4. 2016-2040 RTP/SCS PROGRAM EIR MITIGATION MEASURES

Incorporation of Applicable Mitigation Measures from the 2016-2040 RTP/SCS Program EIR

Public Resources Code (PRC) Section 21151.2 requires that a Transit Priority Project (TPP) also incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIR's, including the 2016-2040 RTP/SCS Program EIR for SCAG on December 2015.

The Mitigation Monitoring and Reporting Program for the 2016-2040 RTP/SCS Program EIR (SCAG MMRP) does not include project-level mitigation measures that are required of the Project. The SCAG MMRP does provide a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the lead agency has identified that a project has the potential for significant effects.

To comply with PRC Section 21151.2, the City has reviewed all mitigation measures contained in the SCAG MMRP (shown on Table 4-1) and determined their applicability to the Project. For each such mitigation measure, the City considered whether to use the SCAG MMRP mitigation measure or an equally effective City mitigation measure or federal, state, regional, or City regulation. The City's applicability determination is found on Table 4-1. As indicated on Table 4-1, with the exception of SCAG mitigation measure MM-LU-1(b), the City has incorporated an equally or more effective City mitigation measure or federal, state, regional, or City regulation or has for other reasons determined that incorporation of the SCAG 2016-2040 RTP/SCS MMRP mitigations measures is not required.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
Aesthetics *Scenic Vista*	Project-Level Mitigation Measure **MM-AES-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. • Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. • Use alternating facades to "break up" large facades and provide visual interest. • Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. • Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. • Retain or replace trees bordering highways, so that clear-cutting is not evident.	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, for informational purposes only, the analysis of scenic impacts provided in Appendix D of this SCEA also demonstrated that there would be no impacts to scenic vistas. The Project includes development of two sites in Downtown Los Angeles. Site 1 development includes 222,574 square feet of mixed residential (382 dwelling units), philanthropic institution, and commercial land uses in two towers (Tower 1A and Tower 1B) and one level of subterranean parking garage with 32 vehicle parking spaces. Site 2 development includes 164,875 square feet of mixed-use residential (303 dwelling units) and commercial land uses in two buildings (Building 1 and Building 2) and 212 vehicle parking spaces in a parking garage. Extensive public bus and rail transit service is provided within the area of the Project Sites that provide regular service intervals of 15 minutes or less near the sites during the peak hours. Public bus transit service in the immediate Project study area is currently provided by Metro, City of Gardena Transit, and City of Montebello Bus Lines. Additional public bus transit service in the Downtown Los Angeles area is provided by Foothill Transit, LADOT DASH Transit Service, Orange County Transportation Authority, and Torrance Transit Service. The Metro Red and Gold lines also are provided in proximity to the Project Sites. The Project Sites are located 0.7 miles southeast of Metro's Purple/Red line station at Pershing Square and 0.8 miles southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction.. Thus, the Project Sites are located in a transit priority area as defined in PRC

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	• Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. • Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions in design of projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.	Section 21099. Further, the Project Sites are located in an urban area and served multiple local bus lines. As such, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099.
Aesthetics *Visual Character/Quality*	Project-Level Mitigation Measure **MM-AES-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, for informational purposes only, the analysis of this topic in Appendix D of this SCEA demonstrates that the Project's impacts related to visual character would be less than significant.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. • Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. • Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. • Design projects consistent with design guidelines of applicable general plans. • Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable. • Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.	
Aesthetics *Light/Glare/Shade*	Project-Level Mitigation Measure **MM-AES-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	has identified mitigation measures capable of avoiding or minimizing the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. • Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations. • Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. • Use unidirectional lighting to avoid light trespass onto adjacent properties. • Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. • Provide structural and/or vegetative screening from light-sensitive uses. • Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses.	residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	• Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. • Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	
Agriculture and Forestry *Conversion of Farmland to Non-Ag Use, Conversion of Forest Land*	Project-Level Mitigation Measure **MM-AF-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses that are within the jurisdiction and responsibility of the Natural Resources Conservation Service, the California Resources Agency, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Farmland Protection Act and implementing regulations, and the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the Farmland Mapping and Monitoring Program of the California Resources Agency. Such measures may include the following, or other comparable measures identified by the Lead Agency taking into account project and site-specific considerations as applicable and feasible: • For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act).	This mitigation measure is not incorporated, because no farmland or agricultural activity exists on or in the vicinity of the Project Sites and no impacts related to this issue would occur.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	• Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. • Maintain and expand agricultural land protections such as urban growth boundaries. Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks. Local governments would be responsible for encouraging the development of agriculture conservation easements or farmland mitigation banks, purchasing conservation agreements or farmland for mitigation, and ensuring that the terms of the conservation easement agreements are upheld. The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see https://www.wildlife.ca.gov/Conservation/Planning/Banking) "A conservation or mitigation bank is privately or publicly owned land managed for its natural resource values. In exchange for permanently protecting, managing, and monitoring the land, the bank sponsor is allowed to sell or transfer habitat credits to permitees who need to satisfy legal requirements and compensate for the environmental impacts of developmental projects. A privately owned conservation or mitigation bank is a free-market enterprise that: • Offers landowners economic incentives to protect natural resources;	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	• Saves permitees time and money by providing them with the certainty of pre-approved compensation lands; • Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values; • Provides for long-term protection and management of habitat. A publicly owned conservation or mitigation bank: • Offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance." In 2013, the University of California published an article entitled "Reforms could boost conservation banking by landowners" that speaks specifically to the use of agricultural lands for in conjunction with conservation banking programs. • Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc., that enhance the commercial viability of retained agricultural lands. • Include underpasses and overpasses at reasonable intervals to maintain property access. • Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland. • Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	viability of agricultural activities, as well as policies that provide compensation for property owners if preservation is not feasible. • Contact the California Department of Conservation and each county's Agricultural Commissioner's office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts.	
Agriculture and Forestry *Zoning for Ag Use, Williamson Act Contract*	Project-Level Mitigation Measure **MM-AF-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from conflict with existing zoning for agricultural use or a Williamson Act contract that are within the jurisdiction and responsibility of the California Department of Conservation, other public agencies, and Lead Agencies. Where the Lead Agency has identified that a project has potential for significant effects, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of agriculture and forestry resources to ensure compliance with the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the California Land Conservation Act of 1965, the Farmland Security Zone Act, and county and city zoning codes, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency,	This mitigation measure is not incorporated, because the Project Sites are not zoned for agricultural production, there is no farmland at the Project Sites, and there are no Williamson Act Contracts in effect for the Project Sites, and no impacts related to this issue would occur.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	taking into account project and site-specific considerations as applicable and feasible: • Project relocation or corridor realignment to avoid lands in Williamson Act contracts. • Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection. • Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable.	
Air Quality *Potential to Violate AQ Standard*	Project-Level Mitigation Measure **MM-AIR-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible. CARB, South Coast AQMD, Antelope Valley AQMD, Imperial County APCD, Mojave Desert AQMD, Ventura County APCD, and Caltrans have	This mitigation measure is not incorporated, because the City has determined that the existing regulatory measures listed below would apply to the Project and are equal to or more effective than SCAG RTP/SCS Program EIR MM-AIR-2(b). Specifically, the applicable regulatory requirements are those identified by CARB and air district(s) and other agencies to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible, are set forth below. • The Project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403: o All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	identified project-level feasible measures to reduce construction emissions: • Minimize land disturbance. • Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. • Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. • Cover trucks when hauling dirt. • Stabilize the surface of dirt piles if not removed immediately. • Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. • Minimize unnecessary vehicular and machinery activities. • Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. • On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. • Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. • Ensure that all construction equipment is properly tuned and maintained.	○ The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind. ○ All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust. ○ All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust. ○ All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust. ○ General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. ○ Trucks having no current hauling activity shall not idle but be turned off. • The Project shall comply with South Coast Air Quality Management District Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which sets requirements to control the emission of VOC from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition. • The Project shall comply with South Coast Air Quality Management District Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, which specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	• Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. • Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators. • Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through- traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. • As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. • Implement EPA's National Clean Diesel Program. • Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options:	• In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. • In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards. • The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings. • The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138. • New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	electric equipment whenever feasible, gasoline-powered equipment if electric infeasible. • On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity. • If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines. • Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines • Convert part of the construction truck fleet to natural gas. • Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts • Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road) • Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas • Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner offroad heavy-duty diesel engines and comply with State off-road regulation • Use on-road, heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation • Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary • Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3 minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit. • Prohibit diesel idling within 1,000 feet of sensitive receptors. • Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors. • The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • The engine size of construction equipment shall be the minimum practical size. • Catalytic converters shall be installed on gasoline-powered equipment. • Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit. • Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite. • Use new or rebuilt equipment.	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	• Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be check by an ASE-certified mechanic and determined to be running in proper condition before it is operated. • Use low rolling resistance tires on long haul class 8 tractor-trailers. • Suspend all construction activities that generate air pollutant emissions during air alerts. • Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.	
Air Quality *Expose Sensitive Receptors to Pollutants*	Project-Level Mitigation Measure **MM-AIR-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS transportation projects would be located. Where the Lead Agency has identified that a project has the potential to expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s), or other comparable measures, to reduce cancer risk pursuant to the Air Toxics "Hot Spots" Act of 1987 (AB2588), as applicable and feasible. Such measures include those adopted by CARB designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment. CARB's strategy includes the following elements: • Set technology forcing new engine standards. • Reduce emissions from the in-use fleet. • Require clean fuels, and reduce petroleum	This mitigation measure is not incorporated, because the Project impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant, and no mitigation measures are required.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	dependency. • Work with US EPA to reduce emissions from federal and state sources. • Pursue long-term advanced technology measures Proposed new transportation-related SIP measures include: On-Road Sources • Improvements and Enhancements to California's Smog Check Program • Expanded Passenger Vehicle Retirement • Modifications to Reformulated Gasoline Program • Cleaner In-Use Heavy-Duty Trucks • Ship Auxiliary Engine Cold Ironing and Other Clean Technology Cleaner Ship Main Engines and Fuel • Port Truck Modernization • Accelerated Introduction of Cleaner Line-Haul Locomotives • Clean Up Existing Commercial Harbor Craft • Limited idling of diesel-powered trucks • Consolidated truck trips and improve traffic flow • Late model engines, Low emission diesel products, engine retrofit technology • Alternative fuels for on-road vehicles Off-Road Sources • Cleaner Construction and Other Equipment • Cleaner In-Use Off-Road Equipment • Agricultural Equipment Fleet Modernization • New Emission Standards for Recreational Boats • Off-Road Recreational Vehicle Expanded	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	Emission Standards	
Biological Resources *Adverse Effect on Candidate, Sensitive, or Special Status Species, Adverse Effect on Riparian Habitat or Other Sensitive Natural Community, Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Bio Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	Project-Level Mitigation Measure **MM-BIO-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on threatened and endangered species and other special status species that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), California Department of Fish and Wildlife (CDFW), other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Sections 7, 9, and 10(a) of the federal Endangered Species Act; the California Endangered Species Act; the Native Plant Protection Act; the State Fish and Game Code; and the Desert Native Plant Act; and related applicable implementing regulations, as applicable and feasible. Additional compliance should adhere to applicable implementing regulations from the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and/or the California Department of Fish and Wildlife. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. • Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of	This mitigation measure is not incorporated, because of the following reasons: • Project impacts related to adverse affecting, either directly or through habitat modifications, any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, would be less than significant. • The Project Sites do not contain any critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. • The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. Thus, none of the mitigation measures that pertain to compliance with Sections 7, 9, and 10(a) of the Federal Endangered Species Act; the California Endangered Species Act; the Native Plant Protection Act; the State Fish and Game Code; and the Desert Native Plant Act; and related applicable implementing regulations, are applicable to the Project. Additionally, the City has determined that the existing regulatory requirements listed below would apply to the Project and are equal to or more effective than SCAG RTP/SCS Program EIR MM-BIO-12(b). Specifically, the Project Applicant would be required to comply with the Migratory

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	the federal Endangered Species Act or Section 2081 of the California Endangered Species Act to support issuance of an Incidental take permit. A wide variety of conservation strategies have been successfully used in the SCAG region to protect the survival and recovery in the wild of federally and state-listed endangered species including the bald eagle: o Avoidance strategies o Contribution of in-lieu fees o Use of mitigation bank credits o Funding of research and recovery efforts o Habitat restoration o Conservation easements o Permanent dedication of habitat o Other comparable measures • Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. • Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources. • Appoint an Environmental Inspector to monitor implementation of mitigation measures. • Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. • Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance.	Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds associated with tree removal would not occur. Compliance with these existing regulations would ensure impacts related to nesting birds would be less than significant.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	• Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	
Biological Resources *Adverse Effect on Riparian Habitat or Other Sensitive Natural Community, Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Bio Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	Project-Level Mitigation Measure **MM-BIO-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on state-designated sensitive habitats, including riparian habitats, that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 1600 of the State Fish and Game Code, USFS Land Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino, implementing regulations for the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other related federal, state, and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats	This mitigation measure is not incorporated, because the Project Sites do not contain any wetlands, riparian habitats, sensitive natural community or critical habitat or support any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service, and no impacts related to this issue would occur. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a food services building; Site 2 is developed with a surface parking lot.

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Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act. • Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. • Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California Endangered Species Act, or Fully-Protected Species afforded protection pursuant to the State Fish and Game Code. • Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds. • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season. • Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities. • Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the *Manual of California Vegetation,* the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate. • Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. • Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats. • Install fencing and/or mark sensitive habitat to be avoided during construction activities. • Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native vegetation to all areas of temporary disturbance within the project area. • Revegetate with appropriate native vegetation following the completion of construction activities. • Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	• Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
Biological Resources *Adverse Effect on Wetlands, Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Bio Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	Project-Level Mitigation Measure **MM-BIO-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 404 of the Clean Water Act and regulations of the U.S. Army Corps of Engineers (USACOE), and other applicable federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible. • Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality	This mitigation measure is not incorporated, because the Project Sites are not located on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. Moreover, the Project Sites are infill sites in an urban setting in a region that is fully developed and would not affect species movement or policies or regulations protecting biological resources. Therefore, no impacts related to this issue would occur.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	Control Boards (RWQCB). Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the Project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: o Permitee-responsible mitigation o Contribution of in-lieu fees o Use of mitigation bank credits • Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether wetlands will be affected and,	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	if necessary, perform a formal wetland delineation.	
Biological Resources *Interfere with the Movement of Species, Conflict with Local Policies or Ordinances Protecting Bio Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	Project-Level Mitigation Measure **MM-BIO-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations of the USFWS, USFS, CDFW, and related regulations, goals and polices of counties and cities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur. • Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.	This mitigation measure is not incorporated, because the City has determined that the existing regulatory compliance requirements listed below would apply to the Project and are equal to or more effective than SCAG RTP/SCS Program EIR MM- BIO-4(b). The applicable regulatory requirements include the MBTA (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure that any potential impacts would be less than significant. Additionally, the Project does not include removal of any City-designated protected trees. For the proposed removal of the 20-non-protected trees (including 6 street trees); however, the Project Applicant would be required to plant replacement trees at a minimum of a one-to-one ratio on or adjacent to the Project Sites in conformance with the City's Urban Forestry Division requirements for Project landscaping and street tree replacement and planting. For street trees that would be removed, the Project Applicant would be required to plant replacement street trees at a two-to-one ratio in accordance with the requirements of the City's Urban Forestry division. Finally, the City does not have any adopted Habitat Conservation Plans.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	• Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement. • Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. • Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible. • Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area from February 1 through August 31. • Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors. • Ensure that suitable nesting sites for migratory nongame native bird species protected under the	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. • Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Analyze habitat linkages/wildlife movement corridors on a broader and cumulative impact analysis scale to avoid adverse impacts from linear projects that have potential for impacts on a broader scale or critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. Require review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDB by a qualified biologist to determine the risk of habitat fragmentation. • Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). • Demonstrate that Projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible. • Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern. • Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. • Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas. • Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in **MM-BIO-1(b)**, where applicable: o Wildlife movement buffer zones o Corridor realignment o Appropriately spaced breaks in center barriers o Stream rerouting o Culverts o Creation of artificial movement corridors such as freeway under- or overpasses o Other comparable measures • Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. • Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species. • Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas.	
Biological Resources *Conflict with Local Policies or Ordinances Protecting Bio Resources, Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	Project-Level Mitigation Measure **MM-BIO-5(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should	This mitigation measure is not incorporated, because the City has determined that compliance by the Project with existing City regulatory requirements that are equal to or more effective than SCAG RTP/SCS Program EIR MM-BIO-5(b). A total of 20 trees are located on Site 1 and Site 2 (including 6 street trees). These trees include the following: • 7 Indian Laurel Fig (*Ficus nitida*) • 6 Tipu Tree (*Tipuanan tipu*) • 7 Apricot Tree (*Prunus armeniaca*) • 3 Weeping Fig (*Ficus benjamina*) • 1 Tree of Heavan (*Ailanthus altissima*)

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	consider mitigation measures to comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. • Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist. • If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species. • Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. • Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting,	• 3 Canary Island Pine (*Pinus canariensis*) • 9 Redbud Tree (*Cercis Canadensis*) • 10 Australian Tea Tree (*Leptospermum laevigatum*) • 1 Crape Myrtle (*Lagerstroemia indica*) None of these trees are protected species as defined above (refer to the Tree Reports in Appendix E). The 20 trees (including the 6 street trees) associated with Site 1 and Site 2 would be removed during construction of the Project. Also, it is possible that all 27 trees in the courtyard (the site of the proposed transformer relocation) would be removed, although it is anticipated that fewer trees would be removed. However, for those trees removed from the Project Sites, the Project Applicant would be required to plant replacement trees at a minimum of a one-to-one ratio on or adjacent to the Project Sites in conformance with the City's Urban Forestry Division requirements for Project landscaping and street tree replacement and planting. For street trees that would be removed, the Project Applicant would be required to plant replacement street trees at a two-to-one ratio in accordance with the requirements of the City's Urban Forestry Division. Prior to the removal of trees located within the public right-of-way, the Project Applicant would be required to obtain approval from the Board of Public Works for the removal and replacement of said trees. Street trees would be required to be removed and replaced as required by the Urban Forestry Division and the Board of Public Works. The landscape plans for the Project shall identify the all trees that would be removed. Compliance with the City's requirements would ensure no significant impacts related to biological resources, in particular trees, would occur.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. • Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. • Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration. • If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. • Remove all debris created as a result of any tree removal work from the property within two	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. • Design projects to avoid conflicts with local policies and ordinances protecting biological resources. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: o Avoidance strategies o Contribution of in-lieu fees o Planting of replacement trees at a minimum ratio of 2:1 o Re-landscaping areas with native vegetation post-construction o Other comparable measures	
Biological Resources *Conflict with Habitat Conservation Plan, Natural Community Conservation Plan, or Other Conservation Plan*	Project-Level Mitigation Measure **MM-BIO-6(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on HCP and NCCPs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act; and implementing regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead	This mitigation measure is not incorporated, because the City has no adopted Habitat Conservation Plans or Natural Community Conservation Plans. As such, no impacts related to this issue would occur.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	Agency: • Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs. • Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in **MM-BIO-1(b)**, where applicable.	
Cultural Resources *Potential to Destroy Unique Paleo Resources or Unique Geological Features*	Project-Level Mitigation Measure **MM-CUL-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation	This mitigation measure is not incorporated, because the City has determined that the following mitigation measure is imposed as being equal to or more effective than the SCAG RTP/SCS Program EIR MM-CUL-1(b): CUL-MM-3: Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying paleontological or unique geologic resources or sites from the Project Sites. In addition, in the event that paleontological resources or sites, or unique geologic features are

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. • Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources. • Where avoidance of parent material with a moderate to high potential to yield unique paleontological resources is not feasible: o All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.	exposed during Project construction, Los Angeles Department of Building and Safety will be notified immediately, and work within 50 feet of the find shall stop until a qualified paleontologist, can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Sites. Recommendations could include a preparation of a Treatment Plan, which could require recordation, collection, and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any paleontological resources or sites, or unique geologic features shall be treated in accordance with state law.

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	○ Prepare a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of representative samples of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during excavation or blasting, use a qualified paleontologist to oversee the implementation of the PRMP. ○ Monitor blasting and earth-moving activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontologist or archeologists cross-trained in paleontology to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. ○ Identify where excavation and earthmoving activity is proposed in a geologic unit having a moderate or high potential for containing fossils and specify the need for a paleontological or archeological (cross-trained in paleontology) to be present during earth-moving activities or blasting in these areas. • Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance. • Salvage and document adversely affected	

Table 4-1
Applicability of Project-Level Mitigation Measures from the 2016-2040 RTP/SCS

Topic	Measure	Applicability to the Project
	resources sufficient to support ongoing scientific research and education.	
Cultural Resources *Substantial Adverse Change in Significance of a Historical Resource, Substantial Adverse Change in the Significance of an Archaeological Resource*	Project-Level Mitigation Measure **MM-CUL-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on historical resources, to ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans and other federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified. • Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will	This mitigation measure is not incorporated, because the City has determined, based on historic resource memoranda for the Project dated May 25, 2018 and as revised on August 3, 2018 (refer to Appendix G) prepared by a qualified historian meeting the Secretary of the Interior's Professional Qualification Standards that the Project would not result in any significant impacts related to historical resources. *Archaeological Resources* This mitigation measure is not incorporated, because the City has determined that the following mitigation measures are imposed as being equal to or more effective than the SCAG RTP/SCS Program EIR MM-CUL-2(b): CUL-MM-1: Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project Sites. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Sites. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the

Table 4-1
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Topic	Measure	Applicability to the Project
	make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project. • Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: o Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. o Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. • Secure a qualified environmental agency and/or	discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law. CUL-MM-2 Before ground disturbance, field observations regarding the geo-archaeological setting shall be conducted by a qualified archaeologist to determine the presence of undisturbed sediments capable of preserving archaeological remains, and the depth at which these sediments would no longer be capable of containing archaeological material. An archaeological monitor shall be present during initial excavation activities. The duration and timing of the monitoring shall be determined by the qualified archaeologist in consultation with the Department of City Planning and the Project Applicant. The qualified archaeologist may designate an archaeologist to conduct the monitoring under their direction.

Table 4-1
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Topic	Measure	Applicability to the Project
	architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource. • Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site. • Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified. • Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. • If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. • Conduct construction activities and excavation to avoid cultural resources (if identified). If	

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Topic	Measure	Applicability to the Project
	avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated. • Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources.	
Cultural Resources *Disturb Human Remains*	Project-Level Mitigation Measure **MM-CUL-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency should consider mitigation measures capable of avoiding or reducing significant impacts on human remains, to ensure compliance with the California Health and Safety Code, Section 7060 and Section 18950-18961 and Native American Heritage Commission, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any	This mitigation measure is not incorporated, because the City has determined that the existing regulatory requirements listed below regarding discovery of human remains would apply to the Project and are equal to or more effective than the SCAG RTP/SCS Program EIR MM-CUL-4(b). Specifically, in accordance with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project site, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner

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Topic	Measure	Applicability to the Project
	location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. • If any discovered remains are of Native American origin: o Contact the County Coroner to contact the Native American Heritage Commission to ascertain the proper descendants from the deceased individual. The coroner should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. o If the Native American Heritage Commission is unable to identify a descendant, or the descendant failed to make a recommendation within 24 hours after being notified by the commission, obtain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave	shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Through compliance with this regulation, potential Project impacts to human remains would be less than significant.

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	goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance where the following conditions occur: ▪ The Native American Heritage Commission is unable to identify a descendent; ▪ The descendant identified fails to make a recommendation; or ▪ The landowner or their authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.	
Energy *Increase Residential Energy Use, Increase Building Energy Use*	Project-Level Mitigation Measure **MM-EN-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with CALGreen, local building codes, and other applicable laws and regulations governing residential building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency:	This mitigation measure is not incorporated, because the City has determined the Project substantially conforms to this mitigation measure through the Project's project design features and compliance with existing City regulatory requirements. The Project would be constructed to meet or exceed energy standards outlined in the City's Green Building Code, which incorporates the requirements of CALGreen.

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Topic	Measure	Applicability to the Project
	• Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including: o Use energy efficient materials in building design, construction, rehabilitation, and retrofit. o Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. o Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight. o Incorporate passive environmental control systems that account for the characteristics of the natural environment. o Use high-efficiency lighting and cooking devices. o Incorporate passive solar design. o Use high-reflectivity building materials and multiple glazing. o Prohibit gas-powered landscape maintenance equipment. o Install electric vehicle charging stations. o Reduce wood burning stoves or fireplaces. o Provide bike lanes accessibility and parking at residential developments.	
Geology and Soils *Adverse Effects due to Earthquake or Other Seismic Activity, Unstable*	Project-Level Mitigation Measure **MM-GEO-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG	This mitigation measure is not incorporated, because the City has determined that the existing regulatory requirements listed below regarding soils and geology would apply to the Project

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Topic	Measure	Applicability to the Project
Geologic Unit or Soil, Expansive Soil	has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault. • Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the Alquist-Priolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace	and are equal to or more effective than the SCAG RTP/SCS Program EIR MM-GEO-1(b). Specifically, the Project would be required to comply with the existing building regulations associated with the City's Building Code, which incorporates the Uniform Building Code and the California Building Code. Furthermore, construction of the Project would not exacerbate existing physical conditions pertaining to seismic hazards. Moreover, the Project is subject to regulatory compliance measures, which avoid and/or reduce the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides. The Project Sites would also be submitted to the following regulatory compliance measures: (1) Prior to the issuance of any permit, a geology/soils report shall be submitted to the Grading Division to provide design recommendations for the proposed grading/construction along with an evaluation by the project geologist to confirm that the proposed habitable structures are located within the shadow zone of the fault study exploration. (2) The report shall be reviewed and approved by the Los Angeles Department of Building and Safety, Grading Division for the Project (3) During construction, the project engineering geologist shall observe all excavations that expose the natural alluvial soils and bedrock to verify the conclusions of the fault investigation, and confirm that no Holocene faults or ground deformation are exposed. The project engineering geologist shall post a notice on the job site for the

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Topic	Measure	Applicability to the Project
	the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC. • Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures	City Inspector and the Contractor stating that the excavation (or portion thereof) has been observed, documented and meets the conditions of the report. No fill or lagging shall be placed until the LADBS Inspector has verified the documentation. (4) A supplemental report that summarizes the geologist's observations shall be submitted to the Grading Division of the Department upon completion of the excavations. If evidence of active faulting is observed, the Grading Division shall be notified immediately.

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	to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.	
Geology and Soils *Soil Erosion or Loss of Topsoil*	Project-Level Mitigation Measure **MM-GEO-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California	This mitigation measure is not incorporated, because the City has determined that the existing regulatory requirements listed below that require compliance with existing quality standards as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) would apply to the Project and are equal to or more effective than the SCAG RTP/SCS Program EIR MM-GEO-4(b). Specifically, the Project would be required to comply with the NPDES General Construction Permit including the preparation of a SWPPP and implementation of best management practices (BMPs), required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations

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Topic	Measure	Applicability to the Project
	Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following: o File a Notice of Intent (NOI) with the SWRCB. o Prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices;	(Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Sites would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements. Also, during operation the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Sites as compared to the current conditions. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not cause soil erosion or the loss of topsoil.

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	a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. o Submit to the RWQCB a copy of the SWPPP and evidence of submittal of the NOI to the SWRCB. Implementation of the SWPPP should start with the commencement of construction and continue through the completion of the project. o After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB. • Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.	
Greenhouse Gases *Cumulative Impacts*	Project-Level Mitigation Measure **MM-GHG-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG	This mitigation measure is not incorporated, because the City has determined that the existing regulatory requirements and project design features listed below, including but not limited

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	has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases**,** the Lead Agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting greenhouse gas mitigation measures that have been used for projects in the SCAG region as set forth below, or through comparable measures identified by Lead Agency: • Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision. • Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. • Off-site measures to mitigate a project's emissions. • Measures that consider incorporation of Best	to the City's Green Building Code are applicable, and are equal to or more effective than the SCAG RTP/SCS Program EIR MM-GHG-3(b) in avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Such features and regulatory requirements include the following: • The Project must meet Title 24 2016 standards and include ENERGY STAR appliances. Energy Star-rated appliances would reduce the projects energy demand during the operational life of the 685 dwelling units. • The Project is subject to construction waste reduction of at least 50 percent. In addition, operations at the Project Sites are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. • As mandated by the LA Green Building Code, the Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. • The Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use of renewable energy. • The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use.

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	Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: o Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction; o Use alternative (non-petroleum based) fuels; o Deployment of zero- and/or near zero emission technologies as defined by CARB; o Use lighting systems that are energy efficient, such as LED technology; o Use the minimum feasible amount of GHG-emitting construction materials that is feasible; o Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production; o Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling, and reuse; o Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy; o Incorporate design measures like	• The Project would include a minimum of ten percent of the total number of parking spaces to include Electric Vehicle (EV) Charging Stations. • The Project would be consistent with the following key GHG reduction strategies in SCAG's 2016-2040 RTP/SCS which are based on changing the region's land use and travel patterns: o Compact growth in areas accessible to transit; o More multi-family housing; o Jobs and housing closer to transit; o New housing and job growth focused in High Quality Transit Areas (HQTA); and o Biking and walking infrastructure to improve active transportation options, transit access. Additionally, the Project would incorporate the following project design features, which would further reduce the Project's GHG emissions: • Solar voltaic panes on building roof levels. Approximately 4,500 square feet would be included on Site 1, and approximately 6,000 square feet would be included on Site 2. • Windows would be included in all living units and common spaces for natural daylight, reducing the need for overhead lighting impacting the need for electricity. High-performance dual-pane windows and exterior materials would be used in order to reduce the need for energy driven mechanical systems. • Active energy conservation strategies would include implementing LED lighting with daylighting controls and dimming capabilities, installing motion detector controls for all circulation and auxiliary spaces, providing Energy Star qualified appliances.

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	WaterSense fixtures and water capture to reduce water consumption; o Use lighter-colored pavement where feasible; o Recycle construction debris to maximum extent feasible; o Protect and plant shade trees in or near construction projects where feasible; and o Solicit bids that include concepts listed above. • Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles. • Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network. • Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations. • Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs. • Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and	• Materials selection for the building would be made taking into consideration energy conservation, durability, reduction of air pollutants and recycling. Products would be chosen for their resiliency and durability in order to help offset maintenance costs. Finish materials would have no or low volatile organic (VOC) compounds, in order to help reduce the introduction of harmful chemicals into the building. Materials would be chosen for their pre/post-consumer content to reduce the amount of virgin material being used and reduce amount of waste. • Plants and their substrate would act as a natural water filter reducing the contamination of water that leaves the site. Low-maintenance native and adapted plants would be chosen for landscaped areas and will take into consideration creating create mini-ecosystems with habitats for birds and beneficial insects in order to increase the biodiversity at the site. The landscaped area could reduce the urban heat island effect and smog as the plants act as a natural air filter and absorb heat versus reflecting it. Pervious paving areas may also be used to reduce the amount of hardscape, decrease storm water run-off, and cool the microclimate of the building. • High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less. • Showerheads with a flow rate of 1.5 gallons per minute (gpm) or less. • Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less. • Drip/subsurface irrigation (micro-irrigation) • Micro-spray • Proper hydro-zoning/zoned irrigation (group plants with similar water requirements) • Artificial turf

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Topic	Measure	Applicability to the Project
	unloading for those vehicles. • Land use siting and design measures that reduce GHG emissions, including: o Developing on infill and brownfields sites; o Building high density and mixed use developments near transit; o Retaining on-site mature trees and vegetation, and planting new canopy trees; o Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and o Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.	• Drought-tolerant plants – 50 percent of total landscaping Moreover, the Project is consistent with state, regional, and City of Los Angeles GHG emission reduction goals and objectives, and thus would not conflict with any applicable plan, policy, or regulation of an agency adopted for purposes of reducing the emission of GHGs. And finally, pursuant to California Public Resources Code Sections 21155.2 and 21159.28, a SCEA prepared for a TPP that is consistent with the 2016-2040 RTP/SCS and its applicable mitigation measures does not need to prepare or discuss project specific or cumulative GHG emission impacts associated with car or light-duty truck trips.
Hazards and Hazardous Materials *Significant Hazard due to Routine Transport, Use, or Disposal of Hazardous Materials, Reasonably Foreseeable Upset and Accident Conditions, Hazardous Emissions or Materials Near School*	Project-Level Mitigation Measure **MM-HAZ-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Hazardous Waste Control Act, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, the Hazardous Waste Source Reduction and Management Review Act of 1989, the California Vehicle Code, and other applicable laws and	This mitigation measure is not incorporated, because the City has determined that a Phase I ESA and a Phase II ESA have been prepared for the Project that did not identify any recognized environmental concerns (RECs) and that in the event that an underground storage tank is encountered during excavation of Site 1, the City's mitigation measures listed below would apply to the Project and are equal to or more effective than the SCAG RTP/SCS Program EIR MM-HAZ - 1(b). Specifically, the following mitigation measure has been imposed on the Project that would ensure any potential impacts related to an unknown underground storage tank would be less than significant: HAZ-MM-1: During excavation of Site 1 for the subterranean parking garage and prior to

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	regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. • Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. • Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials. • Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project. • Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan	issuance of a Building Permit, if a UST is encountered, the Project Applicant shall procure a Division 5 Permit from the Los Angeles Fire Department for removal of a UST and shall comply with the requirements of the permit.

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	should include the following: o The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. o The location of such hazardous materials. o An emergency response plan including employee training information. o A plan that describes the manner in which these materials are handled, transported and disposed. • Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects. • Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. • Avoid overtopping construction equipment fuel gas tanks. • During routine maintenance of construction equipment, properly contain and remove grease and oils. • Properly dispose of discarded containers of fuels and other chemicals.	
Hazards and Hazardous Materials *Located on a Hazardous Materials Site Section 65962.5*	Project-Level Mitigation Measure **MM-HAZ-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to	This mitigation measure is not incorporated, because the City has determined that the Project Sites are not included on any list compiled pursuant to Government Code Section 65962.5, and no impacts related to this issue would occur.

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	a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and Clean-up Act, and the Uniform Building Code, and County and City building standards, and all applicable federal, state, and local laws and regulations governing hazardous waste sites, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. • Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer.	

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	• Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. • Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. • Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. • Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. • Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. • Cease work if soil, groundwater, or other environmental medium with suspected	

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Topic	Measure	Applicability to the Project
	contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. • Use best management practices (BMPs) regarding potential soil and groundwater hazards. • Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. • Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. • Prior to issuance of any demolition, grading, or	

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Topic	Measure	Applicability to the Project
	building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. • Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. • If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations. • Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. • Where the remediation of lead-based paint has been determined to be required, provide	

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Topic	Measure	Applicability to the Project
	specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. • Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
Hazards and Hazardous Materials *Wildland Fire Risk*	Project-Level Mitigation Measure **MM-HAZ-8(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands; that are in the jurisdiction and	This mitigation measure is not incorporated, because the Project Sites are located in a fully urbanized area and there are no wildlands in the vicinity. Furthermore, the Project is subject to existing regulatory requirements, such as adherence to Fire Code requirements. Thus, no impacts related to these issues would occur.

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Topic	Measure	Applicability to the Project
	responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with local general plans, specific plans, and regulations provided by County and City fire departments, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures would be applied to eaves, vents, windows, and doors to avoid any gaps that would allow intrusion by flame or embers. • Adhere to the Multi-Jurisdictional Hazards Mitigation Plan, as well as local general plans, including policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training, sustainable development, brush management, and public outreach. • Encourage the use of fire-resistant vegetation native to Southern California and/or to the local microclimate (e.g., vegetation that has high moisture content, low growth habits, ignition-resistant foliage, or evergreen growth), eliminate brush and chaparral, and discourage the use of fire-promoting species especially non-native, invasive species (e.g., pampas grass, fennel, mustard, or the giant reed) in the immediate vicinity of development in areas with high fire	

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Topic	Measure	Applicability to the Project
	threat. • Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of non-native, invasive species to promote healthy, natural ecosystem regrowth. Native vegetation is more likely to have deep root systems that prevent slope failure and erosion of burned areas than shallow-rooted non-natives. • Submit a fire safety plan (including phasing) to the Lead Agency and local fire agency for their review and approval. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase. • Utilize Fire-wise Land Management by encouraging the use of fire-resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat. • Promote Fire Management Planning that would help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts. • Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat.	
Hydrology and Water Quality *Violate Water Quality Standards or Waste Discharge Requirements, Alteration of Site Drainage Pattern, Runoff Exceeding Stormwater Drainage System*	Project-Level Mitigation Measure **MM-HYD-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that	This mitigation measure is not incorporated, because the City has determined that the existing regulatory requirements listed below as governed by the LARWQCB and the City regarding water quality would apply to the Project and are equal to or more effective than the SCAG RTP/SCS Program EIR MM-HYD-1(b).

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Topic	Measure	Applicability to the Project
Capacity, Otherwise Degrade Water Quality	are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all applicable laws, regulations, and health and safety standards set forth by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements in a manner that conforms to applicable water quality standards and/or waste discharge requirements, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. • Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. • Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. • Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. • Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. • Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for	Specifically, the Project would be required to comply with the NPDES General Construction Permit including the preparation of a SWPPP and implementation of BMPs, required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Sites would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements. Also, during operation the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Sites as compared to the current conditions. Compliance with the LID Plan and SUSMP, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

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Topic	Measure	Applicability to the Project
	construction within the vicinity of a watercourse: o U.S. Army Corps of Engineers (Corps): Section 404. Permit approval from the Corps should be obtained for the placement of dredge or fill material in Waters of the U.S., if any, within the interior of the project site, pursuant to Section 404 of the federal Clean Water Act. o Regional Walter Quality Control Board (RWQCB): Section 401 Water Quality Certification. Certification that the project will not violate state water quality standards is required before the Corps can issue a 404 permit, above. o California Department of Fish and Wildlife (CDFW): Section 1602 Lake and Streambed Alteration Agreement. Work that will alter the bed or bank of a stream requires authorization from CDFW. • Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. • Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. • Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies. • Provide operational best management practices	

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Topic	Measure	Applicability to the Project
	for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. • Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. • Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. • Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters. • Provide culverts and facilities that do not increase	

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Topic	Measure	Applicability to the Project
	the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel. • Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. • Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible. • If a Project has the potential to create a major new stormwater discharge to a water body with an established Total Maximum Daily Load (TMDL), a quantitative analysis of the anticipated pollutant loads in the stormwater discharges to the receiving waters should be carried out.	
Hydrology and Water Quality *Deplete Groundwater Supply or Interfere with Groundwater Recharge*	Project-Level Mitigation Measure **MM-HYD-2(b):** Consistent with the provisions of the Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the	This mitigation measure is not incorporated, because the Project site area is not a source of groundwater recharge. The Project site is already completely impervious and would continue in this condition after the Project is developed. Groundwater beneath the Project site is perched groundwater and is of poor quality. Only a small percentage of the City's water supply, which would be used by the Project, comes from groundwater supplies. As such there is no impact related to this issue.

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Topic	Measure	Applicability to the Project
	Lead Agency can and should consider mitigation measures to ensure compliance with applicable laws, regulations, and health and safety standards set forth by federal, state, regional, and local authorities that regulate groundwater management, consistent with the provisions of the Groundwater Management Act and implementing regulations, including recharge in a manner that conforms to federal, state, regional, and local standards for sustainable management of groundwater basins, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. • Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. • Reduce hardscape to the extent feasible to	

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Topic	Measure	Applicability to the Project
	facilitate groundwater recharge as appropriate.	
Hydrology and Water Quality *Structures within a 100-Year Floodplain Hazard Area, Risk due to Levee or Dam Failure, Risks due to Seiche, Tsunami, or Mudflow*	Project-Level Mitigation Measure **MM-HYD-8(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows in a 100-year flood hazard area that are within the jurisdiction and authority of the Flood Control District, County Public Works Departments, local agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all federal, state, and local floodplain regulations, consistent with the provisions of the National Flood Insurance Program, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program. • Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains	This mitigation measure is not incorporated, because the Project Sites are not, according to the Federal Emergency Management Agency (FEMA) flood insurance rate map, located within a designated flood zone. Also, the Project Sites are not located within an area potentially affected by seiche, tsunami, or mudflow. The Project Sites are not located within a designated 100-year flood plain. The Project Sites are identified in the Safety Element of the General Plan as being located in any area potentially susceptible to floods associated with a levee or dam. However, the result of the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing facilities. None of the 13 dams in the greater Los Angeles area was severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake. The LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD). DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures in order to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at

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	and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	seepage drains, and performing a thorough visual inspection. Many LADWP reservoirs have Movement and Settlement (M&S) survey points installed on, and near, the dams. These points are periodically measured using precision survey equipment. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. LADWP conducts surveillance of the reservoirs as required by DSOD. Thus, the Hollywood Reservoir and Mulholland Dam, as with other dams in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the sites. As such, the minimal risk of flooding from potential dam or levee failure would not be exacerbated by the Project. Therefore, impacts related to flooding would be less than significant.
Land Use and Planning *Conflict with Applicable Land Use Plan, Policy, or Regulation*	Project-Level Mitigation Measure **MM-LU-1(b)**: Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with	Mitigation Measure MM-LU-1(b) is incorporated and identified in Section 6 (Sustainable Communities Environmental Impact Analysis) of this SCEA. The existing land use designation for the Project Sites is Light Manufacturing. The Project Applicant is requesting a General Plan Amendment to amend the land use designation of the sites to Regional Center Commercial to allow for development of the Project. The Project Sites are located within the Central City Community Plan area. More specifically, the sites are located within the Central City East Neighborhood, as described in the text of the plan. While the sites and surrounding areas have a land use designation Light Manufacturing, the area is developed with a mixture of manufacturing, commercial, and existing residential development. As described in the plan text,

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	zoning and ordinance codes, general plans, land use plan, policy, or regulation of an agency with jurisdiction over the project, as applicable and feasible. Such measures may include the following, and/or other comparable measures identified by the Lead Agency: • Where an inconsistency with the adopted general plan is identified at the Project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan.	the area is developed with a number of Single-Room Occupancy (SRO) buildings. While the proposed use is not permitted in the existing land use designation and zone, the use is compatible with the surrounding uses in the area. The requested General Plan Amendment, Zone Change, and Height District Change would permit the development of the sites with affordable housing, social services, and commercial uses that are compatible with the existing built environment. • The City is currently facing a homelessness epidemic, with approximately 60,000 persons in Los Angeles County experiencing homelessness on any given night and the highest density of these individuals is in central Los Angeles, particularly within the area of the Project Sites (i.e., Skid Row). The Project includes development of 685 residential units (and associated supportive services) that would include a combination of restricted affordable units set aside for permanent supportive housing for the homeless and restricted affordable units set aside for seniors and veterans. • The Project would assist the City's efforts to fight homelessness. The City is taking steps to create policy to address the homeless and housing crises. Voters recently approved Measure H and Proposition HHH to implement sales taxes that will help fund homeless services and homeless housing. Measure H aims to do several things to increase services for homeless, including but not limited to development of outreach teams comprised of case workers and health specialists, temporary bridge housing, a rapid rehousing program and the provision of supportive services like job training, substance abuse counseling, and mental health treatment. Proposition HHH will incur a new property tax which will fund the Proposition HHH Permanent Supportive Housing Loan Program which emphasizing reducing homelessness by providing funding to create safe and affordable housing units, and increasing

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		accessibility to a variety of services and treatment programs within these permanent supportive housing projects. Therefore, the City imposes MM-LU-1(b) on the Project to ensure that the Project's potential conflicts related to land use designation for the Project Sites would be less than significant.
Land Use and Planning *Physically Divide a Community*	Project-Level Mitigation Measure **MM-LU-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid the creation of barriers that physically divide such communities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consider alignments within or adjacent to existing public rights-of-way. • Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. • Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular	This mitigation measure is not incorporated, because the Project does not include the development of new roadway facilities and would not physically divide a community. There are no impacts related to this issue.

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	intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). • Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods. • Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: o Alignment shifts to minimize the area affected. o Reduction of the proposed right-of-way take to minimize the overall area of impact. o Provisions for bicycle, pedestrian, and vehicle access across improved roadways. • Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project. • Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities.	
Mineral Resources *Loss of Availability of a Known Mineral Resource*	Project-Level Mitigation Measure **MM-MIN-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site	This mitigation measure is not incorporated, because the Project Sites are not located within the Los Angeles Downtown Oil Field, a Mineral Resource Zone 2 (MRZ-2) Area, an Oil Drilling/Surface Mining Supplemental Use District, or an Oil Field/Drilling Area. None of the suggested measures are applicable as there are no known aggregate and mineral sources or locally important mineral resource recovery sites on or adjacent to the Project Sites. Therefore, there are no impacts

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	delineated on a local general plan, specific plan or other land use plan that are within the jurisdiction and responsibility of the California Department of Conservation, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with SMARA, California Department of Conservation regulations, local general plans, specific plans, and other laws and regulation governing mineral or aggregate resources, as applicable and feasible. Such measures may include the following, other comparable measures identified by the Lead Agency: • Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. • Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures: o Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. o Identify and use building materials, particularly aggregate materials, resulting from demolition at other	related to these issues.

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	construction sites in the SCAG region, or within a reasonable hauling distance of the project site. o Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. o Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of Project Sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	
Noise *Exposure of Persons to Noise in Excess of Local Standards, Excessive Groundborne Vibration or Noise Levels, Substantial Permanent Increase in Noise Level, Substantial Temporary Increase in Noise Levels*	Project-Level Mitigation Measure **MM-NOISE-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure consistency with the Federal Noise Control Act, California Government Code Section 65302, the	This mitigation measure is not incorporated, because the City has determined that the existing mitigation measures and regulatory compliance measures listed below regarding noise will apply to the Project and are equal to or more effective than the SCAG RTP/SCS Program EIR MM-NOISE-1(b): Specifically, the City's noise regulations, including LAMC Section 41.40 and 112.05. Additionally, the City imposes the following mitigation measures on the Project that are comparable and equally effective to MM-NOISE-1(b): NOISE-MM-1: All diesel-powered construction vehicles

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	Governor's Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health and safety standards set forth by federal, state, and local authorities that regulate noise levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Install temporary noise barriers during construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. • Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices. • Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels. • Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction	shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA. NOISE-MM-2: Temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA shall be erected along the Project's boundaries.

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	contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. • Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. • Designate an on-site construction complaint and enforcement manager for the project. • Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used,	

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Topic	Measure	Applicability to the Project
	such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. • Ensure that construction equipment does not idle for an extended time in the vicinity of noise-sensitive receptors. • Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors. • Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive receptors to the maximum extent feasible. • Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way. • Use noise barriers to protect sensitive receptors from excessive noise levels during construction. • Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls. • Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. • Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. • Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve	

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	the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.	
Noise *Exposure of Persons to Excessive Groundborne Vibration or Noise Levels*	Project-Level Mitigation Measure **MM-NOISE-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of vibration impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Federal Transportation Authority and Caltrans guidance documents, county or city transportation commission, noise and vibration ordinances and general plan noise elements for the counties and cities where projects are undertaken and other health and safety regulations set forth by federal state, and local authorities that regulate vibration levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to	This mitigation measure is not incorporated, because the Project would not generate groundborne vibration that would exceed established significance thresholds and as such, would not result in any significant impacts related to groundborne vibration.

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Topic	Measure	Applicability to the Project
	not exceed the thresholds. • For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. • For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the use of more than one pile driver to shorten the total pile driving duration.	
Population and Housing *Displacement of Housing, Requiring Replacement Housing Elsewhere*	Project-Level Implementation Measures **MM-PHE-2(b).** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to displacement that are within the jurisdiction and responsibility of Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to minimize the displacement of existing housing and people and to ensure compliance with local jurisdiction's housing elements of their general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an	This mitigation measure is not incorporated, because the Project would consist of the development of new housing and commercial land uses on a sites that are currently developed with nonresidential uses. No displacement of existing housing would occur with the development of the Project and therefore, none of the suggested measures are applicable.

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Topic	Measure	Applicability to the Project
	iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. • Prioritize the use existing ROWs, wherever feasible. • Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction.	
Public Services *Adverse Impacts Associated with New or Physically Altered Governmental Facilities for Public Protective Fire and Emergency Services*	Project-Level Mitigation Measure **MM-PS-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the performance objectives established in the adopted county and city general plans, to provide sufficient structures and buildings to accommodate fire and emergency response, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:	This mitigation measure is not incorporated, because existing facilities are capable of providing acceptable response times for fire protection and emergency response services. Specifically, the Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance (1.5 miles in this instance). The Project Sites are served by LAFD Station Nos. 4, 9, and 10, approximately 1.3, 0.2, and 1.6 miles (respectively) from the Project Sites. Additionally, the Project would be subject to the existing regulations in the City's Fire Code and LAMC related to emergency access. Thus, fire protection response with existing facilities is therefore considered adequate. Therefore, the Project would not require the need for new or physically altered governmental facilities.

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	• Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements. • During project-level review of government facilities projects, require implementation of Mitigation Measures **MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b),** and **MM-USS-6(b)** to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	
Public Services Facilities *Adverse Impacts Associated with New or Physically Altered Governmental Facilities for Public Protective Security Services*	Project-Level Mitigation Measure **MM-PS-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. Where the Lead	This mitigation measure is not incorporated, because existing facilities are capable of providing acceptable response times for police protection, and the City-imposed mitigation measure discussed below is equally effective in mitigating any potential impacts to a less than significant level. The Project Sites are currently served by the Los Angeles Police Department's (LAPD). The Project would incorporate crime prevention features into the design of the buildings and public spaces, such as lighting of entryways and public areas. The Project would feature the following:

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Topic	Measure	Applicability to the Project
	Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the standards established in the safety elements of county and city general plans to maintain police response performance objectives, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible, including: • Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel. • During project-level review of government facilities projects, require implementation of Mitigation Measures **MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b),** and **MM-USS-6(b)** to avoid or reduce significant environmental impacts associated with the construction or	• On-site security personnel; • Security cameras; • Perimeter lighting to supplement the street lighting and to provide increased visibility and security; • Parking structure access control; and • Residential units access control. As outlined in Mitigation Measure POLICE-MM-1 (listed below), the Project would provide the LAPD with a diagram of each portion of the Project Sites, showing access routes and additional access information as requested by the LAPD, to facilitate police response. Emergency access to the Project Sites would be provided by the existing street system. The Project's direct minimal population increase and associated demand for police services, along with the provision of on-site security features, coordination with LAFD, and incorporation of crime prevention features, would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Thus, with mitigation, Project impacts related to police protection services would be less than significant. Therefore, the Project would not result in the need for new or physically altered facilities for public protective security services. POLICE-MM-1: Prior to issuance of a Certificate of Occupancy, the Project Applicant shall provide the Central Area Commanding Area Officer with diagrams of each portion of the Project Sites. The diagrams shall include access routes and additional information that might facilitate police response.

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Topic	Measure	Applicability to the Project
	expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	
Public Services *Adverse Impacts Associated with New or Physically Altered Governmental Facilities for School Services*	Project-Level Mitigation Measure **MM-PS-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives that are within the jurisdiction and responsibility of school districts and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Community Facilities Act of 1982, the California Education Code, and the goals and policies established within the applicable adopted county and city general plans to ensure that the appropriate school district fees are paid in accordance with state law, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible: • Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.	This mitigation measure is not incorporated, because the City has determined that the existing regulatory requirements listed below would apply to the Project and are equal to or more effective than the SCAG RTP/SCS Program EIR MM-PS-3(b). Specifically, the Project is subject to the following existing regulation that avoids or reduces the significant effects from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives that are within the jurisdiction and responsibility of school districts and local jurisdictions: • The Applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

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Topic	Measure	Applicability to the Project
	• During project-level review of government facilities projects, require implementation of Mitigation Measures **MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b),** and **MM-USS-6(b)** to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	
Recreation *Increased Use or Physical Deterioration of Recreational Facilities*	Project-Level Mitigation Measure **MM-REC-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures capable of avoiding or reducing significant impacts on the use of existing neighborhood and regional parks or other recreational facilities to ensure compliance with county and city general plans and the Quimby Act, as	This mitigation measure is not incorporated, because the Project Applicant would be required to pay park fees for the 9 manager's units in accordance with mandates set forth in Los Angeles Municipal Code Section 17.12 and 12.33.

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Topic	Measure	Applicability to the Project
	applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the Project area, in coordination with local and regional open space planning and/or responsible management agencies. • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: o Increasing the accessibility to natural areas for outdoor recreation. o Promoting infill development and redevelopment to revitalize existing communities. o Utilizing "green" development techniques. o Promoting water-efficient land use and development. o Encouraging multiple uses. o Including trail systems and trail segments in General Plan recreation standards. • Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of	

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Topic	Measure	Applicability to the Project
	protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the HQTA. • Where construction or expansion of recreational facilities is included in the project or required to meet public park service ratios, require implementation of Mitigation Measures **MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b),** and **MM-USS-6(b)** to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	
Transportation/Traffic *Conflict with Measures of Effectiveness For Performance of the Circulation System*	Project-Level Mitigation Measure **MM-TRA-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. This measure need only be considered where it is found by the Lead Agency to be appropriate and	This mitigation measure is not incorporated, because the Project already substantially conforms to this mitigation measure, due to the Project's mixed-use nature and transit adjacency avoid or reduce the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies: • As an infill mixed-use development in an urban area, the Project is expected to have a higher percentage of internal

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	consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency: • Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation. • Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides. • Provide a vanpool for employees. • Fund capital improvement projects to accommodate future traffic demand in the area. • Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: o Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement o Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document) o Signage and striping onsite to encourage	and pass-by trips. Furthermore, because of its proximity to public transit, employment and entertainment destinations, a number of Project trips would be expected to be walk or transit trips rather than auto vehicle trips. Similarly, because the commercial components of the Project will be primarily locally serving to the Project and the surrounding area, some of the trips might be expected to be walk-ins either from the Project or the surrounding area. • The Project would include 493 on-site bicycle parking spaces, which is pursuant to the standards and requirements of the City's Bicycle Ordinance (182386, effective March 13, 2013). Bicycle maintenance areas would also be provided.

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	bike safety o Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials o Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan. o Direct transit sales or subsidized transit passes o Guaranteed ride home program o Pre-tax commuter benefits (checks) o On-site car-sharing program (such as City Car Share, Zip Car, etc.) o On-site carpooling program o Distribution of information concerning alternative transportation options o Parking spaces sold/leased separately o Parking management strategies; including attendant/valet parking and shared parking spaces. • Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas. • Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit facilities when feasible. • Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and	

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Topic	Measure	Applicability to the Project
	in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services. • Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work. • Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs. • Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles. • Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions. • Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles. • Purchase, or create incentives for purchasing, low or zero-emission vehicles. • Create local "light vehicle" networks, such as neighborhood electric vehicle systems.	

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Topic	Measure	Applicability to the Project
	• Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles. • Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles. • Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives. • Project Selection: o Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. o Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints. o Public Involvement: o Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community members and other stakeholders, especially to those traditionally underserved by transportation services. o Transit and Multimodal Impact Fees: o Assess transit and multimodal impact fees for new developments to fund public transportation infrastructure,	

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Topic	Measure	Applicability to the Project
	bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations. o Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions. • System Monitoring: o Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency. • Arterial Traffic Management: o Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. • Signal Synchronization: o Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic. • HOV Lanes: o Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions. • Delivery Schedules: o Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas.	

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	○ Implement and supporting trip reduction programs. ○ Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives. • Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities. • Bicycle and Pedestrian Trails: ○ Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations. • Bicycle Safety Program: ○ Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers. • Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects. • Bicycle Parking: ○ Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American	

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Topic	Measure	Applicability to the Project
	Bicyclists). • Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following: o Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation; o Eliminate or reduce minimum parking requirements for new buildings; o "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space); o Use parking pricing to discourage private vehicle use, especially at peak times; o Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities; o Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times; o Encourage shared parking programs in mixed-use and transit-oriented development areas. • Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: o Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral	

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Topic	Measure	Applicability to the Project
	parking; o Encourage special event center operators to advertise and offer discounted transit passes with event tickets; o Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking o Promote the use of bicycles by providing space for the operation of valet bicycle parking service. • Parking "Cash-out" Program: o Require new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use. • Pedestrian and Bicycle Promotion: o Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation. • Fleet Replacement: o Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models.	
Transportation/Traffic *Conflict with Applicable Congestion Management Program*	Project-Level Mitigation Measure **MM-TRA-2(b).** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion	This mitigation measure is not incorporated, because it is not applicable to the Project. The Traffic Impact Analysis (TIA) guidelines of the 2010 CMP for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak

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Topic	Measure	Applicability to the Project
	management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions: • Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities, including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: o Advocate for a regional, market-based system to price or charge for auto trips during peak hours. o Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.	hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed. The Project would not add a total of 50 or more peak-hour trips to any CMP arterial monitoring locations or 150 peak-hour trips to any CMP freeway monitoring locations. Thus, the Project would not result in any significant impacts related to CMP facilities, and no mitigation measures are required.

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Topic	Measure	Applicability to the Project
	○ Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology. ○ Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation. ○ Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay. • Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency: ○ A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak	

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Topic	Measure	Applicability to the Project
	traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes. o Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur. o Location of construction staging areas for materials, equipment, and vehicles at an approved location. o A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit. o Provision for accommodation of pedestrian flow. o As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces. o Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense., within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in	

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Topic	Measure	Applicability to the Project
	such case, r Repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy. o Any heavy equipment brought to the construction site shall be transported by truck, where feasible. o No materials or equipment shall be stored on the traveled roadway at any time. o Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion. o All equipment shall be equipped with mufflers. o Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors. o Promote "least polluting" ways to connect people and goods to their destinations. • Create an interconnected transportation system	

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Topic	Measure	Applicability to the Project
	that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency: o Ensure transportation centers are multi-modal to allow transportation modes to intersect. o Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail. o To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges. o Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations. o Coordinate schedules and routes across service lines with neighboring transit authorities. o Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles). o Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so. o Employ transit-preferential measures,	

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Topic	Measure	Applicability to the Project
	such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles. o Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets. o Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible. • Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including: o Ensure transit stops and bus lanes are safe, convenient, clean and efficient. o Ensure transit stops have clearly marked street-level designation, and are accessible. o Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate. o Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one-half mile. • Enhance customer service and system ease-of-use, if determined feasible and applicable by the	

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Topic	Measure	Applicability to the Project
	Lead Agency, including: o Develop a Regional Pass system to reduce the number of different passes and tickets required of system users. o Implement "Smart Bus" technology, using GPS and electronic displays at transit stops to provide customers with "real-time" arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service). o Investigate the feasibility of an on-line trip-planning program. • Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including: o Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic. o Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access. • Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including: o Designate a certain percentage of parking spaces for ride-sharing vehicles. o Designate adequate passenger loading,	

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Topic	Measure	Applicability to the Project
	unloading, and waiting areas for ride-sharing vehicles. o Provide a web site or message board for coordinating shared rides. o Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit. o Hire or designate a rideshare coordinator to develop and implement ridesharing programs. • Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including: o Provide assistance to regional and local ridesharing organizations. o Advocate for legislation to maintain and expand incentives for employer ridesharing programs. o Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes. o Provide public recognition of effective programs through awards, top ten lists, and other mechanisms. • Implement a "guaranteed ride home" program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program. • Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations. • Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist	

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Topic	Measure	Applicability to the Project

	destinations or shopping and business centers.
	• Work with existing shuttle service providers to coordinate their services.
	• Facilitate employment opportunities that minimize the need for private vehicle trips, including:
	  o Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations.
	  o Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate.
	• Enforce state idling laws for commercial vehicles, including delivery and construction vehicles.
	• Organize events and workshops to promote GHG-reducing activities.
	• Implement a Parking Management Program to discourage private vehicle use, including:
	  o Encouraging carpools and vanpools with preferential parking and a reduced parking fee.
	  o Institute a parking cash-out program.
	  o Renegotiate employee contracts, where possible, to eliminate parking subsidies.
	  o Install on-street parking meters with fee structures designed to discourage private vehicle use.
	  o Establish a parking fee for all single-occupant vehicles.
	• Work with school districts to improve pedestrian and bicycle to schools and restore school bus service
	• Encourage the use of bicycles to transit facilities	

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Topic	Measure	Applicability to the Project
	by providing bicycle parking lockers facilities and bike land access to transit facilities. • Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency. • Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers. • Synchronize traffic signals to reduce congestion and air quality. • Work with community groups and business associations to organize and publicize walking tours and bicycle evens. • Support legislative efforts to increase funding for local street repair.	
Transportation/Traffic *Inadequate Emergency Access* Hazards and Hazardous Materials *Impair or Interfere with Emergency Response or Evacuation Plan*	Project-Level Mitigation Measure **MM-TRA-5(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider improving emergency access and ensuring compliance with the provisions of the county and city general plan, Emergency Evacuation Plan, and other regional and local plans establishing access during emergencies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency: • Prior to construction, project implementation	This mitigation measure is not incorporated, because the City has determined that the existing regulatory requirements listed below would apply to the Project and are equal to or more effective than the SCAG RTP/SCS Program EIR MM-TRA-5(b). Specifically, the Project would be subject to the City's existing regulations that require the Project to comply with the Fire Code and LAMC emergency access requirements. Additionally, the LAFD would require the Project Applicant to prepare an emergency response plan that would address the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, and locations of nearest hospitals and fire departments.

Table 4-1
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Topic	Measure	Applicability to the Project
	agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: o Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. o Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. o Scheduling of truck trips outside of peak morning and evening commute hours. o Limiting of lane closures during peak hours to the extent possible. o Usage of haul routes minimizing truck traffic on local roadways to the extent possible. o Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. o Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and	

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Topic	Measure	Applicability to the Project
	Maintenance Work Zones. o Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. o Storage of construction materials only in designated areas. • Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. • Enhance emergency preparedness awareness among public agencies and with the public at large. • Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: o Incorporate strategies and actions pertaining to response and prevention of	

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Topic	Measure	Applicability to the Project
	security incidents and events as part of the on-going regional planning activities. o Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format. o Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function.	
Utilities and Service Systems *Require New Water or Wastewater Treatment Facilities*	Project-Level Mitigation Measure **MM-USS-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on utilities and service systems, particularly for construction of storm water drainage facilities including new transportation and land use projects that are within the responsibility of local jurisdictions including the Riverside, San Bernardino, Los Angeles, Ventura, and Orange Counties Flood Control District, and County of Imperial. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures, as applicable and feasible. These mitigation measures are within the responsibility of the Lead Agencies and Regional Water Quality Control Boards of (Regions 4, 6, 8, and 9) pursuant to the provisions of the National Flood Insurance Act, stormwater permitting requirements for stormwater discharges for new constructions, the flood control act, and Urban Waste Management Plan. Such mitigation measures, or other comparable measures, capable of avoiding or reducing significant	This mitigation measure is not incorporated, because it is not applicable to the Project, as the Project would not require the need for new or upgraded water or wastewater treatment facilities.

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Topic	Measure	Applicability to the Project
	impacts on the use of existing storm water drainage facilities and can and should be adopted where Lead Agencies identify significant impacts on new storm water drainage facilities.	
Utilities and Service Systems *Require New or Expanded Entitlements for Water Supply*	Project-Level Mitigation Measure **MM-USS-4(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with EO B-29-15, provisions of the Porter –Cologne Water Quality Control Act, California Domestic Water Supply Permit requirements, and applicable County, City or other Local provisions. Such measures may include the following or other comparable measures identified by the Lead Agency: • Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. • Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and	This mitigation measure is not incorporated, because the City has determined, in reliance on a water supply assessment prepared pursuant to SB 610 and SB 221 for the Project by LADWP (refer to Appendix P), that the projected water supply available during normal, single-dry water years as included in the 25-year projection contained in its adopted 2015 Urban Water Management Plan can be accommodate the projected water demand associated with the Project, in addition to the existing and planned future development. LADWP estimates that the Project would consume approximately 99,226 gallons of water per day. The Project Applicant has voluntarily committed to incorporate the water conservation measures listed below into the Project that are beyond those required by the City's Green Building Code (refer to PDF-1, Sustainability Measures, in Section 2 [Project Description]). • High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less. • Showerheads with a flow rate of 1.5 gallons per minute (gpm) or less. • Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less. • Drip/subsurface irrigation (micro-irrigation) • Micro-spray • Proper hydro-zoning/zoned irrigation (group plants with similar water requirements) • Artificial turf • Drought-tolerant plants – 50 percent of total landscaping

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Topic	Measure	Applicability to the Project
	hillside landscaping can and should be implemented where feasible. • Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. • Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.	LADWP's WSA finds adequate water supplies would be available to meet the total additional water demand of 99,226 gallons per day for the Project. LADWP anticipates the projected water demand from the Project could be met during normal, single-dry, and multiple-dry water years, in addition to the existing and planned future demands on LADWP. Therefore, Project impacts related to water supply would be less than significant. Additionally, the Project would be subject to the City's existing water conservation measures outlined in the City's Green Building Code – measures that are substantially similar to those listed in MM-USS-4(b).
Utilities and Service Systems *Landfill with Sufficient Capacity*	Project-Level Mitigation Measure **MM-USS-6(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the	This mitigation measure is not incorporated, because the City has determined that the City's existing regulatory requirements regarding recycling would apply to the Project and are similar to the waste reduction measures listed in MM-USS-6(b) and equal to or more effective than the SCAG RTP/SCS Program EIR MM-USS-6(b).

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Topic	Measure	Applicability to the Project
	responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project that has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance pursuant to the provisions of the Solid Waste Diversion Goals and Integrated Waste Management Plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: o Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. o Inclusion of a waste management plan that promotes maximum C&D diversion. o Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). o Reuse of existing structure and shell in renovation projects. o Design for deconstruction without compromising safety. o Design for flexibility through the use of	

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Topic	Measure	Applicability to the Project
	moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components. o Development of indoor recycling program and space. o Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. o Locally generated waste should be disposed of regionally, considering distance to disposal site. Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required. o Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target. o Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices.	

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Topic	Measure	Applicability to the Project
	○ Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. ○ Develop alternative waste management strategies such as composting, recycling, and conversion technologies. ○ Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. ○ Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). ○ Integrate reuse and recycling into residential industrial, institutional and commercial projects. ○ Provide recycling opportunities for residents, the public, and tenant businesses. ○ Provide education and publicity about reducing waste and available recycling services. ○ Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates. ○ Implement or expand city or county-	

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Topic	Measure	Applicability to the Project
	wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	

Source: Southern California Association of Governments, Final 2016 2016-2040 RTP/SCS Program Environmental Impact Report, Mitigation Monitoring and Reporting Program, April 2016.