excavation.

b. Standard

If a possible tribal cultural resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Tribal Monitor or Archaeological Monitor has been retained to evaluate the find.

~~If a possible tribal cultural resource is uncovered during earthwork or construction related to any project that requires a permit for grading or excavation, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Tribal Monitor or Archaeological Monitor has been retained to evaluate the find.~~

Page 4.16-7 – Revise the first five paragraphs of Mitigation Measure 4.16-1(c) to read as follows:

4.16-1(c) Notices for Non-Discretionary Projects

Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner.

Archaeological, Paleontological, and Tribal Cultural Resources Notice: Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to:

~~All projects that are seeking excavation or grading permits, prior to issuance of a permit for grading or excavation, the Department of Building and Safety shall issue the following notice and obtain a signed acknowledgement that the notice was received and read by the applicant and owner.~~

~~Several federal and State laws regulate the treatment of tribal resources and make it a criminal violation to destroy those resources. These include, but are not limited to:~~

- California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor."
- Public Resources Code Section 5097.5(a) states: "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." A violation of Section 5097.5 is a misdemeanor subject to a fine up to $10,000 and/or a year in jail, and potential restitution.
- ~~California Code of Regulations, Title 14, Section 4307 states: "No person shall remove, injure, deface or destroy any object of paleontological, archaeological, or historical interest or value." Section 1427 "recognizes that California's archaeological resources are endangered by urban development and population growth and by natural~~

~~forces…Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archaeological or historical interest or value, whether situated on private lands or within any public park of place, is guilty of a misdemeanor. It is a misdemeanor to alter any archaeological evidence found in any cave, or to remove any materials from a cave."~~

SECTION 5.5, COMPARATIVE IMPACT ANALYSIS

Page 5-7 – Revise a sentence in the last paragraph to read as follows:

Under the Proposed Project, implementation of Mitigation Measures 4.4-1(a)~~,~~ and (b) ~~and (c)~~ would reduce the potential to disturb historic resources and 4.4-2(a), (b), and (c) and (d) would reduce the potential to disturb archaeological resources and human remains.

Page 5-19 – Revise a sentence in the second paragraph to read as follows:

Under the Proposed Project, implementation of Mitigation Measures 4.4-1(a)~~,~~ and (b) ~~and (c)~~ would reduce the potential to disturb historic resources and 4.4-2(a), (b), and (c) and (d) would reduce the potential to disturb archaeological resources and human remains.

Page 5-30 – Revise a sentence in the second paragraph to read as follows:

Under the Proposed Project, implementation of Mitigation Measures 4.4-1(a)~~,~~ and (b) ~~and (c)~~ would reduce the potential to disturb historic resources and 4.4-2(a), (b), and (c) and (d) would reduce the potential to disturb archaeological resources and human remains.

SECTION 5.6, ALTERNATIVES CONSIDERED BUT REJECTED

Page 5-7 – Revise the section to read as follows:

Section 15126.6 (c) of the *CEQA Guidelines* requires that an EIR identify those alternatives that were considered but rejected by the lead agency because they either did not meet the objectives of the project, were considered infeasible, or would not avoid or substantially lessen one or more significant effects of the Proposed Project.

Two additional alternatives, Alternative 4 and Alternative 5, were considered that focus on reducing significant impacts to Cultural Resources should there be future redevelopment of housing at the William Mead Homes site, but the alternatives were rejected as both were considered infeasible:

Alternative 4 – Historical Rehabilitation

Under this alternative, any future work on the William Mead Homes site in the Project Area would be required to be performed in conformance with the Secretary of Interior (SOI) Standards for Rehabilitation and the California Historical Building Code (CHBC).

To rehabilitate the existing buildings, significant interior and exterior repairs would be undertaken by professionals experienced in historic buildings. Replacing in-wall plumbing and electrical systems as well as foundation bolting would require opening up all interior walls and most floors. Exterior porches and eaves would be repaired in most cases and where replacement was required, original details would be matched in kind. Original windows (where remaining) would be retrofitted and/or reglazed to provide better insulating, air infiltration and acoustic performance. Where original windows are missing, new windows

would be installed that match the original materials and profiles. Floors containing asbestos are not considered character-defining and could be removed and replaced. Lead paint on the exterior of the building could be encapsulated or gently removed without damaging the overall integrity of walls. If structural work was required at exterior walls, the design would be carried out so as to maintain historic fabric, overall massing and details as much as possible.

Outside building footprints, the blocks are landscaped with lawns, mature trees of various species, and various ornamental plants. Landscaped areas are interspersed with concrete walkways and concrete-paved areas with common clothes lines. All of these features would be retained under this alternative but would require additional site work and cleanup.

Also, achieving required accessibility modifications would require exterior site work and substantial interior remodeling at the affected units. These types of repairs would need to be achieved without affecting character-defining features, which are largely located in its exterior details, overall massing, and site arrangement.

From a constructability standpoint, it is feasible to accomplish the required repairs to the William Mead Homes site in conformance with the SOI Standards for Rehabilitation per the Alternative 4 – Historical Rehabilitation description above.

However, from a regulatory standpoint, modifying the existing buildings to provide the number of code-required mobility accessible units is not feasible, as it does not meet Title 24 Section 8.26, which stipulates that in order to avoid discrimination, accessible units must be distributed throughout projects and sites with "a sufficient range of sizes and amenities" to provide the same choice to all people regardless of their abilities. Within the two- and three-bedroom units, renovations required to meet mobility access regulations would require complete internal reconfiguration and significant diminishment of normal, usable space. With no accessible two- or three-bedroom units, or with significantly diminished accessible two- and three-bedroom units, the site would not meet this requirement, thus exposing the designer and operator to significant legal liability even if the project made it through permitting. Generally speaking, units with accessibility modifications would be substandard based on normally accepted design standards for unit livability. No kitchen or bathrooms currently meet City, State or Federal accessibility standards for clearances, and alterations required to comply with the accessibility standards under Alternative 4 – Historical Rehabilitation would significantly negatively impact the livability of the units. As such, Alternative 4 was rejected due to infeasibility.

Alternative 5 – Partial Preservation

Under this alternative, various portions of the William Mead Homes site would be preserved and rehabilitated in compliance with SOI Standards. The site would be demolished in phases and redeveloped with new improved multi-family housing and amenities. Portions of the existing buildings would be maintained and improved with additional housing units and residential amenities.

There would be a total of 890 residential units on the site, including 769 affordable units and 121 units that would be preserved under this alternative. In addition, roughly 256,523 square-feet of non-residential uses would also be developed, which includes residential support uses and general amenities.

As stated previously, rehabilitation of historic structures on the William Mead Homes site is feasible from a constructability standpoint. Also, demolishing a particular portion of the William Mead Homes site and constructing new buildings is also feasible by the same measure. However, from a regulatory standpoint, demolishing a significant portion of a historic resource is not feasible in accordance with SOI Standards. In addition, this alternative would struggle to meet Title 24 Section 8.26 that requires mobility accessible units to be distributed throughout the site and with "a sufficient range of sizes and amenities" to provide the same choice to all people regardless of their abilities.

Newly constructed accessible units would exceed the quality and livability of those provided in the modified existing buildings, or alternatively all accessible units would be provided in the newly constructed portion of the site, thus, not meeting equitability and site distribution requirements stipulated by federal funding sources. As such, Alternative 5 was rejected due to infeasibility.

No other alternatives were identified that would feasibly attain most of the basic project objectives but would also avoid or substantially lessen the significant effects of the Proposed Project. Outside of a complete moratorium on new development, none of the impacts could be reduced to below a level of significance. Any demolition or construction activity in the Project Area would have the potential to adversely affect historical resources or generate significant construction-related noise. Moreover, as previously noted, limiting development in the Project Area may simply divert more growth and development to other areas of the City, thus increasing the potential for similar impacts in other areas and increasing overall Citywide and regional VMT and associated air pollutant and GHG emissions.

SECTION 6.0, OTHER CEQA SECTIONS

Page 5-7 – Revise the fifth paragraph to read as follows:

Mitigation Measures 4.4-1(a)~~,~~ and (b) ~~and (c)~~ would ensure that historic resources are identified and treated appropriately to avoid or minimize potential impacts. Mitigation Measures 4.4-2(a), 4.4-2(b), and 4.4-2(c), would provide for the recovery of any significant archaeological resources that cannot be preserved in place. These mitigation measures are procedural actions that would not result in physical changes in the environment that could result in secondary impacts.

3.0 RESPONSES TO COMMENTS ON THE DEIR

This section includes comments received during the circulation of the Draft Environmental Impact Report (DEIR) prepared for the Cornfield Arroyo Seco Specific Plan ("CASP") Update hereafter referred to as "Proposed Project".

The comment letters, included in Appendix B, were submitted to the City of Los Angeles by public agencies and private citizens. Responses to written comments received have been prepared to address the environmental concerns raised by the commenters and to indicate where and how the DEIR addresses pertinent environmental issues. Any changes made to the text of the DEIR correcting information, data, or intent, other than minor typographical corrections or minor working changes, are noted in Chapter 2, *Corrections and Additions*.

The DEIR was circulated for a 61-day public review period that began on July 20, 2023 and ended on September 18, 2023. The City of Los Angeles received eight comment letters during the DEIR public review period. Of these, seven letters included comments on the DEIR and one letter was a request for additional information and did not contain any comments on the DEIR or Proposed Project. An additional two letters on the DEIR were received after the review period for a total of 10 letters received.

The original bracketed comment letters are provided followed by a numbered response to each bracketed comment. Individual comments within each letter are numbered and the response is given a matching number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1-1, for example, indicates that the response is for the first issue raised in comment Letter No. 1). Table 3-1 lists the comments received on the DEIR.

Table 3-1 List of Commenters on the DEIR

Letter No.	and Commenter
1	Sahar Ghadimi, Air Quality Specialist, CEQA IGR, South Coast Air Quality Management District
2	Brian Olson, Senior Engineering Geologist, Seismic Hazards Program, California Geological Survey
3	Sissy Trinh and Jonathan Jager, Southeast Asian Community Alliance (SEACA)
4	Cassie Truong, Senior Transportation Planner, Los Angeles County Metropolitan Transportation Authority (Metro)
5	Rowena Lau, Division Manager, Wastewater Engineering Services, LA Sanitation and Environment (LASAN)
6	Katherine Rubin, Director of Corporate Environmental Affairs, Los Angeles Department of Water and Power (LADWP)
7	Chinatown Community for Equitable Development
8	Jennifer Turner acting for David Mayer, Environmental Program Manager South Coast Region, California Department of Fish and Wildlife (CDFW)
9	Jenny Scanlin, HACLA, Chief Development Officer
10	Sam Wang, Air Quality Specialist, CEQA IGR, South Coast Air Quality Management District

3.1 SUMMARY OF COMMENTS AND RESPONSES

LETTER NO. 1

Sahar Ghadimi, Air Quality Specialist, CEQA IGR, South Coast Air Quality Management District (SCAQMD)

August 2, 2023

Response 1-1

The commenter states that SCAQMD staff are in the process of reviewing the DEIR.

This comment is noted.

Response 1-2

The commenter requests an electronic copy of any live modeling and emissions calculation files (complete files, not summaries) that were used to quantify the air quality impacts from construction and/or operation of the Proposed Project as applicable, including the following:

- CalEEMod Input Files (.csv files);
- Live EMFAC output files;
- Any emission calculation file(s) (live version of excel file(s); no PDF) used to calculate the Project's emission sources (i.e., truck operations)

The above requested files were provided to SCAQMD electronically on August 9, 2023.

Response 1-3

The commenter states that the requested files may be sent via a Dropbox link by the end of the week. The commenter notes that without all files and supporting documentation, SCAQMD will be unable to complete a review of the air quality analyses in a timely manner and that delays in providing the supporting documentation will require additional time for review beyond the end of the comment period.

The requested information was sent to SCAQMD via email on August 9, 2023. No further requests for information were received from SCAQMD.

LETTER NO. 2

Brian Olson, Senior Engineering Geologist, Seismic Hazards Program, California Geological Survey (CGS)

August 17, 2023

Response 2-1

The commenter states that the DEIR discusses liquefaction and landsliding as a potential seismic hazard. The comment mentions much of the project area is in "a liquefaction zone" (page 4.6-3) and the slopes bordering the northern edge of the project area are "designated as landslide zones" (page 4.6-5); however, it is not clear what the source of these zones are. The commenter states the City should supplement this section with a discussion of the existing Earthquake Zones of Required Investigation (EZRI) for both liquefaction and earthquake-induced landsliding established by CGS for this area and consider providing figures depicting the locations of both types of zones. The commenter provides links for CGS maps and data. The commenter also states that cities and counties affected by EZRI must regulate certain development projects within them. The Seismic Hazards Mapping Act (1990) also requires sellers of real property (and their agents) within a mapped hazard zone to disclose that the property lies within such a zone at the time of sale.

See Chapter 2, *Corrections and Additions*, of this FEIR for revisions made to Section 4.6, *Geology*, of the DEIR (pages 4.6-3 through 4.6-6). These revisions provide additional detail regarding the source of information on liquefaction and landslide hazard zones within the Project Area including maps produced by CGS. These changes do not affect the DEIR analysis or impact conclusions, which remain less than significant. Additionally, the requirements of the Seismic Hazards Mapping Act (1990) are already discussed on page 4.6-15 of the DEIR.

Response 2-2

The commenter suggests that the City consider providing a discussion of the probability of large earthquakes in the region and that the discussion include earthquake probabilities from the third Uniform California Rupture Forecast model. The commenter is referred to Section 4.6, Geology and Soils, Pages 4.6-2 and 4.6-3 of the Draft EIR, for information on seismic hazards including surface rupture, groundshaking, liquefaction, and lateral spreading. Additionally, Page 4.6-19, of the Draft EIR, discusses potential impacts related to Project implementation as it relates to earthquakes.

The commenter also suggests that the proposed Specific Plan update discussion include earthquake probabilities from a third-party software provider. The aforementioned computer model provides estimates of the magnitude, location, and time-averages frequently of potentially damaging earthquakes in California. The time-independent model is strictly for informational purposes only and does not provide an accurate prediction of an earthquake event. The United States Geological Survey states that the computer model will be used by insurance companies to accurately predict premiums and overall level of insurance provided. While the model is useful for those purposes, the City does not feel that providing a prediction of an event that may never happen is appropriate with regard to this environmental analysis. Additionally, the commenter has not explained how the use of the computer model would result in a different impact conclusion.

LETTER NO. 3

Sissy Trinh and Jonathan Jager, Southeast Asian Community Alliance (SEACA)

September 18, 2023

Response 3-1

The commenter introduces SEACA and its mission, and notes that its members living in the area would be affected by the Proposed Project.

This comment is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 3-2

The commenter provides an overview of the purpose of and CEQA requirements for EIRs.

This comment is noted. No further response is required.

Response 3-3

The commenter states that the DEIR's less-than-significant conclusions regarding displacement lack sufficient evidence, and that a potentially significant impact related to displacement of existing CASP residents would occur. The comments following this statement further elaborate on this assertion.

As illustrated in the responses that follow, the DEIR's conclusions that impacts related to displacement would be less than significant are supported by substantial evidence.

Response 3-4

The commenter states that the DEIR does not adequately consider the risk of current CASP residents being displaced. The commenter notes that the DEIR states that displacement of some existing residences is reasonably foreseeable and concludes that the increased capacity for housing under the Proposed Project would offset such impacts. The commenter states that this may be true in the long run but ignores the time horizon of displacement.

The DEIR is a programmatic EIR for an update to the existing CASP. No specific development plans are included as part of the Project, and the Project would not require any existing housing to be demolished or reduced in order to be consistent with the Proposed Project's land use designations and zoning. In effect, existing development on the ground could be maintained and established uses could continue to operate. Nonetheless, the DEIR acknowledges that limited redevelopment of multi-family structures may occur due to the Proposed Project, which could result in displacement of some housing units and residents during construction. In limited instances, the Proposed Project could potentially cause a temporary reduction in housing stock as new buildings are built in place of older ones or as existing buildings are renovated or expanded. As noted in Section 4.12, *Population, Housing and Employment*, of the DEIR, the number of displaced units and residents, the timing of such activities, and locations of any replacement housing, if needed, is too speculative to determine.

While the EIR acknowledges that some displacement of existing housing units is likely to occur in the short-term, the analysis also notes that the City has adopted a number of policies aimed specifically at minimizing displacement of affordable housing, that the CASP Update would result in an overall

increase in housing, including affordable housing, available in the Project Area, and that therefore displacement of housing requiring construction of new housing elsewhere to replace the displaced housing is not anticipated. As noted on page 4.12-17 of the DEIR:

> Loss of affordable housing and displacement of low-income renters is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact (*Porterville Citizens v. City of Porterville*). Based on this, an impact from loss of affordable housing and displacement in this EIR will be an impact if it results in a physical impact to the environment, such as from construction of new housing elsewhere.

The Proposed Project is specifically aimed at accommodating current and anticipated housing demand as well as changing demographics in the Project Area. Although the number of existing units (including affordable units) that might be displaced by future development cannot be predicted with any degree of certainty, the Proposed Project would increase the reasonably expected development of housing in the Project Area by 900 percent (18,000 units), and thus there would be no need to construct new housing elsewhere. Therefore, the DEIR's conclusion that environmental impacts related to displacement of residences and the need to build new housing elsewhere would be less than significant remains valid.

Response 3-5

The commenter states that the DEIR does not adequately consider the potential for the Project to physically divide an established community.

As discussed on pages 4.10-20 and 4.10-21, the Proposed Project does not include major transportation infrastructure or alterations to roadways that would physically divide the Project Area, nor would the revised zoning under the Proposed Project result in substantially altered land use development patterns or increased development of incompatible uses that could divide the community. None of the permitted land uses under the Proposed Project would involve physical barriers, such as large, fenced areas, that would divide the community. The commenter does not provide any specific reasons that the Project would result in the physical division of communities within the Project Area and provides no substantial evidence supporting the need for a revised analysis or revised conclusions from those in the DEIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response 3-6

The commenter states that the DEIR's analysis is inadequate because it ignores the actual human impact of displacement and that it is not appropriate to claim that displacement will not exist simply because of a net gain in housing units or because communities will have more access to each other. The commenter claims that if current residents are forced out of their homes for any period of time, that creates potentially significant impacts on Land Use and Housing. The commenter also states that displacement of existing residents will physically divide an established community and that displacement, whether temporary or permanent, causes spillover effects that implicate other environmental areas of concern in ways that this DEIR does not address.

The DEIR does not claim that the Proposed Project will not cause any displacement. As stated on page 4.12-20 of the DEIR, "…reasonably anticipated development from the Proposed Project is anticipated to result in redevelopment that has the potential to result in the displacement of some existing housing units and residents" and as stated on page 4.12-21 of the DEIR, "displacement of some residences is a reasonably foreseeable result of development or redevelopment that could occur under the Proposed Project, should a property owner decide to utilize the full development potential of their site." Although

some displacement is reasonably anticipated to occur, as addressed above under Responses 3-4 and 3-5 and below under Responses 3-8 through 3-10, the Proposed Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, nor would the project divide an established community. This comment provides no substantial evidence supporting the need for a revised analysis in the Land Use or Population, Housing, and Employment Sections or revised conclusions from those in the DEIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response 3-7

The commenter states that existing state and local right of return and relocation laws do not stop displacement, that these laws merely give residents the opportunity to not be displaced, and that relocation services often do not actually provide the support residents need or prioritize relocating tenants within or in close proximity to their existing residences. The commenter states that the DEIR should be revised to conclude that the Project's cumulative impacts on Land Use and Planning and Population, Housing, and Employment are "potentially significant."

As described in Responses 3-4 through 3-6 and 3-8 through 3-10 that explain the relevant Project attributes, appropriate CEQA analysis required, allowable land uses, and applicable existing laws and policies, the DEIR's conclusions regarding the Project's less than significant impacts related to displacement (Planning and Population, Housing, and Employment) and division of an established community (Land Use and Planning) are supported with substantial evidence. Cumulative impacts related to these topics are described on pages 4.12-24 and 4.10-35 of the DEIR, respectively, and as addressed therein, the Proposed Project would not result in significant cumulative impacts related to these issues. This comment provides no substantial evidence supporting the need for a revised cumulative analysis in the Land Use or Population, Housing, and Employment Sections or revised conclusions from those in the DEIR. Therefore, there is no basis for additional analysis and no further response is required (State CEQA Guidelines Section 15204(c)).

Response 3-8

The commenter states that displacement caused by the Proposed Project could result in potentially significant impacts to transportation, greenhouse gas (GHG) emissions, air quality, and recreation. The commenter highlights potential secondary impacts of displacement, including additional vehicle miles traveled (VMT) and associated GHG and air pollutant emissions. For this reason, the commenter states that the DEIR's conclusion that the Proposed Project's impacts on displacement are less than significant is incorrect and the Proposed Project must include measures to mitigate these potentially significant impacts on displacement.

The growth forecasts used in the DEIR consider the effects of any displacement that may occur as a result of implementation of the CASP Update insofar as they represent the projected net increase in housing units, population, and jobs expected through 2040. The DEIR analyzes the total net increase in emissions of air pollutants and GHGs in Sections 4.2, *Air Quality*, and 4.7, *Greenhouse Gas Emissions*, respectively, considering the vehicle miles traveled (VMT) changes described in Section 4.15, *Transportation and Traffic*. As noted in Section 4.15, *Transportation and Traffic*, VMT forecasts utilize the City of Los Angeles Travel Demand Forecasting (TDF) Model and a Project Area Travel Demand Forecasting (TDF) Model for the analysis of the 2021 baseline year and the future 2040 scenario, as well as the use of the SCAG TDF Model for the analysis of the SCAG RTP/SCS to represent the region. These models all consider the synergistic effects of growth, including in a general sense the effects of redeveloping properties over time. While Section 4.12, *Population, Housing and Employment*, of the DEIR (Impact 4.12-2) acknowledges that some displacement of existing housing

units is likely to occur, the analysis also notes that the City has adopted a number of policies aimed specifically at minimizing displacement of affordable housing, that the Proposed Project would result in an overall increase in housing, including affordable housing, available in the Project Area, and that therefore displacement of housing requiring construction of new housing elsewhere to replace the displaced housing is not anticipated. For these reasons, although the air quality and GHG analyses consider displacement generally, any attempt to predict with any greater degree of certainty which affordable housing units might be displaced through 2040 and where displaced residents may live would be speculative. However, the Proposed Project is expected to provide more housing near areas well-served by public transit and areas where walking and biking are encouraged, thus having the overall effect of reducing VMT and associated per capita emissions of air pollutants and GHGs. As discussed in Section 4.2, *Air Quality*, future daily regional emissions associated with implementation of the Proposed Project are generally expected to decrease relative to existing conditions due largely to improvements in vehicular engine efficiency technologies and fuel pollutant concentrations, resulting from more stringent statewide regulations, that are projected to occur between existing conditions and 2040. Furthermore, Section 4.7, *Greenhouse Gas Emissions*, discusses how implementation of the Proposed Project would result in a 74 percent decrease in per capita GHG emissions due to a combination of state-mandated GHG emission reduction strategies as well as a lower service population VMT resulting from the location of jobs and housing being in close proximity to each other and the creation of substantial opportunities to use transit or other active transportation modes.

With respect to mitigation, the analysis of regional air quality impacts concludes that the Proposed Project's impact would be significant and unavoidable that mitigation beyond the Proposed Project's focus on mixed use and transit-oriented development and adherence to the City's green building standards on all new development is not feasible. For GHGs, significant impacts have not been identified; therefore, mitigation is not required. The Proposed Project outlines several anti-displacement measures, such as the Community Benefits Program to generate affordable housing in new development for all income levels within the Project Area. Future development projects using the CASP Community Benefits Program affordable housing incentives would be required to replace the existing affordable units on a development site in compliance with Assembly Bill (AB) 2222. Additionally, all new development in the Project Area will remain subject to the Affordable Housing Linkage Fee program. This program disincentivizes the loss of affordable units by requiring an additional fee if existing housing units are lost. A number of City regulations that are currently in place to minimize displacement of residents will continue under the Proposed Project, including:

- The citywide Residential Hotel Unit Conversion and Demolition Ordinance (RHO) offers protections for preservation of existing residential hotels and tenant rights and prohibits conversion or demolition of dwelling units in a residential hotel without approval from LAHD.
- The citywide Rent Stabilization Ordinance is intended to safeguard tenants from excessive rent increases. The Rent Stabilization Ordinance regulates replacement of demolished units, allowable rent increases, registration of rental units, legal reasons for eviction, and the causes for eviction requiring relocation assistance payment to tenants. Properties that contain two or more units, have a Certificate of Occupancy prior to October 1, 1978, and replacement units under LAMC Section 151.28 are subject to this ordinance.
- Proposition JJJ requires that all development projects of 10 or more residential units that require changes to the General Plan or other zoning make a percentage of the units affordable to low-income and working residents or pay a fee to fund affordable housing and enforce laws that protect renters.

The City's Housing Element also includes a range of policies aimed at protecting and developing affordable housing. Finally, the State has adopted a number of bills aimed at protecting and developing

affordable housing over the past several years. Notably, SB 330, the Housing Crisis Act, tightens the protections for development projects by limiting a jurisdiction's ability to change development standards and zoning applicable to the project once a preliminary application is submitted. The Proposed Project seeks to preserve the affordability of existing housing stock and minimize displacement. Projects using Density Bonus Law, or the CASP Community Benefits Program affordable housing incentives would be required to replace the existing affordable units on a development site in compliance with AB 2222. Additionally, the Housing Crisis Act of 2019, as amended by SB 8 (California Government Code Section 66300 et seq.), prohibits the approval of any proposed housing development project on a site that will require demolition of existing dwelling units or occupied or vacant "Protected Units" unless the project replaces those units at rents affordable to lower income tenants. These provisions will result in the retention of existing affordable units and a net gain of additional affordable units in the transit-rich areas of the Project Area. Therefore, the DEIR adequately studies and discloses the potential for significant impacts related to displacement, including secondary impacts, and no further changes to the DEIR are required.

Response 3-9

The commenter states that the DEIR inadequately analyzes the impacts of displacement and how such displacement impacts Land Use and Planning, Population, Housing and Employment, and other environmental factors under CEQA. The commenter suggests that mitigation measures or changes to the policies of the Proposed Project are necessary to ensure that the CASP Update's displacement impacts are truly "less than significant." The commenter recommends that the Proposed Project consider increasing affordability requirements to capture the additional land value created through the expansion of residential uses.

The Proposed Project includes strong affordable housing incentives, including non-residential use exemptions for 100 percent restricted affordable housing and supportive housing projects in the Urban Innovation and Urban Center zones and a Community Benefits Program that provides developers with the opportunity to develop additional floor area above the baseline permitted in exchange for providing restricted affordable housing. In addition to these incentives, future development in the Project Area would be required to comply with existing City policies for affordable housing, such as Proposition JJJ and the Affordable Housing Linkage Fee Ordinance. The DEIR determined that the Proposed Project would result in less than significant impacts with respect to displacement, land use and planning, and population, housing and employment, and the commenter does not provide substantial evidence supporting the need for a revised analysis or revised conclusions from those in the DEIR. Furthermore, the EIR is not intended or required to provide justification for the Proposed Project nor is it a vehicle for making changes to the Project absent one or more identified significant adverse environmental impact. As no significant environmental impacts related to displacement have been identified, no additional anti-displacement measures are required to be added to the CASP Update or the DEIR. Therefore, no further changes to the Proposed Project or DEIR are required.

Response 3-10

The commenter suggests four anti-displacement policies that the Proposed Project should implement, copied below:

- Rehouse displaced tenants as quickly and as close to home as possible: If a development will temporarily or permanently displace residents in the Plan area, the developer should first be required to offer any existing vacant units the developer already has that are within the CASP, at the tenant's existing rent. If the developer has no vacant units within the CASP, the developer should then be required to offer any existing vacant units outside the CASP, at the tenant's existing

rent, prioritizing those units closest to the Project Area. It should always be at the tenant's discretion whether they choose these offered replacement units, or the services of a relocation company to find them alternate accommodation.

- Displaced tenants should be able to avoid "double-moves": Even if a developer builds a replacement unit for which a displaced tenant has a right of return, that tenant should have the option of remaining in their relocated unit on the same terms and conditions as they would be entitled to in the replacement unit under that right of return.
- Relocation Assistance Consultants should prioritize proximity to the CASP: In the event a displaced tenant elects to utilize the services of the Relocation Assistance Consultant, the Consultant should use all reasonable efforts to provide replacement housing listings that are within the CASP or within 3 miles surrounding the CASP, and along the same public transit corridors as the housing the tenant is being displaced from.
- Displaced former CASP residents should have priority in newly constructed housing in the Plan area: Tenants who are displaced from the CASP should have the highest priority to obtain other affordable housing within the Plan area. The CASP should be revised to implement a local preference policy, which shall be written into the regulatory agreement for all future affordable housing developments in the CASP.

As described above under Responses 3-3 through 3-9, the Proposed Project includes measures to incentivize retaining existing affordable housing and the provisioning of new affordable housing, and future development within the Project Area would also be required to comply with existing City and State anti-displacement policies. As addressed above, the Proposed Project would not result in significant environmental impacts related to displacement, and, therefore, additional mitigation measures related to displacement are not required. However, these recommendations will be shared with City decisionmakers for their consideration.

Response 3-11

The commenter states that the Proposed Project represents an improvement over the existing version of the CASP but believes that it could include more components to balance neighborhood stabilization with increased development.

This comment will be shared with City decision makers, and specific concerns raised by the commenter are addressed above. No further response is required.

LETTER NO. 4

Cassie Truong, Senior Transportation Planner, Development Review Team, Metro

September 14, 2023

Response 4-1

The comment is an introduction to the comment letters, including Metro's mission and statutory responsibility. No further response is required.

Response 4-2

The commenter provides a brief summary of the Proposed Project. No further response is required.

Response 4-3

The commenter states that the Proposed Project and EIR should include updated information on existing and planned transit services and facilities within the Project Area. The commenter encourages the City to continue providing additional density for developments surrounding major transit stops. The commenter provides resources for identifying major transit stops in the Project Area.

Pages 4.15-13 and 4.15-14 of the DEIR provide information on public transit services, including Metro and LADOT services, within the Project Area. Figure 4.15-4 illustrates existing bus and rail lines, as well as bus stops and rail stations within the Project Area at the time the Notice of Preparation for the DEIR was published, consistent with the environmental baselines guidance provided in CEQA Guidelines section 15152(a).

Response 4-4

The commenter states that Metro is evaluating a new bicycle and pedestrian path along an approximately eight-mile stretch of the Los Angeles River from Elysian Valley through Downtown Los Angeles to the City of Maywood. Metro anticipates releasing the DEIR for that project in Spring 2024 with an anticipated operation date beyond 2028.

This information is noted and will be provided to City decision makers.

Response 4-5

The commenter provides information regarding the Connect US Action Plan to provide pedestrians and cyclists a safe and pleasurable passage to transit between Los Angeles Union Station, 1st/Central Station and adjacent historic neighborhoods. The commenter suggests the City should review this plan and explore the possibility of carrying through the recommended mobility improvements into the Project Area from adjacent corridors.

As addressed on pages 4.15-40 and 4.15-41, multi-modal improvements envisioned in the Proposed Project are intended to help minimize conflicts between pedestrians, bicyclists, and vehicles and enhance bicycle and pedestrian safety, consistent with the intent of applicable policies and programs including the City's Mobility Plan 2035, SCAG 2020-2045 RTP/SCS, and Metro's Connect US Action Plan. The DEIR determined that the Proposed Project would result in less than significant impacts with respect to conflicts with programs, plans, ordinances and policies addressing the circulation system and bicycle and pedestrian safety. The EIR is not intended or required to provide justification for the

Proposed Project nor is it a vehicle for making changes to the Project absent one or more identified significant adverse environmental impact. As no significant environmental impacts related to pedestrian and bicyclist mobility have been identified, no changes to the CASP Update or DEIR related to mobility are required.

Response 4-6

The commenter states that the EIR's transportation section should analyze potential impacts on Metro and Metrolink facilities within the Plan area and identify mitigation measures or project design features as appropriate. The commenter also recommends that the Proposed Project include a policy encouraging applicants to coordinate with Metro during City Planning review if the subject parcel is within a 100-foot buffer of Metro infrastructure. The commenter also states that such projects should comply with Metro's Adjacent Development Handbook.

The DEIR acknowledges the existing Metro facilities within the Project Area and discusses that the Proposed Project would facilitate active transportation and public transit use in the City by supporting new mixed-use development adjacent to existing public transit facilities and facilitating pedestrian and bicycle safety improvements. As noted on page 4.15-40 of the DEIR, "the Proposed Project describes the reasonably expected future development for a portion of the City and does *not* constitute a commitment to any project-specific development within the Project Area." No impacts to Metro facilities are anticipated. However, as stated on page 4.15-38 of the DEIR, "individual development projects will need to adhere to the requirements in LADOT's recently adopted Transportation Assessment Guidelines." The LADOT Transportation Assessment Guidelines includes a requirement for projects adjacent to Metro rights-of-way to coordinate with Metro. Any future development that occurs in the Project Area within 100 feet of Metro infrastructure would be required to coordinate with Metro and comply with the Adjacent Development Handbook.

Response 4-7

The commenter states that the Project Area includes and is adjacent to several transit stations and key bus lines. The commenter describes their support of development of commercial and residential properties near transit stations. The commenter encourages development projects and the City to orient pedestrian pathways towards nearby transit stations, install bicycle, pedestrian and public transit facilities and improvements, provide micro-mobility devices, enhance first- and last-mile connections, incorporate reduction or removal of minimum parking requirements, provide wayfinding signage, and install public art.

The Proposed Project would facilitate active transportation and public transit use in the City by supporting new mixed-use development adjacent to existing public transit facilities, implementing transit-oriented development standards such as no parking minimums and bicycle infrastructure requirements, and facilitating pedestrian and bicycle safety improvements. Any future development that occurs in the Project Area would be required to implement the standards included in the Proposed Project, as well demonstrate consistency with citywide policies such as Mobility Plan 2035 and the Vision Zero Action Plan.

LETTER NO. 5

Rowena Lau, Division Manager, Wastewater Engineering Services Division, LASAN

August 28, 2023

Response 5-1

The commenter states that upon review of the Proposed Project, LASAN has determined that the project is unrelated to sewers and does not require any hydraulic analysis. The commenter requests that LASAN is notified in the instance that additional environmental review is necessary for this project.

This comment is noted, and LASAN will continue to be notified of additional environmental review completed for the Proposed Project in accordance with the requirements of CEQA.

LETTER NO. 6

Katherine Rubin, Director of Corporate Environmental Affairs Division, LADWP

November 9, 2023

Response 6-1

The commenter provides an introduction to the comment letter and notes that the proposed Project may impact LADWP facilities because the Project Area includes sites adjacent to and within LADWP's Transmission Line Right of Way (TLRW).

The location of LADWP TLRW within the Project Area is noted. No further response is required.

Response 6-2

The comment relates to project-level review of proposed improvements within the TLRW. The Project is a plan level document, and no specific improvements are proposed at this time. LADWP is encouraged to comment on individual development projects as they are identified. As noted, individual development projects will be required to coordinate with LADWP and submit plans that meet LADWP's specifications. As no improvements are proposed at this time, no further response is required.

Response 6-3

The comment relates to project-level review of proposed improvements within the TLRW. The Project is a plan level document, and no specific improvements are proposed at this time. LADWP is encouraged to comment on individual development projects as they are identified. As noted, individual development projects will be required to coordinate with LADWP and submit plans that meet LADWP's specifications. As no improvements are proposed at this time, no further response is required.

LETTER NO. 7

Chinatown Community for Equitable Development

September 18, 2023

Response 7-1

The commenter introduces their organization and states that they have concerns regarding the Proposed Project and the DEIR.

This information is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 7-2

The commenter expresses that 100 percent affordable housing is required to prevent displacement in Chinatown and Lincoln Heights, neighborhoods with a large proportion of low-income residents. The commenter states that existing programs for affordable housing in the Project Area have not resulted in adequate affordable housing availability and have led to gentrification. The commenter states that the CASP Update incentives for affordable housing will not provide any meaningfully significant housing that is affordable to existing residents of Chinatown.

The Proposed Project is specifically aimed at encouraging affordable, mixed-income, and permanent supportive housing production, while supporting strategies to minimize displacement. Displacement is addressed in Section 4.12, *Population, Housing and Employment*, of the DEIR under Impact 4.12-2. Pages 4.12-22 and 4.12-23 of the DEIR acknowledge that indirect displacement of people, including those with lower incomes, is a concern citywide and within the Project Area. The rising cost of housing is currently a concern throughout the City, reflective of the shortage of housing in the City and the region as a whole. As population growth continues to outpace the production of housing units, the existing supply of housing is in higher demand which leads to higher rents/prices. Many renters are experiencing financial strain as average rents rise. While the majority of multi-family rental units in the Project Area is covenanted affordable, this occurrence may result in displacement of renters and may result in the need for people that live in the Project Area to move outside the Project Area or potentially outside of the City. The Proposed Project is specifically intended to expand the supply of housing for various income levels and thus help alleviate these displacement pressures. But there is no substantial evidence that there is a reasonable method to predict how many people may potentially be indirectly displaced in the Project Area, or the surrounding neighborhoods, over the Plan horizon, including factoring in the reasonably expected development that would occur with the Proposed Project.

The DEIR is a programmatic EIR for an update to the existing CASP. No specific development plans are included as part of the Project, and the Project would not require any existing housing to be demolished or reduced in order to be consistent with the Proposed Project's land use designations and zoning. In effect, existing development on the ground could be maintained and established uses could continue to operate. The Proposed Project would encourage retention of existing housing by focusing housing growth in predominantly industrial areas and away from existing residential neighborhoods. Nonetheless, the DEIR acknowledges that limited redevelopment of multi-family structures may occur due to the Proposed Project, which could result in the direct displacement of some housing units and residents during construction. In limited instances, the Proposed Project could potentially cause a temporary reduction in housing stock as new buildings are built in place of older ones or as existing buildings are renovated or expanded. As noted in Section 4.12, *Population, Housing and Employment*,

of the DEIR, the number of displaced units and residents, the timing of such activities, and locations of any replacement housing, if needed, is too speculative to determine.

While the EIR acknowledges that some displacement of existing housing units is likely to occur in the short-term, the analysis also notes that the City has adopted a number of policies aimed specifically at minimizing displacement of affordable housing, that the Proposed Project would result in an overall increase in housing, including affordable housing, available in the Project Area, and that therefore displacement of housing requiring construction of new housing elsewhere to replace the displaced housing is not anticipated. As noted on page 4.12-17 of the DEIR:

> Loss of affordable housing and displacement of low-income renters is a social and economic impact, which is not a CEQA impact unless it results in an indirect physical impact (*Porterville Citizens v. City of Porterville*). Based on this, an impact from loss of affordable housing and displacement in this EIR will be an impact if it results in a physical impact to the environment, such as from construction of new housing elsewhere.

The Proposed Project is specifically aimed at accommodating current and anticipated housing demand as well as changing demographics in the Project Area. Although the number of existing units (including affordable units) that might be displaced by future development cannot be predicted with any degree of certainty, the Proposed Project would increase the reasonably expected development of housing in the Project Area by 900 percent (18,000 units), and thus there would be no need to construct new housing elsewhere. Therefore, the DEIR's conclusion that environmental impacts related to displacement of residences and the need to build new housing elsewhere would be less than significant remains valid.

The Proposed Project includes several anti-displacement measures, such as the Community Benefits Program to generate affordable housing in new development for all income levels within the Project Area. Future Development projects using the CASP Community Benefits Program affordable housing incentives would be required to replace the existing affordable units on a development site in compliance with Assembly Bill (AB) 2222. The Proposed Project introduces a new Acutely Low Income category to the CASP, which targets households earning 0 to 15 percent of Area Median Income. Furthermore, the Proposed Project includes incentives specifically for 100 percent affordable housing projects, exempting such projects from non-residential use requirements that would otherwise be required for a market-rate or mixed-income development. Additionally, all new development in the Project Area will remain subject to the Affordable Housing Linkage Fee program. This program disincentivizes the loss of affordable units by requiring an additional fee if existing housing units are lost. A number of City regulations that are currently in place to minimize displacement of residents will continue under the Proposed Project, including:

- The citywide Residential Hotel Unit Conversion and Demolition Ordinance (RHO) offers protections for preservation of existing residential hotels and tenant rights and prohibits conversion or demolition of dwelling units in a residential hotel without approval from LAHD.
- The citywide Rent Stabilization Ordinance is intended to safeguard tenants from excessive rent increases. The Rent Stabilization Ordinance regulates replacement of demolished units, allowable rent increases, registration of rental units, legal reasons for eviction, and the causes for eviction requiring relocation assistance payment to tenants. Properties that contain two or more units, have a Certificate of Occupancy prior to October 1, 1978, and replacement units under LAMC Section 151.28 are subject to this ordinance.

- Proposition JJJ requires that all development projects of 10 or more residential units that require changes to the General Plan or other zoning make a percentage of the units affordable to low-income and working residents or pay a fee to fund affordable housing and enforce laws that protect renters.

The City's Housing Element also includes a range of policies aimed at protecting and developing affordable housing. Finally, the State has adopted a number of bills aimed at protecting and developing affordable housing over the past several years. Notably, SB 330, the Housing Crisis Act, tightens the protections for development projects by limiting a jurisdiction's ability to change development standards and zoning applicable to the project once a preliminary application is submitted. The Proposed Project seeks to preserve the affordability of existing housing stock and minimize displacement. Projects using Density Bonus Law, or the CASP Community Benefits Program affordable housing incentives would be required to replace the existing affordable units on a development site in compliance with AB 2222. Additionally, the Housing Crisis Act of 2019, as amended by SB 8 (California Government Code Section 66300 et seq.), prohibits the approval of any proposed housing development project on a site that will require demolition of existing dwelling units or occupied or vacant "Protected Units" unless the project replaces those units at rents affordable to lower income tenants. These provisions will result in the retention of existing affordable units and a net gain of additional affordable units in the transit-rich areas of the Project Area.

Response 7-3

The commenter states the substantial increase in population in the Project Area must be studied in the EIR for how it will affect the neighborhood including traffic, pedestrian safety, pollution, and public resources such as schools and public transit.

The increase in residents and employees that is anticipated to occur under the Proposed Project is identified in Section 4.12, *Population, Housing and Employment*, of the DEIR (4.12-17 through 4.12-20). This information is utilized in Section 4.13, *Public Services*, and Section 4.14, *Recreation*, of the DEIR to study the potential impacts to public resources including schools (pages 4.13-29 through 4.13-31), parks (pages 4.14-12 through 4.14-14), fire (pages 4.13-11 through 4.13-13) and police services (pages 4.13-21 through 4.13-23), and libraries (pages 4.13-35 and 4.13-36) due to the increase in population and employees within the Project Area. As disclosed therein, the expansion of existing facilities and or development of new facilities, including fire stations, police stations and schools, are anticipated to be required to accommodate the projected growth in the Project Area. The potential impacts of the proposed project on the transportation system, including public transit and pedestrian safety, are addressed in Section 4.15, *Transportation and Traffic*, of the DEIR (pages 4.15-38 through 4.15-47). As described therein, the Proposed Project would be consistent with City and regional goals to decrease VMT and encourage alternative modes of transportation, such as walking, biking, and public transit. The Proposed Project would improve pedestrian and bicyclist safety and reduce VMT in the Project Area. The potential for the Proposed Project to result in impacts related to air pollution, including due to increased population and employment in the Project Area, is addressed in Section 4.2, *Air Quality*, (pages 4.2-23 through 4.2-37) of the DEIR. The commenter provides no substantial evidence supporting the need for additional analysis or revised conclusions from those in the DEIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines Section 15204(c)).

Response 7-4

The commenter states that the Proposed Project would result in gentrification in Chinatown and promote unaffordable housing and cites the loss of legacy small businesses.

Refer to Response 7-2 above. Additionally, the Proposed Project includes policies and zoning standards that support legacy small businesses, including a Community Facilities incentive for projects that dedicate floor area to Legacy Small Business Area.

Response 7-5

The commenter expresses opposition to adoption of the Proposed Project.

Expressions of opposition to or support for the Proposed Project are made a part of the administrative record and forwarded to the decision-makers for their consideration in taking action on the Project.

LETTER NO. 8

Jennifer Turner, acting for: David Mayer, Environmental Program Manager, South Coast Region, CDFW

September 14, 2023

Response 8-1

The commenter describes CDFW's role as a Trustee Agency. The commenter states that their comments have been prepared pursuant to the CDFW's authority as a Trustee Agency under Fish and Game Code Section 711.7a and 1802, Public Resources Code Section 21070, and CEQA Guidelines Sections 15386a. The commenter also states that CDFW may need to exercise regulatory authority to the extent implementation of the Proposed Project may result in "take." The commenter states that CDFW recommends the Project obtain appropriate authorization under the Fish and Game Code.

This comment is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 8-2

The commenter describes the proposed Project, location, and objectives as outlined in the DEIR.

This comment is noted. No further response is required.

Response 8-3

The commenter states that CDFW offers the comments and recommendations provided in the letter to assist the City in adequately identifying the Proposed Project's significant, or potentially significant direct and indirect impacts on fish and wildlife (biological) resources. Responses 8-4 through 8-16 address the comments that follow and have been prepared with consideration of the commenter's authority over the project and responsibility of the lead agency to comply with the requirements of CEQA.

Response 8-4

The commenter states that the Project may impact over-wintering burrowing owls (*Athene cunicularia*). The commenter concurs with the DEIR that burrowing owl have "been known to nest in manmade objects such as pipes and riprap" and cites Mitigation Measure 4.3-2, which pertains to a pre-construction survey. The commenter states that the mitigation measure, as presented, may not reduce impacts to a level less than significant if burrowing owls are detected. The commenter further states there is no mitigation measure requiring the replacement of lost burrowing owl habitat. As discussed in Impact 4.3-1, implementation of Mitigation Measure 4.3-1 and 4.3-2 would reduce potential impacts to burrowing owl to a less-than-significant level by ensuring that active nests are identified and avoided, as necessary to avoid the loss of any burrowing owl habitat. Moreover, Mitigation Measure 4.3-2(c) has been added to the EIR further reduce impacts to burrowing owls:

> Mitigation Measure 4.3-2(c) Burrowing Owls
>
> Prior to the initiation of ground-disturbing activities within any phase of the Project resulting in direct impacts to potential habitat, the Project Applicant shall perform a preconstruction survey of the Project area for burrowing owls no further out then 14 days prior to construction

activities. The preconstruction survey shall be conducted by a qualified biologist. If grounddisturbing activities are delayed or suspended for more than 14 days after the preconstruction survey, the Project site shall be resurveyed for burrowing owls. If owls are determined to be present within or adjacent to the Project site during the preconstruction survey, the Project applicant shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan prior to commencing grounddisturbing activities. The Project applicant shall contact CDFW and submit a final Burrowing Owl Mitigation Plan for approval. The preconstruction survey and mitigation plan shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation, 2012. Though nesting is not anticipated, should eggs or fledglings be discovered in any owl burrow, the burrow cannot be disturbed (pursuant to CDFW guidelines) until the young have hatched and fledged (matured to a stage that they can leave the nest on their own). Occupied burrows shall not be disturbed during the nesting season (February 1st through August 31st) and a non-disturbance buffer shall be demarcated within 500 feet of the burrowing owls' nest to avoid abandonment of the young. Personnel working on the Project, including all contractors working onsite, shall be instructed on the presence of occupied burrows, area sensitivity, and adherence to no-disturbance buffers.

With the imposition of Mitigation Measure 4.3-2(c), impacts would be reduced to a level less than significant if burrowing owls are detected and any potential loss in burrowing owl habitat as a result of the Proposed Project would be replaced.

Response 8-5

The commenter lists the criteria for a species as being considered a Species of Special Concern (SSC) and states that inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect.

The addition of Mitigation Measure 4.3-2(c) would mitigate impacts to burrowing owl to a less than significant level by including requirements for a preconstruction survey, impact assessment, mitigation plan, and habitat replacement. This comment is noted. No further response is required.

Response 8-6

The commenter recommends a specific mitigation measure for burrowing owl, which has been added to the EIR as Mitigation Measure 4.3-2(c). Impacts to burrowing owl are discussed in Impact 4.3-1. Mitigation for impacts to burrowing owl is also addressed in Mitigation Measure 4.3-1, which requires a biological resources assessment to identify biological resources and thus identify specific mitigation necessary for each project proposed within the specific plan area (Project Area). Updates to Mitigation Measure 4.3-1 to further address impacts to special status species include an analysis of impacts at the Project level.

Response 8-7

The commenter recommends a mitigation measure for compensatory mitigation of burrowing owl habitat. As discussed in Impact 4.3-1, the Project does not provide ideal or marginal habitat for burrowing owl. Although the Project Area may include manmade objects such as riprap or pipes for nesting, it does not include habitat and as such mitigation measures for habitat replacement is not necessary. Avoidance and minimization measures for burrowing owl within manmade objects are included in Mitigation Measures 4.3-2(a) and 4.3-2(c) as described in Response 8-4.

Response 8-8

The commenter states that the Project may impact several bat species, including western mastiff bat (*Eumops perotis californicus*) and big free-tailed bat (*Nyctinomops macrotis*). The commenter states that Project activities which include ground disturbing activities that may disturb areas that may provide foraging habitat. As discussed in Environmental Setting, the Project Area is fully urbanized, and generally lacks native biological habitat. The Los Angeles River and Arroyo Seco, as well as small portions of parks and open space, trees, and minor urban landscaping, are the only sources of biological habitat in and around the Project Area and are not changing with the Proposed Project.

As stated in Impact 4.3-1, neither of these special status bat species are expected to utilize these urban habitats, because their specific habitat components (e.g., high cliffs, rocky outcroppings and open and semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, and chaparral) are absent from the Project Area. Therefore, impacts to these species would not occur. Impacts to non-listed bat species protected under California Fish and Game Code (CFGC) would be mitigated to a less than significant level through surveys and creation of site-specific mitigation measures described in Mitigation Measure 4.3-1, Biological Resources Assessment. Impact 4.3-1 has been updated to include discussion of non-listed bat species as follows:

Non-listed bat species, protected under CFGC, may occur within the Project Area in trees with exfoliating bark, tree hollows, broad leafed trees, palm fronds, bridges, hollow beams, attics, and eaves of buildings. Bats typically have a maternity season (generally from April 1 through August 31) and maternity roosts will be situated in areas to raise young. Depending on the species, some bats may not migrate and will use the same roost year-round. Additionally, bats may go into torpor (a temporary hibernation) during colder months (generally November to February) where bats may not be detectable while they are in deep sleep, making any potential relocations or evictions more challenging during this time frame. Many non-listed bat species are adapted to human disturbance and may roost throughout the Project Area. As such, tree trimming or removal as well as removal of structures with suitable crevices in the Project Area would have the potential to disturb a roosting bat, which could constitute a violation of the CFGC. In addition to direct impacts to roosting bats, temporary, indirect impacts including excessive noise or dust could affect bats. Therefore, impacts to active non-listed bats would be *potentially significant* before mitigation.

Response 8-9

The commenter states that bats are considered non-game mammals and are protected under CFGC Section 4150 and California Code of Regulations Section 251.1. The commenter also states that certain bat species are considered SSC and are afforded protection under CEQA Guidelines Section 15065. This Section of the CEQA Guidelines also states that impacts to SSCs could require mandatory finding of significance. This comment is noted. No further response is required.

Response 8-10

The commenter suggests a mitigation measure to address impacts to bat species, including surveys to be incorporated into the EIR. Impacts to non-listed bat species would be mitigated through surveys and creation of site-specific mitigation measures discussed in Mitigation Measure 4.3-1 Biological Resources Assessment.

Response 8-11

The commenter suggests a mitigation measure to address impacts to maternity roosts. Impacts to non-listed bat species would be mitigated through surveys and creation of site-specific mitigation measures discussed in Mitigation Measure 4.3-1.

Response 8-12

The commenter recommends changes to Mitigation Measure 4.3-1 Biological Resources Assessment that include a complete assessment and impact analysis with emphasis upon identifying endangered, threatened, sensitive, regionally, and locally unique species, and sensitive habitat. They suggest that the impact analysis should include direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. They also note that the CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project site.

As discussed in Impact 4.3-2, no sensitive natural communities occur within the Project Area. Mitigation Measure 4.3-1 has been updated to require a review of biological resources with potential on the Project site and surrounding area, including species-specific surveys for sites that contain suitable habitat for protected and non-listed species, and preparation of a report that includes an impact analysis with emphasis on identifying endangered, threatened, sensitive, regionally, locally unique species, and sensitive habitat, and potential direct, indirect, and cumulative biological impacts with specific mitigation measures necessary to avoid those impacts. These changes to Mitigation Measure 4.3-1 will be included in Section 2, *Correction and Additions*, of this FEIR.

Further, the commenter recommends the biological resources assessment include the following:

a) Information on the regional setting and measures to address impacts to sensitive natural communities.

   As discussed in Impact 4.3-2, no sensitive natural communities occur within the Project Area.

b) A floristic-based assessment of special status plants and natural communities.

As discussed in Impacts 4.3-1, no special status plants have potential to occur on in the Project. As discussed in the Environmental Setting, the Project Area is fully urbanized, and generally lacks native biological habitat. The Los Angeles River and Arroyo Seco, as well as small portions of parks and open space, trees, and minor urban landscaping, are the only sources of biological habitat in and around the Project Area and are not impacted by the Proposed Project.

c) Floristic mapping and vegetation impact assessment.

As discussed in the Environmental Setting, the Project Area is fully urbanized, and generally lacks native biological habitat. The Los Angeles River and Arroyo Seco, as well as small portions of parks and open space, trees, and minor urban landscaping, are the only sources of biological habitat in and around the Project Area.

d) An assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by a Project, including a 9-quadrangle search of the CNDDB.

   As discussed above, Mitigation Measure 4.3-1 has been revised to indicate that the assessment of biological resources shall include each habitat type on site and within adjacent areas.

e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect.

Mitigation Measure 4.3-1 has been revised to indicate that the assessment of biological resources shall include a discussion of non-listed bat species.

f) A recent wildlife and rare plant survey.

Mitigation Measure 4.3-1 has been revised to include species specific surveys for protected species, should suitable habitat be observed during the site assessment.

Response 8-13

The commenter states that, per the California Code of Regulations (CCR) Title 14 Section 650, a Scientific Collecting Permit (SCP) is required to monitor project impacts on wildlife resources.

All tasks identified in Mitigation Measures 4.3-1 and 4.3-2 are required to be performed by a qualified and knowledgeable biologist with experience in the region. Pursuant to Section 650 of the CCR, a qualified biologist, by definition, would be someone who is in possession of an SCP for any activities that would require an SCP.

Response 8-14

The commenter states that CEQA requires information developed in EIRs and negative declarations be incorporated into a database (i.e., the California Natural Diversity Database [CNDDB]).

The following language has been incorporated into Mitigation Measure 4.3-1 to address this comment:

> If any observations of special status species are made during a biological resource assessment for individual projects, the biologist shall submit all observations of special status species to CNDDB and all observations of special status plant populations or sensitive communities to CDFW's Vegetation Classification and Mapping Program within 90 calendar days of the observation.

Response 8-15

The commenter states that rodenticides and second-generation anticoagulant rodenticides should be prohibited both during and over the life of the Project. However, all projects would be anticipated to adhere to current state laws (Assembly Bill 1788) that regulate the use of rodenticides.

LETTER NO. 9

Jenny Scanlin, Chief Development Officer, Housing Authority of the City of Los Angeles (HACLA)

October 13, 2023

Response 9-1

The commenter introduces their organization and states that they have concerns regarding the Proposed Project and the DEIR.

This information is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 9-2

The commenter notes that the William Mead site is a public housing community within the Project Site and is owned and managed by HACLA. HACLA is a responsible agency for a potential future project to redevelop the William Mead site and would be required to examine the redevelopment in light of the CASP Update EIR, as the programmatic EIR governing redevelopment of the CASP.

This information is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 9-3

The commenter states that the DEIR fails to adequately analyze or mitigate the impacts on historical resources, which reduces its utility for streamlining later activities within the CASP, such as redevelopment of the William Mead site. The commenter notes that the DEIR identifies significant and unavoidable impacts to historical resources within the Project Area but provides no analysis of the severity of such impacts or mitigation measures to reduce impacts. The commenter states that the DEIR is required to identify feasible mitigation measures to reduce impacts to historical resources, and that HACLA has provided feasible mitigation measures to the City previously.

The DEIR is a programmatic EIR for an update to the existing CASP. No specific development plans are included as part of the Project, and the Project would not require any existing structures to be demolished in order to be consistent with the Proposed Project's land use designations and zoning. In effect, existing development on the ground could be maintained and established uses could continue to operate. Nonetheless, the DEIR acknowledges that redevelopment of structures may occur due to the Proposed Project, which could result in significant and unavoidable impacts to existing historical resources within the Project Area.

HACLA is exploring the potential future redevelopment of housing on the William Mead site, which is currently developed with a public housing complex that was constructed in 1941-1942 and has been previously determined eligible for listing in the National Register of Historic Places (NRHP) with the California State Historic Preservation Officers (SHPO) concurrence (see Appendix C – William Mead Homes Project Cultural Resources Impact Report). Redevelopment of the William Mead site, which may occur due to the Proposed Project, could entail the demolition of existing structures on the site which are historical resources and could therefore result in significant and unavoidable impacts to this historical resource. To provide analysis on the severity of such impacts if the William Mead site were to be redeveloped and the existing designated structure were to be demolished, and to identify feasible mitigation measures to reduce such impacts to historical resources, Section 4.4, *Cultural Resources*, of

the EIR has been updated to include discussion of the William Mead site, as reflected in Chapter 2, *Corrections and Additions*, of this FEIR.

While impacts to historical resources from the Proposed Project would be significant and unavoidable, if HACLA pursues a project to demolish the existing structures, the following Mitigation Measures 4.4-1(a) and 4.4-1(b), would be feasible and would reduce impacts to the greatest extent feasible relative to the potential future redevelopment of the William Mead Homes site:

> 4.4-1(a) Interpretive Display
>
> HACLA, as lead agency and Applicant, shall retain a qualified historian or architectural historian meeting the Secretary of the Interior's Qualification Standards (NPS 1983) in coordination with the City of Los Angeles Office of Historic Resources to prepare content for an interpretive display in a portion of the project site which will be open to the public. The interpretive display shall be completed and installed prior to the issuance of occupancy permits for the new development. It shall include a brief history of William Mead Homes and present its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the project which led to the demolition of the historical resource. The display shall be professionally written, illustrated, and designed, and shall include the website address associated with the informational website created by implementation of Mitigation Measure 4.4-1(b). The Interpretive Display may be rotated amongst publicly accessible spaces located throughout the project site with approval by HACLA. This mitigation measure shall only apply if and when redevelopment of the William Mead Homes site occurs.
>
> 4.4-1(b) Informational Website
>
> HACLA shall add to their existing website a section dedicated to the history of William Mead Homes and public housing in Los Angeles within six months of the issuance of a grading permit for the project. The website shall be maintained by HACLA and shall provide content on the history of William Mead Homes, the significance of public housing in the C ity, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of the site within the context of public housing in the City. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's Professional Qualifications Standards for history or architectural history and shall be periodically updated, as needed, if new scholarly information related to the history or significance of William Mead Homes and public housing become available following the initial publishing of the website. This mitigation measure shall only apply if and when redevelopment of the William Mead Homes site occurs.

Response 9-4

The commenter provides example mitigation measures for historical resources that have been utilized in an EIR for another specific plan within the City of Los Angeles. The example mitigation measures include a requirement that the preservation, rehabilitation, restoration, reconstruction, or adaptive reuse of historical resources meet the U.S. Secretary of the Interior's Standards for Rehabilitation to the extent feasible. Additionally, a requirement for a site-specific historical resources assessment to determine whether a property is a historic resource is included as an example mitigation measure. The commenter also states that CEQA recognizes that documenting a historical resource can serve as

sufficient mitigation. The commenter encourages the City to include similar mitigation measures for historical resources in the CASP Update EIR.

As noted in Section 4.4, *Cultural Resources*, of the DEIR, as a policy matter, the City finds that requiring additional review of projects otherwise undergoing discretionary review is undesirable based on the requirements it would place on City resources and the delay it would result in for projects. Additionally, as a policy matter, the City finds that it is undesirable to put additional regulations or processes on ministerial projects involving historical resources that are designated under the HCM or identified in the 2011 Project Area Survey. However, Mitigation Measures 4.4-1(a) and 4.4-1(b), which require documentation of a historical resource through an interpretive display and informational website respectively, have been added to the EIR relative to the potential future redevelopment of the William Mead Homes site, as they have been found to be feasible.

Response 9-5

The commenter states that Chapter 5, *Alternatives*, of the DEIR states that "implementation of Mitigation Measures 4.4-1(a), (b) and (c) would reduce the potential to disturb historic resources (See Draft EIR, pp. 5-19, 5-31, 6.3)", but no historical resources mitigation measures are included in the DEIR. The commenter suggests that the DEIR be revised and recirculated to remove contradictory information and include feasible mitigation measures for historical resources.

This error has been corrected and Mitigation Measures 4.4-1(a) and 4.4-1(b) have been added to the EIR to reduce the potential for impacts to historical resources. Chapter 5 Section 5.5, *Alternatives Comparative Impacts Analysis*, and Chapter 6 Section 6.0, Other CEQA Considerations, have been revised accordingly to correct the error and reflect the addition of these two mitigation measures, as reflected in Chapter 2, *Corrections and Additions*, of this FEIR. The impact remains significant and unavoidable with site specific mitigation measures added to reduce the impacts to the extent feasible.

Response 9-6

The commenter suggests that the DEIR does not examine feasible alternatives that would avoid or substantially reduce impacts to historical resources, as required by CEQA. The commenter suggests inclusion of a Historic Preservation Alternative that focuses on substantially reducing impacts to historical resources and would still attain most of the Project objectives.

Discussion on two additional alternatives, Alternative 4 (Historical Rehabilitation) and Alternative 5 (Partial Preservation), has been added to Section 5.6, *Alternatives Considered but Rejected*, of the EIR. The two alternatives discussed are limited to reducing impacts to historical resources should there be future redevelopment of the William Mead Homes site. Under Alternative 4, any future work on the William Mead Homes site in the Project Area would be required to be performed in conformance with the Secretary of Interior (SOI) Standards for Rehabilitation and the California Historical Building Code (CHBC), while under Alternative 5, certain portions of the existing buildings would be maintained while other portions would be demolished and reconstructed in phases should there be redevelopment of the William Mead Homes site. Pursuant to Section 15126.6 (c) of the *CEQA Guidelines*, both alternatives were rejected from further consideration because they were deemed infeasible, as further discussed and reflected in Chapter 2, *Corrections and Additions*, of this FEIR.

Response 9-7

The commenter provides a concluding statement regarding the lack of feasible mitigation measures and range of alternatives in the DEIR.

As discussed above, Mitigation Measures 4.4-1(a) and 4.4-1(b), which require documentation of a historical resource through an interpretive display and informational website respectively, have been added to the EIR relative to the potential future redevelopment of the William Mead Homes site only. A discussion on two additional alternatives that are limited to reducing impacts to the William Mead Homes site should the site be redeveloped was added to the FEIR, along with discussion as to why the additional alternatives, including a Historical Rehabilitation alternative and a Partial Preservation alternative, were rejected from further consideration due to infeasibility.

LETTER NO. 10

San Wang, Program Supervisor, CEQA IGR, South Coast Air Quality Management District (SCAQMD)

September 15, 2023

Response 10-1

The commenter introduces their organization and states that they have concerns regarding the Proposed Project and the DEIR.

This information is noted, and specific concerns raised by the commenter are addressed below. No further response is required.

Response 10-2

The commenter states that the lead agency has not provided any analysis for emissions related to localized significance thresholds for operational activities.

As stated in SCAQMD's Final Localized Significance Threshold Methodology, the LSTs screening table only applies to regional projects if specific projects are identified. The specific locations, size, distance to sensitive receptors, and details of future Project Area operational activity are unknown. Therefore, it would be speculative to assess the impacts of on-site operational emissions. This is the same as performing dispersion modeling without specific project details.

Subtracting the operational area and energy source emissions from 2040 with the Proposed Project and Existing emission scenarios, we could get the average on-site emission for a 10-acre project by dividing the net emission by 60. With this approach, the average on-site operational emission would be 5.7 lbs./day for nitrogen oxides (NO_x), 23.5 lbs./day for carbon monoxide (CO), 2.1 lbs./day for coarse particulate matter (PM_{10}), and 0.5 lbs/day for fine particulate matter ($PM_{2.5}$), which would be below the LST thresholds for 5 acre or more sites within 25 meters from receptors. However, this analysis is speculative without specific data for future individual projects, and impacts would remain significant and unavoidable, as disclosed in the DEIR. As individual projects are developed towards the 2040 buildout year, energy efficiency on individual projects will improve; therefore, this analysis is conservative. Further, individual projects would be required to assess localized operational impacts and the Proposed Project has implemented mitigation to the extent feasible with current information.

Response 10-3

The commenter states that Tier 4 technology may not be the cleanest technology when construction occurs later for individual projects and that Off-Road Tier 5 equipment should be considered.

As stated in Mitigation Measure 4.2-2, Construction Emissions Reduction, the Proposed Project would require construction equipment equipped with Tier 4 technology for equipment over 50 horsepower or alternative fuels where applicable. These are the current technology and mitigation measures available to reduce emissions from equipment exhaust to the maximum extent feasible. The Proposed Project could implement Tier 5 technology or zero emission technology when economically feasible and available during the Proposed Project's lifetime. However, without specific projects identified, construction details, and when the cleaner technology would hit the market and provide emissions reduction, it would be speculative to determine impacts and whether the technology would be available to reduce impacts.

Response 10-4

The commenter states that even though the Proposed Project consists of approximately 600-acres of land being developed over the course of 17-years of construction, the DEIR does not analyze the scenario of overlapping between the construction and operational activities.

Without specific projects identified from the Proposed Project and construction details, it is speculative when operations would occur to overlap emissions and the number of emissions generated from operational sources. Moreover, combining emissions that would be generated during construction activities and future operational conditions is not standard procedure when analyzing air quality impacts under CEQA. Nowhere in the District's *Handbook* is there an indication that this combination of emissions would be appropriate. Furthermore, the Air Quality Significance Thresholds for construction and operation were derived using different methods, and the *Handbook* explicitly recognizes that operations begin following the completion of construction activities. It is not practically possible to estimate the incremental increase in daily construction acreage, daily construction equipment activity, or daily construction truck trips throughout the entirety of the Project Area that would result from implementation of the Proposed Plan.

Response 10-5

The commenter states that permits from the SCAQMD are required if the implementation of the Proposed Project would require the use of new stationary equipment, such as internal combustion engines.

Without specific project details, making assumptions on the number, size, and operating hours of new stationary equipment within the Project Area is speculative. Individual projects would be required to make those assumptions and determine health impacts on sensitive receptors. As described under Impact 4.2-3 of the DEIR, the use of generators and toxic compounds within the Project Area would be permitted through SCAQMD and its permitting process, and Regulation XIV would ensure that equipment associated with new industrial facilities would not generate TAC emissions exceeding the SCAQMD standards or adversely affect sensitive land uses.

Response 10-6

The commenter expresses their gratitude for being included in the public review process and that they are available to speak with, if needed.

This information is noted, and specific concerns raised by the commenter are addressed above. No further response is required.

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

4.1 Introduction

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act (CEQA). It is the intent of this program to: (1) verify satisfaction of the required mitigation measures of the EIR (EIR); (2) provide a methodology to document implementation of the required mitigation measures; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) use existing review processes wherever feasible.

This MMRP describes the procedures for the implementation of the mitigation measures adopted for the Proposed Project. The MMRP for the Proposed Project will be in place through the planning horizon of the Project or until the Proposed Project and EIR are updated again, whichever is later. The City of Los Angeles Department of City Planning (DCP) staff and staff of other City Departments (e.g., Department of Building and Safety) shall be responsible for administering the MMRP activities or delegating them to consultants, or contractors. The Monitoring or Enforcing Agencies identified herein, at their discretion, may require a project applicant or operator to pay for one or more independent environmental monitor(s) to be responsible for monitoring implementation of mitigation measures (e.g., City building inspector, project contractor, certified professionals, etc., depending on the requirements of the mitigation measures) required of project applicants or operators. Monitors would be hired by the City or by the applicant or operator at the City's discretion.

Each mitigation measure is identified in **Table 4-1, Mitigation Monitoring and Reporting Program Matrix,** and is categorized by environmental topic and corresponding number with identification of:

- The Implementing Party or Agency – this is in most cases, the applicant for individual projects who will be required to implement most of the measures.
- The Enforcement and Monitoring Entity – this is the entity or entities that will monitor each measure and ensure that it is implemented in accordance with this MMRP.
- Monitoring Phase and Monitoring Actions – this is the timeframe that monitoring would occur and the criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure is implemented.

Many of the mitigation measures are implemented through the environmental protection measures/standards either through the CASP or EPM Handbook process. Others may be implemented through the imposition of conditions of approval subject to the City's authority to condition the applicable entitlement for any subsequent environmental review pursuant to *State CEQA Guidelines* Sections 15162, 15163, 15164, or 15168, or tiered clearance to this EIR, pursuant to the procedures in *State CEQA Guidelines* Section 15152 or streamlining CEQA Clearance as permitted in PRC Sections 21083, 21094.5, 21155-21155.2, 21155.4 or CEQA Guidelines Sections 15183 or 15183.3.

For mitigation measures implemented through the CASP or the EPM Handbook, the following shall occur:

- Adopt environmental standards or protection measures to implement, and that are consistent with, the mitigation measures; and

- Require projects to substantially conform with all applicable environmental standards or environmental protection measures, subject to the discretion of the enforcing and monitoring agency; and
- Authorize any City implementing, monitoring or enforcing agency, to require the applicant to hire an outside consultant (which may or shall be subject to City approval) to monitor and certify compliance with the environmental standards or protection measures, or develop any other administrative procedures to ensure compliance with the environmental standards or protection measures, including but not limited to requiring the applicant to sign acknowledgement of environmental standards or protection measures and provide affidavit committing to comply with applicable environmental standard or protection measures, and maintain records for certain period of time and hold records available for City inspection to demonstrate compliance.

For the mitigation measures implemented through the CASP or EPM Handbook, they may do the following:

- Provide for the modification or a deletion of an environmental standard or protection measure subject to the following: The Planning Director may determine substantial conformance with the environmental standard in his or her reasonable discretion. If the Planning Director cannot find substantial conformance, an environmental standard may be modified or deleted if the Planning Director, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines, including sections 15162 and 15164, by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the environmental standard. Any addendum or subsequent CEQA clearance shall explain why the mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the project design feature or mitigation measure. Under this process, the modification or deletion of a mitigation measure shall not require a modification to any project discretionary approval unless the Planning Director or decisionmaker also finds that the change to the environmental standard requires a modification or other entitlement under the LAMC or other City ordinance or regulation.

Mitigation measures imposed as a condition of approval shall be imposed with a MMRP that may include the following provisions:

- This MMRP shall be enforced throughout all phases of development projects subject to the mitigation measures. The Applicant shall be responsible for implementing each mitigation measure and shall be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that each project design feature and mitigation measure has been implemented. The Applicant shall maintain records demonstrating compliance with each project design feature and mitigation measure. Such records shall be made available to the City upon request. Further, specifically during the construction phase (including excavation, grading and demolition) and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by DCP, who shall be responsible for monitoring implementation of mitigation measures during grading and construction activities consistent with the monitoring phase and frequency set forth in this MMP. The Construction Monitor shall also prepare documentation of the Applicant's compliance with the mitigation measures during grading and construction every 90 days. The documentation must be signed by the Applicant and Construction Monitor and be maintained by the Applicant. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency/Entity any non-compliance with the mitigation measures within two business days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall

be appropriately addressed by the Enforcement Agency/Entity. Until five years after all mitigation measures are fully satisfied, the Applicant and Owner shall maintain all records of mitigation measure compliance (e.g., reports, studies, certifications, verifications, monitoring or mitigation plans) and make the records available for the City's inspection within three business days of the City requesting the records. All records related to grading and construction shall be maintained on the construction site during grading and construction and shall be immediately available for inspection by the City or by the Construction Monitor. The Applicant/Owner shall also sign a Statement of Compliance, in a form approved by the City, prior to issuance of any building permit, committing to compliance with all applicable mitigation measures.

All development projects shall be in substantial conformance with the mitigation measures contained in this MMRP. The Enforcement Agency/Entity may determine substantial conformance with mitigation measures in the MMRP in their reasonable discretion. If the Enforcement Agency/Entity cannot find substantial conformance, a mitigation measure may be modified or deleted if the Enforcement Agency/Entity, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines, including sections 15162 and 15164, by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the mitigation measures. Any addendum or subsequent CEQA clearance shall explain why the mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the project design feature or mitigation measure. Under this process, the modification or deletion of a mitigation measure shall not require a modification to any project discretionary approval unless the Director of Planning also finds that the change to the mitigation measures results in a substantial change to the Project or the non-environmental conditions of approval.

Table 4-1 Mitigation Monitoring and Reporting Program Matrix

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
Impact – Air Quality			
4.2-2 Construction Emissions Reduction <u>AQ1-1: Dust Control Compliance with SCAQMD Rule 403</u> a. Applicability Threshold Any Project whose construction activities involve the use of construction equipment and require a permit from City of Los Angeles Department of Building and Safety. b. Standard Consistent with SCAQMD Rule 403, best available dust control measures shall be implemented during Ground Disturbance Activities and active construction operations capable of generating dust. <u>AQ1-2: Equipment</u> a. Applicability Threshold Any Project whose construction activities involve the use of construction equipment and require a permit from LADBS. b. Standard Maintain construction equipment in good, properly tuned operating condition, as specified by the manufacturer, to minimize exhaust emissions. Documentation demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications shall be maintained per the proof of compliance requirements in Subsection I.D.6 of the Environmental Protection Measures Handbook. All construction equipment shall achieve emissions reductions that are no less than what could be achieved by a Tier 3 diesel emissions control strategy for a similarly sized engine as defined by California Air Resources Board regulations. <u>AQ1-3: Vehicle Idling Limit and Notification Signs</u> a. Applicability Threshold Any Project whose construction activities involve the use of construction vehicles and require a permit from LADBS.	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
b. Standard Vehicle idling during construction activities shall be limited to five minutes as set forth in the California Code of Regulations, Title 13, Section 2449. Signs shall be posted in areas where they will be seen by vehicle operators stating idling time limits. <u>AQ1-4: Non-Diesel Fueled Electrical Power</u> a. Applicability Threshold Any Project whose construction activities involve the use of construction equipment and require a permit from LADBS. b. Standard Electricity from power poles rather than temporary gasoline or diesel-powered generators shall be used To the Extent Available and Feasible. <u>AQ1-5: Emissions Standards for Off-Road Construction Equipment Greater than 50 Horsepower</u> a. Applicability Threshold Any Project whose construction activities involve the use of construction equipment, require a permit from LADBS, and involve at least 5,000 cubic yards of on-site cut/fill on any given day. b. Standard All off-road diesel-powered construction equipment equal to or greater than 50 horsepower shall meet the U.S. Environmental Protection Agency's (USEPA) Tier 4 emission standards during construction or use alternative fuels (such as compressed natural gas, liquid petroleum gas, unleaded gasoline, or electricity.). Operators shall maintain records of all off-road equipment associated with Project construction to document that each piece of equipment used meets these emission standards per the proof of compliance requirement in Subsection I.D.6. In lieu of compliance with the above requirement, an air quality study prepared in accordance with the SCAQMD's Air Quality Handbook may be provided by the Applicant or Owner demonstrating that Project construction activities would not exceed the SCAQMD's regional and localized construction thresholds.			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
AQ1-6: Use of Low Polluting Fuels a. Applicability Threshold Any Project whose construction activities involve the use of construction equipment, require a permit from LADBS, and involve at least 5,000 cubic yards of on-site cut/fill on any given day. b. Standard Construction equipment less than 50 horsepower shall use low polluting fuels (i.e., compressed natural gas, liquid petroleum gas, unleaded gasoline, or electricity). In lieu of compliance with the above requirement, an air quality study prepared in accordance with the SCAQMD's Air Quality Handbook may be provided by the Applicant or Owner demonstrating that Project construction activities would not exceed the SCAQMD's regional and localized construction thresholds. AQ1-7: Emission Standards for On-Road Haul Trucks a. Applicability Threshold Any Project whose construction activities involve the use of construction equipment, require a permit from LADBS, and involve more than 90 round-trip haul truck trips on any given day for demolition debris and import/export of soil. b. Standard Construction haul truck operators for demolition debris and import/export of soil shall use trucks that meet the California Air Resources Board's (CARB) 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of nitrogen oxides (NO_X) emissions. Operators shall maintain records of all trucks associated with Project construction to document that each truck used meets these emission standards per the proof of compliance requirements in Subsection I.D.6 of the Environmental Protection Measures Handbook.			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
In lieu of compliance with the above requirement, an air quality study prepared in accordance with the SCAQMD's Air Quality Handbook may be provided by the Applicant or Owner demonstrating that Project construction activities would not exceed the SCAQMD's regional and localized construction thresholds. <u>AQ1-8: Routes for On-Road Haul Trucks</u> a. Applicability Threshold Any Project whose construction activities involve the use of construction vehicles and require a permit from LADBS. b. Standard Construction contractors shall reroute construction trucks away from congested streets or Sensitive Uses, as feasible. The burden of proving that compliance is infeasible shall be upon the Applicant or Owner. Where avoiding Sensitive Uses and congested streets altogether is infeasible, routing away from Sensitive Uses shall be prioritized over routing away from congested streets.			
Impact – Biological Resources			
4.3-1 Biological Resources Assessment For individual projects that will include disturbance of vegetation, trees, structures, or other areas where biological resources could be present, a qualified biologist shall be retained by the applicant to conduct an initial site assessment. The assessment will include a review of biological resources with potential on the Project site and surrounding area. It will include a search of the California Natural Diversity Database (CNDDB) maps to determine where sightings have occurred or habitats for nesting birds, or bat species have previously been identified. A site assessment survey may be required for sites that are in proximity to areas where habitats for nesting birds or bat species occur. Species-specific surveys may be required for sites that contain suitable habitats for nesting birds or non-listed bat species. Species-specific surveys for sites that contain suitable habitat for protected species and non-listed bat species, and preparation of a report that includes an impact analysis with emphasis on identifying endangered, threatened, sensitive, regionally, locally unique species, and sensitive habitat, and potential direct, indirect, and cumulative	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
biological impacts with specific mitigation measures necessary to avoid those impacts. If any observations of special status species or non-listed bat species are made during a biological resource assessment for individual projects, the biologist shall submit all observations of special status species and non-listed bat species to CNDDB and all observations of special status plant populations or sensitive communities to CDFW's Vegetation Classification and Mapping Program within 90 calendar days of the observation.			
4.3-2(a) Pre-Construction Bird Nest Surveys and Avoidance For projects in the Project Area, a pre-construction survey for nesting bird, including ground nest birds, survey shall be conducted no more than ten days prior to initiation of ground disturbance and vegetation removal activities for any grading or construction activity initiated during the bird nesting season (February 1 – August 31). The nesting bird pre-construction survey shall be conducted on foot by a qualified biologist and shall include a 100-foot buffer around the construction site. If nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities or vegetation removal shall occur within this buffer until the biologist has confirmed that breeding/ nesting is completed and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A Statement of Compliance signed by the Applicant and Owner is required to be submitted to LADBS at plan check and prior to the issuance of any permit. Any survey, report, construction monitoring, and implementation of protective measures conducted shall be documented by a qualified biologist and shall be provided to the City upon request. Best management practices (BMPs) to avoid disturbing nesting birds, including burrowing owls, during construction include visually check all sections of pipe or other construction materials for the presence of	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
wildlife before moving and capping or elevating the ends of all pipes or similar construction materials while storing to prevent wildlife from entering them.			
4.3-2(b) Notification All project applicants will be notified of and shall include on their plans an acknowledgement of the requirement to comply with the federal MBTA and CFGC to not destroy active bird nests and of best practices recommended by qualified biologist to avoid impacts to active nests, including checking for nests prior to construction activities during February 1-August 31 and what to do if an active nest is found, including inadvertently during grading or construction activities. Such best practices shall include giving an adequate construction and grading buffer to avoid the active nest during construction.	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety
4.3-2(c) Burrowing Owls Prior to the initiation of ground-disturbing activities within any phase of the Project resulting in direct impacts to potential habitat, the Project Applicant shall perform a preconstruction survey of the Project area for burrowing owls no further out then 14 days prior to construction activities. The preconstruction survey shall be conducted by a qualified biologist. If grounddisturbing activities are delayed or suspended for more than 14 days after the preconstruction survey, the Project site shall be resurveyed for burrowing owls. If owls are determined to be present within or adjacent to the Project site during the preconstruction survey, the Project applicant shall prepare an Impact Assessment and Burrowing Owl Mitigation Plan prior to commencing grounddisturbing activities. The Project applicant shall contact CDFW and submit a final Burrowing Owl Mitigation Plan for approval. The preconstruction survey and mitigation plan shall be conducted in accordance with the CDFW Staff Report on Burrowing Owl Mitigation, 2012. Though nesting is not anticipated, should eggs or fledglings be discovered in any owl burrow, the burrow cannot be disturbed (pursuant to CDFW guidelines) until the young have hatched and fledged (matured to a stage that they can leave the nest on their own). Occupied burrows shall not be disturbed during the nesting season (February 1st through August 31st) and a non-disturbance buffer shall be demarcated within 500 feet of the	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
burrowing owls' nest to avoid abandonment of the young. Personnel working on the Project, including all contractors working onsite, shall be instructed on the presence of occupied burrows, area sensitivity, and adherence to no-disturbance buffers.			
Impact – Cultural Resources			
If the contributing building and structures on the William Mead Homes site are demolished, HACLA will be required to implement the following Mitigation Measure. **4.4-1(a) Interpretive Display** HACLA, as lead agency and Applicant, shall retain a qualified historian or architectural historian meeting the Secretary of the Interior's Qualification Standards (NPS 1983) in coordination with the City of Los Angeles Office of Historic Resources to prepare content for an interpretive display in a portion of the project site which will be open to the public. The interpretive display shall be completed and installed prior to the issuance of occupancy permits for the new development. It shall include a brief history of William Mead Homes and present its significance in the contexts of public and defense worker housing in Los Angeles during the Second World War and public housing design related to the Garden City and Modern movements, and a description of the project which led to the demolition of the historical resource. The display shall be professionally written, illustrated, and designed, and shall include the website address associated with the informational website created by implementation of Mitigation Measure 4.4-1(b). The Interpretive Display may be rotated amongst publicly accessible spaces located throughout the project site with approval by HACLA. This mitigation measure shall only apply to any future redevelopment of the William Mead Homes site.	Prior to issuance of grading or building permits submittal of plans with measure on plans; collection of acknowledgement by owner; subject to inspection by DBS; enforcement of violations available through LAMC at City discretion.	Housing Authority of the City of Los Angeles (HACLA)	City of Los Angeles, Department of Building and Safety
If the contributing building and structures on the William Mead Homes site are demolished, HACLA will be required to implement the following Mitigation Measure. **4.4-1(b) Informational Website** HACLA shall add to their existing website a section dedicated to the history of William Mead Homes and public housing in Los Angeles	Prior to issuance of grading or building permits submittal of informational website link; collection of acknowledgement by owner; subject to inspection by DBS; enforcement of violations available through LAMC at City discretion.	Housing Authority of the City of Los Angeles (HACLA)	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
within six months of the issuance of a grading permit for the project. The website shall be maintained by HACLA and shall provide content on the history of William Mead Homes, the significance of public housing in the city, and notable examples of public housing architecture and site planning. It shall include links to other scholarly sources of information on the history and design of the site within the context of public housing in the city. The new website section shall be professionally written, illustrated, and designed. The content shall be prepared by persons meeting the Secretary of the Interior's Professional Qualifications Standards for history or architectural history and shall be periodically updated, as needed, if new scholarly information related to the history or significance of William Mead Homes and public housing become available following the initial publishing of the website. This mitigation measure shall only apply to any future redevelopment of the William Mead Homes site.			
4.4-2(a) Archaeological Resources Evaluation and Avoidance/Recovery <u>CR1-1: Inadvertent Discovery</u> a. Applicability Threshold Any Project that requires a permit for grading or excavation. b. Standard If a possible archaeological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Archaeologist has been retained to evaluate the find in accordance with National Register of Historic Places and California Register of Historical Resources criteria. The Qualified Archaeologist may adjust this avoidance area, ensuring appropriate temporary protection measures of the find are taken while also considering ongoing construction needs in the surrounding area. Temporary staking and delineation of the avoidance area shall be installed around the find in order to avoid any disturbance from construction equipment. Ground Disturbance Activities may continue unimpeded on other portions of the site outside the specified radius. Any potential archaeological resource or associated materials that are uncovered shall not be moved or collected by anyone other than an archaeological monitor or qualified archaeologist unless the materials	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
have been determined to be non-unique archaeological resources, as defined in Public Resources Code Section 21083.1(h), by the qualified archaeologist. The qualified archaeologist shall determine if the resources are unique archaeological resources as defined in Public Resources Code Section 21083.2(g). Consistent with Public Resources Code Section 21083.2, the handling, treatment, preservation, and recordation of unique archaeological resources should occur as follows: • The find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. • When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a Qualified Archaeologist. • Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by a Qualified Archaeologist. A report that describes the resource(s) and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Archaeologist according to current professional standards and maintained pursuant to the proof of compliance requirements in Subsection I.D.6. If appropriate, the report should also contain the Qualified Archaeologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply.			
4.4-2(b) Archaeological Assessment Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner. • Archaeological, Paleontological, and Tribal Cultural Resources Notice: Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a	Prior to issuance of excavation or grading permits: verify receipt of acknowledgement from applicant.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
criminal violation to destroy those resources. These regulations include, but are not limited to: California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor." Public Resources Code Section 5097.5(a) states: "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." A violation of Section 5097.5 is a misdemeanor subject to a fine up to $10,000 and/or a year in jail, and potential restitution. The following best practices are recognized by archaeologists and environmental consultants to ensure archaeological resources are not damaged during grading, excavation, or other Ground Disturbance Activities: • Records Search. A cultural resources records search should be requested from and conducted by the California Historical Resources Information System's (CHRIS) South Central Coastal Information Center (SCCIC) located at California State University, Fullerton to determine whether any cultural resources have been previously identified on or within a 0.5-mile radius of the Project site. The results of this records search shall be used as an indicator of the archaeological sensitivity of the Project site. • A qualified archaeologist shall be retained and use all reasonable methods, consistent with professional standards and best practices, to determine the potential for archaeological resources to be present on the Project site. If the qualified archaeologist determines there is a medium to high potential that archaeological resources may be located on the Project site and it is possible that such resources will be impacted by the Project, the qualified archaeologist shall advise the Applicant and Owner to retain an Archaeological monitor to observe all Ground Disturbance			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
Activities within those areas identified as having a medium to high potential in order to identify any resources and avoid potential impacts to such resources. • Monitoring. An archaeological monitor should monitor excavation and grading activities in soils that have not been previously disturbed in order to identify and record any potential archaeological finds and avoid potential impacts to such resources. In the event of a possible archaeological discovery, the archaeological monitor shall notify a qualified archaeologist. The Archaeological monitor has the authority to temporarily halt earthwork activities. • Handling, Evaluation, and Preservation. Any archaeological resource materials or associated materials that are uncovered shall not be moved or collected by anyone other than an archaeological monitor or qualified archaeologist unless they have been determined to be nonunique archaeological resources, as defined in Public Resources Code Section 21083.1(h) by a qualified archaeologist. A qualified archaeologist shall determine if the resources are unique archeological resources as defined in Public Resources Code Section 21083.2(g). Consistent with Public Resources Code Section 21083.2, the handling, treatment, preservation, and recordation of unique archaeological resources should occur as follows: • The find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. • When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study should occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a qualified archaeologist. • If recommended by the qualified archaeologist, the resource(s) shall be curated by a public, non-profit institution with a research interest in the material, such as the Natural History Museum of Los Angeles County or another appropriate curatorial facility for educational purposes.			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
• Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by a qualified archaeologist.			
4.4-2(c) Zanja Madre <u>CR2-1: Zanja Madre HAER Documentation</u> a. Applicability Threshold Any project that requires a permit for grading or excavation and that is located within one mile of the currently known and mapped segments of the Zanja system. b. Standard Projects within 500 feet of the currently mapped known segments of the Zanja system (see Appendix F) have increased likelihood of encountering segments of the Zanja system during construction. The Zanja system includes the Zanja Madre and its outbranching secondary Zanja segments. If possible, segments of the Zanja system are uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a qualified archaeologist has been retained to inspect and evaluate the find. The qualified archaeologist may adjust this avoidance area, ensuring appropriate temporary protection measures of the find are taken while also considering ongoing construction needs in the surrounding area. Temporary staking and delineation of the avoidance area shall be installed around the find in order to avoid any disturbance from construction equipment. Ground Disturbance Activities may continue unimpeded on other portions of the site outside the specified radius. At a minimum, and even if avoided, should the find be determined to be related to the Zanja system, the qualified archaeologist shall prepare a memo and complete all relevant State of California Department of Parks and Recreation (DPR) DPR 523 forms documenting the find. If the qualified archaeologist, having evaluated the find, determines that the find retains integrity, documentation consistent with the standards and guidelines established the Historic American Engineering Record (HAER) shall be undertaken and transmitted to the Library of Congress before any alteration, demolition, construction, or removal activity may occur within the determined	During grading/construction: field as needed, verify that field verify that work is halted to assess possible archaeological resources and avoidance buffers are demarcated and enforced. Once find has been determined to be related to the Zanja system: review and approve the memo and all relevant DPR 523 forms documenting the find. Once find has been determined to retain integrity: review and approve the documentation that is consistent with HAER standards and guidelines. Submit documentation to the Library of Congress, SCCIC, and DCP prior to any alteration, demolition, construction, or removal activity within the avoidance area. Verify that appropriate treatments determined by the archaeologist for the find are implemented.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
avoidance area. Documentation shall include narrative records, measured drawings, and photographs in conformance with HAER Guidelines. The found segments shall also be mapped using Geographic Information Systems (GIS) or 3D mapping technology in order to contribute to the existing record of the location and extent of the Zanja system as a whole. At minimum, GIS data shall include the geographic coordinates and depth of all portions of the find. All records, including geographic data, georeferenced photographs, and information about the depth of the find shall be submitted to City Planning. Report documentation and GIS files shall additionally be provided to the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. In addition to HAER documentation, if determined appropriate by the qualified archaeologist, one or more of the following specific treatments shall be developed and implemented based on potential California Register eligibility criteria or the significance of the find as a unique archaeological resource: • Treatment Under Criterion 1: Treatment shall include interpretation of the Zanja Madre System for the public. The interpretive materials may include, but not be limited to, interpretive displays of photographs and drawings produced during the HAER documentation, signage at the Zanja Madre alignment, relocating preserved segments in a publicly accessible display, or other visual representations of Zanja alignments through appropriate means such as a dedicated internet website other online-based materials. At a minimum, the interpretive materials shall include photographs and drawings produced during the HAER documentation, and signage. These interpretive materials shall be employed as part of Project public outreach efforts that may include various forms of public exhibition and historic image reproduction. Additionally, the results of the historical and archaeological studies conducted for the Project shall be made available to the public through repositories such as the local main library branch or with identified non-profit historic groups interested in the subject matter. The interpretive materials shall be prepared at the expense of the Project applicant, by professionals meeting the Secretary of the Interior standards in history or			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
historical archaeology. The development of the interpretive materials shall consider any such materials already available to the public so that the development of new materials would add to the existing body of work on the historical Los Angeles water system, and to this end, shall be coordinated, to the extent feasible and to the satisfaction of the Department of City Planning. The interpretive materials shall include a consideration of the Zanja Madre segment located on the Project Site in relation to the entire Zanja system. The details of the interpretive materials, including the content and format, and the timing of their preparation, shall be completed to the satisfaction and subject to the approval of the Department of City Planning. • Treatment Under Criterion 2: No additional work; archival research about important persons directly associated with the construction and use of Zanja Madre would be addressed as part of HAER documentation. • Treatment Under Criterion 3: No additional work; HAER documentation is sufficient. • Treatment Under Criterion 4: No additional work; archaeological data recovery and HAER documentation are sufficient. • Treatment as a unique archaeological resource, as defined by PRC Section 21083.2(g): Same as Criterion 1 treatment.			
Impact – Paleontological Resources			
4.6-6(a) Paleontological Resources For all discretionary projects that are excavating at least two subterranean levels below the ground surface, the following measures shall be conducted to identify and avoid potential impacts to such resources: • Retention of Qualified Paleontologist. The project applicant shall retain a Qualified Paleontologist prior to excavations. The Qualified Paleontologist shall direct all mitigation measures related to paleontological resources. A qualified professional paleontologist is defined by the Society of Vertebrate Paleontology (SVP) standards (SVP 2010) as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable	Prior to project approval: verify that the applicant has conducted surveys and searches of databases and records and as needed, identified methods to avoid impacts to significant paleontological resources; measures on plans.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010). • Paleontological Worker Environmental Awareness Program. Prior to the start of construction, the Qualified Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. • Paleontological Monitoring. Full-time paleontological monitoring shall be conducted during the initial phases of ground disturbing construction activities (i.e., grading, trenching, foundation work) within sediments with a high paleontological sensitivity. Paleontological monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources and meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. The duration and timing of the monitoring shall be determined by the Qualified Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City of Los Angeles. If the Qualified Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions once the full depth of excavations has been reached, they may recommend that monitoring be reduced to periodic spot-checking or ceased entirely. Monitoring shall be reinstated if any new ground disturbances are required, and reduction or suspension shall be reconsidered by the Qualified Paleontologist at that time. In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil(s) is (are) scientifically significant, the Qualified Paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources:			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
○ Salvage of Fossils. If fossils are discovered, the paleontological monitor shall have the authority to halt or temporarily divert construction equipment within 50 feet of the find until the monitor and/or lead paleontologist evaluate the discovery and determine if the fossil may be considered significant. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits. ○ Treatment of Paleontological Resources. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Paleontologist. • Final Paleontological Mitigation Report. Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) including their scientific significance, and recommendations. The report shall be submitted to the City of Los Angeles. If the monitoring efforts produced fossils, a copy of the report shall also be submitted to the designated museum repository.			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
4.6-6(b) Treatment of Paleontological Resources CR3-1: Inadvertent Discovery a. Applicability Threshold Any Project that requires a permit for grading or excavation. b. Standard If a probable paleontological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Paleontologist has been retained to evaluate the find in accordance with the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. Any paleontological materials that are uncovered shall not be moved or collected by anyone other than a Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor. If cleared by the Qualified Paleontologist, Ground Disturbance Activities may continue unimpeded on other portions of the site. The found deposit(s) shall be treated in accordance with the Society of Vertebrate Paleontology's Standard Procedures. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by Qualified Paleontologist. A report that describes the resource and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Paleontologist according to current professional standards and maintained pursuant to the proof of compliance requirements in Subsection I.D.6. If appropriate, the report should also contain the Qualified Paleontologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply.	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion. If resources found and have been properly assessed and processed: review and approve the report that documents assessment, processing of resources, and recommending actions.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
4.6-6(c) Notification of Intent to Excavate Language Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner. <u>Archaeological, Paleontological, and Tribal Cultural Resources Notice:</u> Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to: • California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value, whether situated on private lands or within any public park or place, is guilty of a misdemeanor." • Public Resources Code Section 5097.5(a) provides: "A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." A violation of Section 5097.5 is a misdemeanor subject to a fine up to $10,000 and/or a year in jail, and potential restitution. The following best practices are recognized by paleontologists and environmental consultants to ensure paleontological resources are not damaged during construction or Ground Disturbance Activities: • A paleontological resources records search shall be requested from and conducted by the Natural History Museum of Los Angeles County to determine whether any paleontological resources have been previously identified on or near the Project site. The results of this records search shall be used as an indicator of the paleontological sensitivity of the Project site. • A Qualified Paleontologist shall be retained and use all reasonable methods, consistent with professional standards and best practices,	Prior to issuance of excavation or grading permits: verify receipt of acknowledgement from applicant.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
to determine the potential for paleontological resources to be present on the Project site. • If the Qualified Paleontologist determines there is a high potential that paleontological resources may be located on the Project site and it is possible that such resources will be impacted by the Project, the Qualified Paleontologist or his/her designated representative such as a Paleontological Monitor shall observe all Ground Disturbance Activities within those areas identified as having an undetermined or high potential in order to identify any resources and avoid potential impacts to such resources. In the event of a possible paleontological discovery, the Qualified Paleontologist or Paleontological Monitor shall have the authority to temporarily halt earthwork activities within an appropriate radius of the find, as determined by the Qualified Paleontologist, necessary to protect the resource or other potential resources on or near the Project site. Temporary flagging shall be installed around the find in order to avoid any disturbance from construction equipment. • Prior to the start of construction, the Qualified Paleontologist or his/her designee shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. • If paleontological resources are uncovered (in either a previously disturbed or undisturbed area), all work should cease in the area of the find until a Qualified Paleontologist has evaluated the find in accordance with federal, state, and local guidelines, including the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP, 2010). • If fossils are discovered, a Qualified Paleontologist shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist has the authority to temporarily direct, divert or halt construction activity to ensure the fossil(s) can be			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
removed in a safe and timely manner. Handling and disposition of fossils is done at the direction and guidance of a Qualified Paleontologist. • Personnel of the Project should not collect or move any paleontological materials or associated materials. • If cleared by the Qualified Paleontologist, construction activity may continue unimpeded on other portions of the Project site. • Construction activities in the area where resources were found may commence once the identified resources are properly assessed and processed by a Qualified Paleontologist, and the Qualified Paleontologist clears the site for construction activity.			
Impact – Hazards and Hazardous Materials			
4.8-4(a) Database Review, Investigation, and Remediation. HM1-2: Environmental Site Assessment a. Applicability Threshold Any Project that requires a grading, excavation, or building permit from LADBS and which is: • Located on or within 500 feet of a Hazardous Materials site listed in any of the following databases: o State Water Resources Control Board GeoTracker (refer to https://geotracker.waterboards.ca.gov); o DTSC EnviroStor (refer to https://www.envirostor.dtsc.ca.gov/public); o DTSC Hazardous Waste Tracking System (refer to https://hwts.dtsc.ca.gov); o LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at https://www.lafd.org/fire-prevention/cupa/public-records); o Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California Accidental Release Prevention inventory lists at https://fire.lacounty.gov/public-records-requests);	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion. Prior to issuance of grading, excavation, or building permits: review and approve the soil samples submitted documenting levels of lead and arsenic on site. If no recognized elevated levels are identified, no further documentation is required. If the soil sample results indicate the need for remediation, review and approve a remediation plan. If oversight or approval from a regulatory agency is required, verify agency sign off on remediation plan and that a No Further Action letter has been issued.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
○ SCAQMD Facility Information Detail (refer to https://xappprod.aqmd.gov/find); or • Located on or within 500 feet of a Hazardous Materials site designated as a Resource Conservation and Recovery Act (RCRA) Small Quantity Generator or Large Quantity Generator (refer to the USEPA Envirofacts database at https://enviro.epa.gov/index.html); or • Located in an Oil Drilling District (O) or located on or within 50 feet of a property identified as having an oil well or an oil field (active or inactive) by the California Geologic Energy Management Division (refer to https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx); or • Located on land currently or previously designated with an industrial use class or industrial zoning, in whole or in part; or • Located on land currently or previously used for a gas station or dry cleaning facility. Or: • The Applicant or Owner are aware or have reason to be aware that the Project site was previously used for an industrial use, gas station or dry cleaner. And: • The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or site conditions. b. Standard A Phase I Environmental Site Assessment shall be prepared by a Qualified Environmental Professional in accordance with State standards/guidelines and current professional standards, including the American Society for Testing and Materials' (ASTM) Standard Practice for Environmental Site Assessments, to evaluate whether the site, or the surrounding area, is contaminated with hazardous substances from any past or current land uses, including			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
contamination related to the storage, transport, generation, or disposal of toxic or Hazardous Waste or materials. If the Phase I identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I, a Phase II Environmental Site Assessment shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II Environmental Site Assessment(s) shall be maintained pursuant to the proof of compliance requirements in Section I.D.6 and made available for review and inclusion in the case file by the appropriate regulatory agency, such as the State Water Resources Control Board, the State Department of Toxic Substances Control, or the LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II Environmental Site Assessment or by the appropriate regulatory agency shall be implemented and, if required, a No Further Action letter shall be issued by the appropriate regulatory agency prior to issuance of any permit from LADBS, unless the regulating agency determines that remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval by a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained pursuant to the proof of compliance requirements in Section I.D.6.			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
4.8-4(b) Notification of Intent to Excavate Language For all discretionary projects not subject to Mitigation Measure 4.8-4(a) that are seeking excavation or grading permits, the Department of Building and Safety shall obtain the following acknowledgement and affidavit from the applicant: • No known recognized soil or groundwater contamination exceeding regulatory action levels is present on-site. If contamination exceeding regulatory action levels is discovered during excavation, grading, or construction activities, the applicant and his/her/its contractors shall provide evidence of compliance with all applicable federal, state and local regulations for remediation of hazardous materials, including but not limited to notifying the appropriate oversight agency (e.g., DTSC, the Water Board, County Environmental Health) of the contamination, hiring a qualified environmental professional to conduct the necessary assessments and abatement (including soil sampling, preparing a remediation plan to adequately abate the hazardous materials, and ultimately obtaining necessary clearance letters from the oversight agency), and issuance of a No Further Action letter, if applicable, before obtaining an occupancy permit. If oversight or approval by a regulatory agency is not required, a qualified environmental professional shall provide written verification of compliance with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained pursuant to appropriate proof of compliance requirements.	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion. Prior to issuance of grading, excavation, or building permits: review and approve the soil samples submitted documenting levels of lead and arsenic on site. If no recognized elevated levels are identified, no further documentation is required. If the soil sample results indicate the need for remediation, review and approve a remediation plan. If oversight or approval from a regulatory agency is required, verify agency sign off on remediation plan and that a No Further Action letter has been issued.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
Impact – Noise			
4.11-1 Project-Specific Noise Study. NV1-6: Noise Study a. Applicability Threshold Any Project whose earthwork or construction activities involve the use of construction equipment and require a permit from LADBS; are located within 500 feet of Noise-Sensitive Uses; and have one or more of the following characteristics: • Two or more subterranean levels; • 20,000 cubic yards or more of excavated material • Simultaneous use of five or more pieces of construction equipment; or • Construction duration (excluding architectural coatings) of 18 months or more. Or any Project whose construction activities involve impact pile driving or the use of 300 horsepower equipment. b. Standard A Noise Study prepared by a Qualified Noise Expert shall be required and prepared prior to obtaining any permit by LADBS. The Noise Study shall characterize expected sources of earthwork and construction noise that may affect identified Noise-Sensitive Uses, quantify expected noise levels at these Noise-Sensitive Uses, and recommend measures to reduce noise exposure to the extent noise reduction measures are available and feasible, and to demonstrate compliance with any noise requirements in the LAMC. Specifically, the Noise Study shall identify noise reduction devices or techniques to reduce noise levels in accordance with accepted industry practices and in compliance with LAMC standards. Noise reduction devices or techniques shall include but not be limited to mufflers, shields, sound barriers, and time and place restrictions on equipment and activities. The Noise Study shall identify anticipated noise reductions at Noise-Sensitive Uses associated with the noise reduction measures. Applicants and Owners shall be required to implement and comply with all measures identified and recommended in the Noise Study.	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
The Noise Study and copies of any contractor agreements shall be maintained pursuant to the proof of compliance requirements in Section I.D.6.			
4.11-2(a) Vibration Control Plan NV2-1: Baseline Survey and Vibration Control Plan a. Applicability Threshold Any Project, with the exception of Projects limited to the construction of 2,000 square feet or less of floor area dedicated to residential uses, whose earthwork or construction activities: (1) involve the use of construction equipment, including Heavy Construction Equipment, that produces 0.12 PPV or more of vibration at a distance of 25 feet (see reference vibration levels in Appendix F); (2) require a permit from LADBS; and (3) which occur: • Within 25 feet of any building extremely susceptible to vibration damage, including unreinforced masonry buildings, tilt-up concrete wall buildings, wood-frame multi-story buildings with soft, weak or open front walls, and non-ductile concrete buildings, or a building that is designated or determined to be a historic resource pursuant to local or state law or that is determined to be potentially eligible for historic designation in a Historic Resources Survey; or • Within 15 feet of non-engineered timber and masonry buildings. Or any Project whose construction activities involve the use of pile drivers within 135 feet of any building extremely susceptible to vibration damage, including existing unreinforced masonry buildings, existing tilt-up concrete wall buildings, existing wood-frame multi-story buildings with soft, weak or open front walls, and existing non-ductile concrete buildings, or a building that is designated or determined to be a historic resource pursuant to local or state law or that is determined to be potentially eligible for historic designation in a Historic Resources Survey. b. Standard	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
Prior to demolition, grading/excavation, or construction, a Qualified Structural Engineer shall prepare a survey establishing baseline structural conditions of potentially affected structures and a Vibration Control Plan, which shall include methods to minimize vibration, including, but not limited to: • A visual inspection of the potentially affected structures to document (by video and/or photography) the apparent physical condition of the building (e.g., cracks, broken panes, etc.). • A shoring design to protect the identified structures from potential damage; • Use of drilled piles or a sonic vibratory pile driver rather than impact pile driving, when the use of vibrating equipment is unavoidable; • Use of rubber-tired equipment rather than metal-tracked equipment; and • Avoiding the use of vibrating equipment when allowed by best engineering practice.			
4.11-2(b) Best Management Practices for Vibration For projects that are not required to comply with mitigation measure 4.11-2(a), the City shall notify developers of the following best management practices to reduce damage to vibration-sensitive uses: • Impact pile drivers shall be avoided to eliminate excessive vibration levels. Drilled piles or the use of a sonic vibratory pile driver are alternatives that shall be utilized where geological conditions permit their use. • Construction activities shall involve rubber-tired equipment rather than metal-tracked equipment. The construction contractor shall manage construction phasing (scheduling demolition, earthmoving, and ground-impacting operations so as not to occur in the same time period), use low-impact construction technologies, and shall avoid the use of vibrating equipment when allowed by best engineering practices.	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
Impact – Tribal Cultural Resources			
4.16-1(a) Unanticipated Discovery of Tribal Cultural Resources CR4: Inadvertent Discovery a. Applicability Threshold Any Project that requires a permit for grading or excavation. b. Standard If a possible tribal cultural resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Tribal Monitor or Archaeological Monitor has been retained to evaluate the find. Following discovery, the Applicant or Owner shall immediately contact all Native American tribes that have informed the City of Los Angeles they are traditionally and culturally affiliated with the geographic area of the Project, as well as the Department of City Planning, Office of Historic Resources (OHR). If a Qualified Tribal Monitor or Archaeological Monitor determines, pursuant to Public Resources Code Section 21074(a)(2), that the object or artifact appears to be a potential tribal cultural resource, in its discretion and supported by substantial evidence, the Applicant and Owner shall provide any affected tribe a reasonable period of time, not less than five business days, to conduct a site visit and make recommendations to the Applicant or Owner and OHR regarding the monitoring of future Ground Disturbance Activities and the treatment and disposition of any discovered tribal cultural resources. The Applicant or Owner shall implement the tribe's recommendations if the Qualified Tribal Monitor or Archaeological Monitor reasonably concludes such recommendations are reasonable and feasible. Consistent with Public Resources Code Section 21083.2, the handling, treatment, preservation, and recordation of tribal cultural resources should occur as follows: • The find should be preserved in place or left in an undisturbed state unless the Project would damage the resource. • When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study should occur unless testing or studies already completed have	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a Qualified Tribal Monitor or Qualified Archaeologist. All collected artifacts and fieldwork notes, if not human remains or other mortuary objects, shall be curated at the Natural History Museum of Los Angeles County or another appropriate curatorial facility for educational purposes. If cleared by the Qualified Tribal Monitor or Archaeological Monitor, Ground Disturbance Activities may continue unimpeded on other portions of the site. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed. A report that describes the resource and its disposition, as well as the assessment methodology shall be prepared by the Qualified Tribal Monitor or Archaeological Monitor, according to current professional standards and maintained pursuant to the proof of compliance requirements in Subsection I.D.6. A copy of the report shall be submitted to OHR, the South Central Coastal Information Center at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File. If requested by the City, OHR may review and approve any monitoring or mitigation plan prior to implementation.			
4.16-1(b) Native American Consultation and Monitoring for Discretionary Projects All discretionary projects that involve ground disturbing activities in previously undisturbed soils, shall prepare a cultural resources assessment and do a record search with a study area of no less than 0.5 mile around the project area. Projects conducted in culturally and historically sensitive areas, as determined by a Qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeologist, should include a record search with a study area of no less than 1 mile around the project area. Notification shall be provided to California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project site and have submitted a written request to the Department of City Planning to be notified of projects in that area. Should projects have potential to impact cultural resources, as	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
determined during the environmental assessment or Tribal consultation, a Cultural Resources Monitoring Program (CRMP) shall be prepared by Qualified Archaeologist, in consultation with all interested Tribes, prior to the commencement of any and all ground disturbing activities for the Project, including any archaeological testing. The CRMP shall provide details regarding the process for infield treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources and shall be consistent with the treatment of unique archaeological resources in PRC 21083.2.			
4.16-1(c) Notices for Non-Discretionary Projects Projects Requiring Grading or Excavation. Prior to issuance of a permit for grading or excavation, LADBS shall issue the following notice(s) and obtain a signed acknowledgement that the notice(s) was received and read by the Applicant and Owner. <u>Archaeological, Paleontological, and Tribal Cultural Resources Notice:</u> Several laws regulate the treatment of archaeological, paleontological, and tribal cultural resources and make it a criminal violation to destroy those resources. These regulations include, but are not limited to: • California Penal Code Section 622.5 provides the following: "Every person, not the owner thereof, who willfully injures, disfigures, defaces, or destroys any object or thing of archeological or historical interest or value whether situated on private lands or within any public park or place, is guilty of a misdemeanor." Public Resources Code Section 5097.5(a) provides: "A person shall not knowingly or willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archeological, paleontological or historic feature, situated on public lands, except with the express written permission of the public agency having jurisdiction over the lands." A violation of Section 5097.5 is a misdemeanor subject to a fine up to $10,000 and/or a year in jail, and potential restitution. The following best practices are recognized by tribal monitors and environmental consultants to ensure that tribal	Prior to issuance of grading or building permits submittal of plans with measure on plans, collection of acknowledgement by owner and notice to contractors; subject to inspection by DBS; maintenance of records of compliance for at least five years after issuance of certificate of occupancy; enforcement of violations available through LAMC at City discretion.	Applicant for individual project	City of Los Angeles, Department of Building and Safety

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
cultural resources are not damaged during grading, excavation, or other Ground Disturbance Activities: • A Sacred Lands File (SLF) records search shall be requested from and conducted by the California Native American Heritage Commission (NAHC) to determine whether cultural resources associated with any Native American tribe(s) with traditional lands or cultural places located within or near the Project site have been previously identified or whether the Project area is considered sensitive for the presence of tribal cultural resources. • All tribes listed on the NAHC's Native American Contact List included with the SLF search shall be contacted, informed of the Project, and given an opportunity to provide input. If the tribe provides substantial evidence of a potential discovery of tribal cultural resources within the Project site and requests monitoring of Project excavation, grading or other Ground Disturbance Activities, a Qualified Tribal Monitor or Archeological Monitor shall be retained. • A Qualified Tribal Monitor or Archeological Monitor shall observe Ground Disturbance Activities within those areas identified in the records search as sensitive for the presence of tribal cultural resources in order to identify resources and avoid potential impacts to such resources. In the event of a possible discovery of a tribal cultural resource, the Qualified Tribal Monitor or Archeological Monitor shall have the authority to temporarily halt earthwork activities within the appropriate radius of the find, as determined by the Qualified Tribal Monitor or Archeological Monitor to ensure the find or any other potential tribal cultural resources on or near the Project site is not damaged. • If tribal resources are uncovered (in either a previously disturbed or undisturbed area), all work should cease in the appropriate radius determined by the Qualified Tribal Monitor or Archeological Monitor and in accordance with federal, state, and local guidelines. • Any find shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Qualified			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
Tribal Monitor or Archeological Monitor and in accordance with federal, state, and local guidelines. • The location of the tribal cultural resources find and the type and nature of the find should not be published beyond providing it to public agencies with jurisdiction or responsibilities related any affected tribal resources. • Following discovery, the applicant or owner shall immediately contact all Native American tribes that have informed the City of Los Angeles they are traditionally and culturally affiliated with the geographic area pf the Project, as well as the Department of City Planning, Office of Historical Resources (OHR). • The applicant or owner shall provide any affected tribe a reasonable period of time, not less than five business days, to conduct a site visit and make recommendations to the applicant or owner regarding the monitoring of future ground disturbance activities and the treatment and disposition of any discovered tribal cultural resources. • The applicant or owner shall implement the tribe's recommendations if the Qualified Tribal Monitor or Archeological Monitor reasonably concludes such recommendations are reasonable and feasible and determined to be supported with substantial evidence. • Consistent with Public Resources Code 21083.2, the handling, treatment, preservation, and recordation of tribal cultural resources shall occur as follows: • The find shall be preserved in place or left in an undisturbed state unless the Project would damage the resource. • When preserving in place or leaving in an undisturbed state is not possible, excavation and recovery of the find for scientific study shall occur unless testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, and this determination is documented by a Qualified Tribal Monitor or Archeological Monitor. • All collected artifacts and fieldwork notes, if not human remains or other mortuary objects, shall be curated at the Natural History			

Mitigation Measure	Monitoring Phase and Monitoring Actions[1]	Implementing Party	Enforcement and Monitoring Entity
Museum of Los Angeles County or another appropriate curator facility. • If cleared by the Qualified Tribal Monitor or Archeological Monitor, Ground Disturbance Activities may continue unimpeded on other portions of the site. Ground Disturbance Activities in the area where the resource(s) were found may commence once the identified resources are properly assessed and processed.			
Impact – Utilities and Services			
A Water Supply Assessment (WSA), prepared by a qualified water expert to meet the requirements herein, shall be required and furnished to the City for inclusion in any environmental documentation for certain developments (as defined in Water Code 10912[a]) in the Project Area subject to California Environmental Quality Act. Under SB 221, approval by the City of certain residential subdivisions should require an affirmative written verification of sufficient water supplies. The WSA must identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' actual water deliveries received by the public water system. The WSA must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions.	Prior to issuance of grading or building permits, submittal of a WSA resolution approved by the Los Angeles Board of Water and Power Commissioners for the individual project(s).	Applicant for individual project and Los Angeles Department of Water and Power	City of Los Angeles, Department of Building and Safety

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5.0 PREPARERS OF THE FINAL EIR

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